

RIN 0970-AD30 / Docket No. ACF-2026-0595

Re: Reducing Federal Burden for Head Start Programs (RIN 0970-AD30)

Rhode Island KIDS COUNT is a statewide children's policy organization. We work to improve the economic well-being, health, safety, and education of Rhode Island's children through data-driven advocacy. Our mission is to advance equitable policies that improve the lives of all Rhode Island children and eliminate disparities through the power of data, advocacy, and civic action. We believe that every child in Rhode Island, regardless of race, ethnicity, disability, zip code, immigration status, neighborhood, or income, should thrive in a community where they are healthy, safe, educated, and economically secure.

Rhode Island KIDS COUNT strongly opposes the changes in the proposed rule entitled "Reducing Federal Burden for Head Start Programs." The proposed rule would fundamentally undermine the Head Start Program Performance Standards (HSPPS), weaken critical protections for children, and disproportionately harm the most vulnerable families in Rhode Island and across the nation. We understand the Administration's goal of reducing unnecessary administrative burden. However, this proposal strips away critical protections for children that have been delivered through the Head Start program and will result in greater spending on these children throughout their lives if their basic needs remain unmet. It eliminates federal requirements that are essential to child safety, program quality, and equitable access to services, which would increase geographic inequities and access to services across the country. States with weaker licensing standards would offer lower-quality Head Start services, and the children who need the most support would receive the least.

Head Start is one of the most successful and cost-effective investments our nation makes in children and families. Decades of research show that high-quality early childhood programs not only pay for themselves but also generate high returns on investment. The proposed rule would put these returns at risk.

A. The Proposed Rule Would Replace Head Start with Weaker State Licensing Requirements

For more than 60 years, Head Start has provided comprehensive early childhood education, health, nutrition, and family support services to millions of low-income children and families. The HSPPS establish evidence-based requirements for teacher qualifications, staff-child ratios, health and safety protocols, and family engagement.

The proposed rule would rescind and replace these standards with a dramatically streamlined framework that defers to state licensing requirements in many areas. While state licensing standards provide a baseline for health and safety, they are not designed to promote school readiness or comprehensive child development like the evidence-informed Head Start Standards. As noted in the Children's Equity Project analysis, "Lowering the Bar," state licensing answers one question: What is the minimum set of standards required so children are not in danger?

An [analysis](#) by the National Institute of Early Education Research (NIEER) describes how multiple meta-analyses demonstrate that lower staff to student ratios result in less coercive, more developmentally appropriate positive interactions and larger literacy gains. Rhode Island's ratios for children under age 18 months are the same as the current Head Start ratio requirements. However, removing the ratio requirements from the Head Start requirements will mean that children between the ages of 18 months and 36 months will be in classrooms with higher ratios and thus may experience fewer positive interactions.

State licensing standards define the quality "floor," or the bare minimum needed to operate a childcare program. They do not comprehensively address child development, learning, and school readiness. In contrast, HSPPS go beyond ensuring children are safe, promoting the high-quality educational experiences that prepare them for success in kindergarten and beyond.

B) Rhode Island's Head Start Programs Are Already Stretched Thin

In Rhode Island, Head Start and Early Head Start programs serve thousands of children and families each year. According to the 2025 Program Information Report (PIR), the state has 14 Head Start and Early Head Start programs. Together, they serve 2,598 children and pregnant women. These programs are a lifeline for low-income families. They provide early education, health screenings, dental care, mental health services, and family support.

Additionally, 100% of education managers and coordinators hold a baccalaureate or advanced degree in early childhood education or a related field. However, the proposed rule would eliminate the federal requirement that preschool teachers hold a baccalaureate degree. Reducing the educational requirements for early childhood educators, and reducing the funding available to compensate them, will result in lower wages for educators and higher turnover, which we know negatively impacts the [relationships children are able to form](#) in the early childhood setting.

C) Health and Mental Support Services Would Be Severely Undermined

The proposed rule would cut or lower requirements for mental and physical health supports that set children up for success in later life. The current HSPPS requires programs to screen children's health, help families navigate health systems, provide dental and mental health services, and ensure children receive ongoing preventive care. These requirements are particularly important for low-income children, who are more likely to experience unmet health needs and developmental delays.

In Rhode Island, Head Start programs serve a population with significant unmet health needs. Less than two thirds of Rhode Island children had continuous, accessible oral care, including preventative care and oral treatment, at the beginning of their enrollment in Head Start. Through the course of the 2025 program year, that number increased to nearly 80%. Similarly, the percentage of children who were up to date with their age-appropriate preventative and primary health care according to Rhode Island's Early and Periodic Screening, Diagnosis, and Treatment schedule went from 66% at enrollment to 87% at the end of enrollment in the 2025 program

year. The proposed rule would eliminate many of the federal requirements that ensure these children receive the health screenings and treatment they need.

The proposal would also eliminate the requirement for monthly mental health consultation. This service is critical for supporting children's social-emotional development and addressing challenging behaviors. In Rhode Island, 66.67% of classroom teachers, home visitors, and family childcare providers received assistance in their work supporting Head Start children and families from a mental health consultant through observation and consultation. Removing this requirement would leave many programs without the expertise needed to support children who have experienced trauma or who have behavioral health needs. In Rhode Island, 22% of children under age five enrolled in RIte Care (Rhode Island's Medicaid program that covers low-income children) have a diagnosis of Serious Emotional Disturbance. These impacts do not go away later in childhood, either: according to the *2026 Rhode Island KIDS COUNT Factbook*, 36% of Rhode Island high school students reported feeling sad or hopeless for more than two weeks during the past year.

D) Special Populations: Children with Disabilities, Homeless Children, Victims of Neglect and Abuse, and Multilingual Learners Would Be Left Behind

The proposed rule would weaken protections for children with disabilities and dual language learners. Under the current HSPPS, programs must ensure that at least 10% of enrolled children are eligible for services under the *Individuals with Disabilities Education Act (IDEA)*. They must also provide additional services and supports to children with disabilities and their families. The proposed rule would remove these requirements.

In Rhode Island, the data show that children with disabilities are already a significant portion of the Head Start population. According to the 2025 PIR, 175 children enrolled in Head Start were diagnosed with a disability under *IDEA*. This represents 89.29% of those evaluated.

According to the 2025 PIR, 137 families served during the enrollment year were experiencing homelessness. Additionally, 98 children were in foster care at some point during the program year. The proposed rule would make it more challenging for families experiencing homelessness, to enroll and receive support, by removing the option of self-attestation for housing status as well as removing requirements that programs reserve 3% of slots for children experiencing homelessness and children enrolled in foster care.

Additionally, 2,108 children in Rhode Island were victims of child neglect and abuse in 2025, with 40% of those victims being young children ages 5 and under. Early intervention and inclusive early learning are critical for these children. The proposed rule would make it harder for programs to provide the individualized supports children and families need, with higher ratios, fewer mental and physical health support requirements, and the elimination of evidence-based provisions of the Early Head Start home visiting model such as caseload, visit duration, and home visitor qualifications that can prevent child neglect and abuse.

The proposal would also eliminate the requirement that programs support bilingualism and home language development for dual language learners. In Rhode Island, 42% of Head Start children are dual language learners, and 30% speak Spanish as their primary language at home. Evidence demonstrates that children who are taught in the language spoken at home [supports acquisition of foundational pre-math skills](#) as well as expressive vocabulary skills in the home language, even in preschool. Furthermore, this requirement would create significant implementation challenges for programs currently serving dual-language learners, requiring significant retraining and re-hiring of teachers who have already built strong relationships and knowledge of the program, potentially at substantial expense.

E) Family Engagement and Community Partnerships Would Be Weakened

Head Start's success depends on meaningful family engagement: the program recognizes parents as their children's first and most important teachers. The proposed rule would eliminate the requirement for parent advisory groups, undermining this foundational principle. In Rhode Island, 1,638 volunteers have contributed to Head Start programs. Of those volunteers, 884 were current or former Head Start parents.

The proposed rule would also eliminate regulatory requirements for community partnerships and coordination with other early childhood programs. For example, the transition from Early Head Start to Head Start or from Head Start to Kindergarten is a critical juncture. The current HSPPS ensures that programs work together to make these transitions as seamless as possible, and eliminating this requirement would leave children and families struggling with the transition between programs and systems, more vulnerable to falling through the cracks and falling behind.

F) The Administrative Cost Cap Would Force Impossible Choices

The proposed rule would reduce the allowable administrative cost cap from 15% to 5% of total approved program costs. Administrative costs include essential functions such as fiscal management, human resources, data reporting, and compliance with federal and state requirements. Cutting the cap to 5% would force programs to choose between laying off administrative staff, reducing direct services, or failing to comply with the cap.

Furthermore, the administrative cost cap would disproportionately impact smaller programs. Smaller programs struggle to cover basic administrative costs because they lack enough staff, sites, or funding to spread those costs across. Smaller programs may struggle to distribute fixed administrative costs, and more than half of Rhode Island Head Start programs fall into this category, with less than 200 slots between Head Start and Early Head Start. By reducing the cap to 5%, the proposed rule would make it even harder for these programs to operate.

G) The Proposed Rule Would Harm Rhode Island's Most Vulnerable Children

The cumulative impact of these changes would be devastating for Rhode Island's most vulnerable children. The proposed rule would reduce the number of qualified teachers, eliminate

health and mental support services, weaken protections for children with disabilities and dual language learners, and reduce family engagement.

In Rhode Island, children in poverty are already more likely to experience food insecurity, housing instability, and unmet health needs. According to the *2026 Rhode Island KIDS COUNT Factbook*, 14% of Rhode Island children live in poverty, and 73% of them are children of color. Additionally, 1,994 children were identified as homeless by public school personnel during the 2024-2025 school year. Furthermore, 98 children were in foster care at some point during the 2025 Head Start program year. Weakening the HSPPS would make it harder for Head Start to fulfill its mission and would widen the achievement gap that already exists between low-income children and their more privileged peers.

According to HHS's own estimates, the proposed rule's Regulatory Impact Analysis projects that 40,000 Head Start jobs could be cut if the proposal is enacted. These cuts would include teachers, child development specialists, bus monitors, and coaches. In Rhode Island, the analysis estimates that 135 jobs could be lost. It also projects that funding for health services could decline by \$600,000. These job losses would harm the children and families who rely on Head Start.

H) Conclusion

Rhode Island KIDS COUNT strongly opposes the proposed rule "Reducing Federal Burden for Head Start Programs." The proposed changes would undermine the quality of Head Start services, weaken protections for children, and harm the most vulnerable families in Rhode Island and across the nation. We urge the Administration for Children and Families to withdraw this proposed rule and to work with stakeholders to identify targeted, evidence-based improvements to the HSPPS. These improvements should maintain the program's high standards while reducing unnecessary administrative burden.

We urge the Administration to protect the Head Start Program Performance Standards and withdraw these proposed changes. We also urge the Administration to ensure that all children, regardless of their circumstances, have access to the high-quality early learning experiences they deserve. Thank you for the opportunity to submit this comment.