

**Instructions: Comment Template for “Reducing Federal Burden for Head Start Programs”
NPRM (RIN: 0970-AD30; Docket ID: ACF–2026–0595)**

For Multilingual/Language Justice Advocacy Organizations

Thank you so much for drafting a unique comment reflecting the views and expertise that you and/or your organization bring to this issue. The agency is required to review all comments, so your experience, perspective, and the evidence you cite are an important part of the record.

As an advocate for multilingual learners and language access, we encourage you to draw upon your research/advocacy expertise in filling out this public comment template to highlight the proposed rule’s harms with removing requirements to support dual language learners and proposing an English-only instruction provision.

The template will prompt opportunities for you to personalize the comment in the highlighted sections, though we encourage you to tailor the comment as much as you’d like to ensure your priorities are elevated. **It is very important that your comment is substantially in your own words, or else it will not be counted as a distinct contribution to the record.** Please feel free to delete sections of the template that you do not feel you have something to add to, and add/restructure where you see fit.

The more distinct your comment the better in guaranteeing it will be evaluated as a distinct comment submission. When you have finished assembling your comment, please submit it using this link: [Reducing Federal Burden for Head Start Programs](#).

Please submit all comments to HHS in English. If you need assistance with translation, please consider using Google Translate before submitting your document. Please email advocacy@startearly.org with questions.

Por favor, envíe todos los comentarios al Departamento de Salud y Servicios Humanos (HHS) en inglés. Si necesita ayuda con la traducción, considere usar Google Translate antes de enviar su documento. Si tiene preguntas, envíe un correo electrónico a advocacy@startearly.org.

As a reminder, the deadline to submit your comments is **October 6th at 11:59pm ET**.

[DATE], 2026

Submitted Electronically via Regulations.gov.

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

Dear Secretary Kennedy:

[Organization name] appreciates the opportunity to comment on the U.S. Department of Health and Human Services' (HHS's) notice of proposed rulemaking (NPRM) *Reducing Federal Burden for Head Start Programs* (RIN: 0970-AD30). **We strongly urge HHS to withdraw the proposed rule in full due to significant concerns regarding provisions requiring English-only instruction and removing essential standards that support dual language learners (DLLs).** The proposed rule disproportionately impacts dual language learners, their families, and the Head Start workforce, and undermines decades of research and best practices demonstrating the importance of nurturing a child's home language and its impact on long term academic and life outcomes when instruction includes the home language.

[INSERT paragraph describing you/your organization and why this is urgent to you. Discuss your expertise, and the impacts of the English-only provision and supports for dual language learners on the population or program(s) that you are particularly concerned about the effects upon.]

Overview

Head Start is the federal program that offers children in the lowest income neighborhoods across the country child care, early education, health and dental checkups, and support for children with delays or disabilities. It also supports pregnant women and babies through Early Head Start. Head Start currently serves more than 700,000 children in 20,000 locations across the country. Dual language learners make up 40% or higher of all children enrolled in Head Start in 2025 in states like Arizona, California, Florida, Illinois, New Jersey, New York, and Texas.¹ Estimates from HHS show that approximately 33% of Head Start classrooms, or 18,000 classrooms, that primarily serve dual language learners may be impacted by the proposed rulemaking.

¹ Children's Equity Project, Preserving Access and Opportunity in Head Start for Dual Language Learners (2026). <https://cep.asu.edu/sites/g/files/litvpz916/files/2026-08/Preserving%20Access%20and%20Opportunity%20in%20Head%20Start%20for%20Children%20Dual%20Language%20Learners%20%20A%20Review%20of%20the%20Science%2C%20Legislative%20Mandates%2C%20and%20Regulatory%20Requirements%20%2811%29.pdf>. WTTW News, Illinois Advocate Sounds the Alarm as Trump Administration Proposes Eliminating Head Start Regulations. (August 2026). <https://news.wttw.com/2026/08/06/illinois-advocate-sounds-alarm-trump-administration-proposes-eliminating-head-start>. Migration Policy Institute. Young Dual Language Learners in the United States and by State, 2019-2023. <https://www.migrationpolicy.org/data-tool/young-dual-language-learners-united-states>. Migration Policy Institute. A Data Profile of Young Dual Language Learners and Implications for Early Childhood Programs. <https://www.migrationpolicy.org/publication/data-profile-young-dual-language-learners-and-implications-early-childhood-d-programs>

The comments below outline the research and rationale demonstrating the harm the proposed rule could bring to dual language learners and the program writ large. By eliminating critical guidance for Head Start providers and staff and prohibiting dual language learning, this rule will upend the Head Start workforce and reduce the quality of and access to care for thousands of families—contradicting their legal eligibility for services.² In addition to violating Head Start’s core mission and statutory mandate, the proposed rule will likely force closure of classrooms and programs, undercut community-wide education and health outcomes, and damage local and state economies. **Therefore, we oppose the proposed rule and urge the Department to rescind it.**

I. Requiring English-only instruction conflicts with Head Start’s mandate to help children from immigrant families acquire English language skills and could undermine their overall academic achievement.

The proposed rule requires all educational instruction to be conducted in English, reversing the program’s current bilingual-development pedagogy and eliminating bilingual staffing requirements. Robust research shows that DLLs who receive high quality instruction in their home language, alongside English, have better and faster English-language acquisition trajectories and higher gains in their academic skills, than DLLs in English-only programs.³ Prohibiting dual language instruction also will deprive DLLs of the numerous developmental, cognitive, and educational benefits shown to occur when DLLs become bilingual.⁴ Research on Head Start specifically shows that dual language instruction leads to higher English vocabulary skills for DLLs than those instructed only in English. Additionally, recent research findings in Illinois demonstrate full-day bilingual education can lead to stronger attendance and kindergarten readiness.⁵

[INSERT paragraph documenting your organization’s knowledge/research about the positive impacts of dual language learning, culturally responsive learning, and cross-cultural exchange—which would all be threatened by the rule.]

Children rely on consistent, responsive, nurturing early education and care to support the rapid development they undergo, particularly during the first five years of life.²³ Analyses of Head Start have found that the positive effects of Head Start on language skills are particularly stronger and longer lasting for DLLs.²⁴ Access to high-quality early education services supports DLLs’ development during the critical early years and promotes better long-term outcomes as well, including increasing graduation rates and adult earnings; reducing the need for special

² Hannah Matthews as updated by Mikayla Slaydon, *Immigrant Eligibility for Federal Child Care and Early Education Programs*, Center for Law and Social Policy (2026), <https://www.clasp.org/wp-content/uploads/2026/06/CCEE-Factsheet-Update-6.26-FINAL.pdf>.

³ ÓBN GVC]lt/files/2022-06/Instruction%20Brief%204%20Infants%20Toddlers.pdf [https://perma.cc/CM5D-VRS9].

⁴ Ellen Bialystok, *Reshaping the Mind: The Benefits of Bilingualism*, 65 *Canadian Journal of Experimental Psychology* 229, 229–235 (2011); Gloria Chamorro & Vikki Janke, *Investigating the Bilingual Advantage: The Impact of L2 Exposure on the Social and Cognitive Skills of Monolingually-Raised Children in Bilingual Education*, 25 *International Journal of Bilingual Education and Bilingualism* 1765, 1765–1781 (2022); Alexandra Figueras-Daniel and Christina Stephens, *An English-Only Mandate for Head Start Will Harm Children*, National Institute for Early Education Research (2026), https://nieer.org/sites/default/files/2026-08/head_start_deregulation_brief_dlls_8.20.26_2.pdf.

⁵ Natalie L. Bohlmann et al., *Academic Outcomes of English Learners in Monolingual and Dual Language Programs*, 101 *Journal of Applied Developmental Psychology* (2025), <https://www.sciencedirect.com/science/article/abs/pii/S0193397325001169>. De la Torre, M., Freire, S., & Blanchard, A. (2021, September). English learners in Chicago Public Schools: An exploration of the influence of Pre-K and early grade years. UChicago Consortium on School Research. <https://consortium.uchicago.edu/publications/English-learners-in-Chicago-Public-Schools-an-exploration-of-the-influence-of-pre-K>.

education services; and even improving health in adulthood.²⁵ Requiring English-only instruction conflicts with the Congressional mandate to provide culturally and linguistically appropriate education to DLLs and would undermine the evidence-based practices that help DLLs develop both their home language and English.⁶

[INSERT any examples of success stories of DLL Head Start alumni in your network, if applicable.]

II. English-only Instruction in “All Education” Is Undefined and Unworkable in an Early Childhood Environment

The NPRM does not define “education,” does not identify which interactions may occur in a child’s home language, and does not state whether bilingual books, songs, classroom displays, digital tools, and educational materials are prohibited — even though its own cost analysis assumes programs will replace “classroom materials that have words, such as educational toys and books” (91 Fed. Reg. at 51287). A rule that leaves regulated parties unable to determine whether ordinary caregiving and teaching conduct is a compliance violation fails to give fair notice and lacks the reasoned standard the Administrative Procedure Act requires. ACF must, at a minimum, define the term and expressly identify the interactions and materials the rule does not reach; otherwise the chilling effect described above is not a risk but a certainty.

III. English-Only Instruction Could Undermine Valid Screening and Assessment of Multilingual Children

English proficiency and developmental competence are not interchangeable constructs. A three-year-old who has been in the United States for six months may have age-appropriate vocabulary, reasoning, and social-emotional skills in Spanish while producing almost no English. An English-only assessment environment makes it more difficult to distinguish emerging English proficiency from developmental delay. Conversely, genuine developmental needs may be overlooked if educators cannot appropriately evaluate what a child understands and can communicate in the child’s strongest language. The NPRM also does not state whether screening, observation, assessment, and progress monitoring are “education” under § 1301.04(a); does not state whether bilingual staff may use a child’s home language to determine what the child knows and can do; does not explain how programs will distinguish English-language acquisition from developmental disability or delay; and proposes no mechanism to monitor over- or under-identification of multilingual children for disability service.

IV. Restricting dual language instruction will further strain the Head Start workforce, despite the proposed rule’s stated efforts to reduce programmatic burden.

Proposals to re-train or re-hire staff in order to enforce proposed language restrictions would further destabilize the Head Start workforce, imposing undue restrictions on local needs. Per the NPRM’s Regulatory Impact Analysis, the proposed English-only restrictions would require an estimated 34,464 teachers to be retrained or replaced. In the 18,767 classrooms primarily serving dual language families, the proposal would require replacing curricula, teaching materials, and books and educational toys that have non-English words. The proposal would therefore require retraining or removing approximately one-third of all non-tribal Head Start classrooms across the country, as the Head Start workforce simultaneously battles high turnover rates and classroom under-enrollment.⁷ The proposed rule to eliminate bilingual education requirements and shift to an English only model acknowledges that implementing

⁶ Head Start Act, 42 U.S.C. §9836A, Sec. 641A.1(B)(x).

⁷ K.A. Kwon et al., *A longitudinal study of Head Start teacher turnover trends and factors*, 156 Teaching and Teacher Education (2025), <https://fpg.unc.edu/publications/longitudinal-study-head-start-teacher-turnover-trends-and-factors>.

these changes would create additional one time costs: \$47 million to replace curricula, books, toys, and other materials containing non-English words; and \$26-78 million for professional development of teachers.

These workforce disruptions would directly and disproportionately impact DLLs. Requiring programs to retrain and replace multilingual educators would reduce their capacity to provide linguistically and culturally responsive instruction, communicate with families, and build the consistent relationships DLLs need to thrive. For DLLs, removing educators who share their languages and understand their cultural and linguistic backgrounds risks disrupting continuity of care and limiting access to supports that promote their language and developmental outcomes.

Further, while the proposed rule purports to reduce regulatory and programmatic burden, upheaving a third of the Head Start workforce that is currently providing the services that reflect their communities' needs limits program flexibility, exacerbates existing workforce challenges, and undermines the rule's stated mission. Research shows that recent anti-immigrant policy has shrunk the already strained early childhood educator workforce, with no gains from native-speakers filling the gaps that the fear-based policies have caused.⁸ [PROVIDE an example of the harms of children not having access to culturally responsive learning and/or the importance of utilizing the skills of a multilingual workforce, demonstrating that the proposed restrictions are overly prescriptive].

V. Requiring English-only instruction diminishes eligible parents' authority in their Head Start services.

The NPRM's English-only mandate also deprives DLL parents of the opportunity to be engaged with their child's school and to form strong family partnerships with the Head Start community, despite a desire to do so, resulting in negative impacts on children's well-being and learning. Research shows that reciprocal communication and understanding with interpretation support allows families who do not speak English fluently to be integrated and involved in the school community and form collaborative partnerships.⁹ Parent engagement and strong school-family partnerships are key to children's well-being and learning, including their mental health and behavior.¹⁰

[INSERT research/examples of the value of multilingual, reciprocal communication between = parents and their children's teachers. Can also speak to the importance of family engagement in their children's learning, particularly for dual language families.]

By removing the requirement that at least one classroom staff member or home visitor speak the non-English language used by a majority of children, the NPRM strains parents' and children's ability to meaningfully engage with Head Start's services as well as staff's ability to engage with DLL families. As a result of the proposed rule's rollback of multilingual staffing requirements, parents may be less able to communicate with Head Start staff, directly conflicting with the Head Start Act's mandate for "Head Start agencies to maintain regular communications with parents, including conducting periodic meetings to discuss the progress of individual

⁸ Erkmen G. Aslim et al., *How rising ICE activity influences the childcare workforce*, 123(21) Proceedings of the National Academy of Sciences of the United States of America (2026), <https://tobin.yale.edu/research/how-rising-ice-activity-influences-childcare-workforce>.

⁹ Gillian Baxter and Anna Kilderry, "We are not able to speak English, so we don't know what is happening:" Missed opportunities for families' engagement in their children's learning, 152 Teaching and Teacher Education (2024); Carla Estefanía Vargas Valdés & Alejandra Falabella, *Being the Outsider: A Systematic Review of the Links Between Migrant Families and Early Childhood Education and Care Centres*, Contemporary Issues in Early Childhood (2025).

¹⁰ Susan M. Sheridan et al., *A Meta-Analysis of Family-School Interventions and Children's Social-Emotional Functioning: Moderators and Components of Efficacy*, 89 Review of Educational Research 296, 296-332 (2019).

children in Head Start programs.”¹¹ The proposed rule also contradicts the Head Start Act’s requirement that changes in standards “ensure that any such revisions in the standards will not result in the elimination of or any reduction in...parental involvement,” along with the overall quality and scope of services.¹²

We are deeply concerned about the devastating and far-reaching impacts this proposed rule would have on the federal Head Start program, local programs, and children and families in communities across the country. HHS’s proposal to mandate English-only instruction and peel back critical supports for DLLs would undermine Head Start’s ability to provide high-quality, culturally and linguistically responsive services and runs counter to robust research evidence that has shown that children learn a second language faster when their home language is supported. Rather than advancing the well-being and development of children and families, the proposed rule would dismantle evidence-based supports that DLLs rely on to thrive. **We strongly urge HHS to withdraw the NPRM in its entirety.** Thank you in advance for your careful consideration and thoughtful response to these comments.

Sincerely,

[Name, Title, Organization]

¹¹ Head Start Act, 42 U.S.C. § 9836, Sec. 641A.2(B)(ix)

¹² Head Start Act, 42 U.S.C. § 9836, Sec. 641A.2(C)(ii)