MASSACHUSETTS
HEAD START ASSOCIATION

August 12, 2025

Submitted electronically via Regulations.gov.

U.S. Department of Health and Human Services
330 C Street, S.W.
Washington, D.C. 20201

Re: Public Comment: Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of "Federal Public Benefit"

To Whom It May Concern:

Thank you for the opportunity to provide Public Comment to the U.S. Department of Health and Human Services' (HHS's) recent Notice on "Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of 'Federal Public Benefit.'"

I submit these comments on behalf of the Massachusetts Head Start Association (MHSA). MHSA represents the 28 Head Start and Early Head Start agencies in Massachusetts which collectively operate 50 Head Start, Early Head Start, and Migrant/Seasonal Head Start grants. Massachusetts Head Start programs serve a funded enrollment of roughly 10,000 eligible young children and pregnant women across the Commonwealth of Massachusetts.

Head Start's statutory mandate in the Head Start Act to "promote the school readiness of low-income children by enhancing their cognitive, social, and emotional development" is clear. Head Start is required to provide comprehensive early childhood education, health, nutrition, and family supports based on a prioritization of need, regardless of immigration status. All children deserve to learn and grow, and all families deserve supports and the opportunity to work and go to school. HHS's reinterpretation of the term "federal public benefit" under PRWORA to now include Head Start runs counter to that mandate. It threatens to exclude children not based on need but on bureaucratic criteria unrelated to the challenges they face in achieving their developmental or educational potential.

MHSA urges HHS to reverse this decision, which is harmful, antithetical to the program's mission, and runs counter to eligibility criteria defined in the Head Start Act. Below are specific consequences of the Notice.

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Impacts to Eligible Families

The requirements to present new and often difficult to gather paperwork will cause an undue burden to all families, no matter their citizenship or immigration status. Parents will face additional red tape when enrolling their children, as they will have to spend time gathering documents and tracking down missing items, taking away from parenting and work time. Documents such as birth certificates are often costly and time consuming to obtain, creating a burden on Head Start income-eligible families. The impact will be felt beyond immigrant families.

Head Start programs have a statutory mandate to serve families experiencing homelessness, and this new requirement will cause a particular burden to homeless families. Families experiencing homelessness, families experiencing domestic violence, children in foster care, and other families will have difficulty accessing records such as birth certificates to demonstrate their eligibility for Head Start. In Massachusetts, many families in our Emergency Assistance shelter system are currently in transition between shelter locations or between shelter and permanent housing. These transitions mean paperwork that would be used to determine eligibility may be lost or inaccessible. This is unrelated to immigration and in fact will deny enrollment to the families who Head Start is designed to serve and who would most benefit from Head comprehensive services.

The rule as written may also lead to a significant drop in enrollment among eligible Head Start families, including immigrant families with legal status. Whether due to a misunderstanding of the policy or an unrealized fear of losing legal immigration status such as green cards, past experience has shown that policies of this sort will lead to eligible families failing to access needed Head Start services which could support their children and the parents' ability to work. Additionally, since the closure of our Boston regional office, whose staff had capacity to provide individualized technical assistance at the program level, program directors and families have even fewer resources at their disposal to ensure that they are in compliance or to adopt new procedural changes.

Impacts To Head Start in the Community

This change will cause irreparable damage to the trust Head Start has built in communities. Head Start programs must serve as a trusted bridge between families and broader public services, referring to partner programs and collaborating across comprehensive services. By turning enrollment into a screening process for immigration status, this notice turns trusted partners into perceived gatekeepers of government scrutiny. Head Start programs also must be safe, welcoming environments for children and families to learn and thrive. This restriction to

enrollment seeks to make Head Start a less welcoming environment for all families, regardless of their immigration status.

Administrative impacts to Head Start programs

Implementing HHS's reinterpretation of PRWORA would require significant Head Start program staff time and costs to Head Start programs without a commensurate increase in federal funds. Increasing paperwork requirements through the notice would result in federally-funded program staff redirecting their time *away* from activities that advance Head Start's return on investment and *towards* the many hours required to verify the citizenship status of all children in their programs.

Head Start programs do not currently collect citizenship or immigration status information; the program was not designed – or charged by Congress – to collect citizenship or immigration documents. To enact the fundamental shift in the purpose of the Head Start program as directed by the notice will require hundreds of hours of: staff training; collecting and submitting families' verification documents; communication with families; demonstrating compliance; and remediating errors. Our programs not only lack the manpower to enact these changes but the funds available to increase their administrative capacity. In many programs, entry-level administrative assistants assist programs with enrollment by greeting families and working with them to complete applications. These staff members are not trained to evaluate different forms of documentation or assess whether it meets specific standards that could be required by new regulations. An additional layer of staff to collect, interpret, and validate newly required documentation would be cost prohibitive. This newly required administrative work undermines grantees' efforts to advance school readiness and will lessen the impact of the federal funds that were appropriated for that purpose.

Thank you in advance for your consideration of these comments. The Massachusetts Head Start community urges HHS to reverse this decision and looks forward to future opportunities to inform HHS's work to ensure that it continues to support all children and families.

Sincerely,
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