



October 6, 2026

Secretary Robert F. Kennedy Jr.
U.S. Department of Health and Human Services, Administration for Children and Families
200 Independence Ave SW
Washington, D.C. 20201

Re: IDRA Comments on Proposed Rule “Reducing Federal Burden for Head Start Programs” (Docket Number ACF-2026-0595)

Submitted via www.regulations.gov

Dear Secretary Kennedy,

IDRA submits this comment respectfully urging the U.S. Department of Health and Human Services – Administration for Children and Families to withdraw its proposed changes to the Head Start program, including those imposing English-only instruction.

IDRA is a nonpartisan national non-profit organization that works to ensure equitable educational opportunities for every student through strong, safe and well-funded public schools that prepare all young people to access and succeed in college. Through actionable research and data products, training for educators, timely policy analyses, and authentic community engagement, IDRA addresses the systems, policies and practices that create barriers to educational success.

Throughout our 53-year history, IDRA has been a leader in high-quality bilingual education curricula, teacher training, research and policy. We have advocated strong bilingual programs and opposed English-only policies because the research on the benefits of bilingual education is clear. Students’ academic experiences are richer and their future contributions to their communities are stronger when learning programs are able to both ensure English proficiency and support growth in students’ home languages.

IDRA developed one of the nation’s first bilingual curriculum for early childhood education, called *Amanecer*. Later, in 2005, IDRA held a grant from the U.S. Department of Education to operate and research the Reading Early for Academic Development (READ) project. IDRA staff collaborated with preschool teachers and specific Head Start centers across San Antonio to develop a research-driven, classroom-based professional development initiative that integrated instructional programming to support children’s early literacy and addressed reading difficulties as they entered school.

This and other efforts supported the later development in 2013 *Semillitas de Aprendizaje*™ to provide early childhood educators with a quality bilingual curriculum that centers stories and storytelling to develop students’ literacy skills.

Additionally, as IDRA led a regional equity assistance center for over 40 years, we helped protect the language rights and educational access of students who speak a language other

than English at home. IDRA has provided research-based professional development, supported parent collaboration and created materials for English learners. Many requests for services and technical assistance we received from school districts were related to supporting English learners because teachers and administrators recognized that strong bilingual education programs, backed by smart policies and best practices in curriculum and instruction are transformative for schools and students.

The proposal to include a mandate for Head Start programs to provide instruction only in English and to discontinue multilingual services would severely negatively impact learning opportunities for children, erect barriers to families' engagement in their children's education, and halt programs from collecting important data on young dual language learners. The rule change would directly impact 19,000 young children in Head Start programs across the country, effectively cutting off their access to effective early childhood education (Habben & Kim, 2025).

Decades of research show that providing accessible, affirming education in young children's home language fosters literacy learning, positive school outcomes and social development (Johnson, 2017). Investments in strong bilingual education programs build on students' early language instruction and result in academic gains (Perez & Latham Sikes, 2026). Children in families with limited economic means should not be denied early education in a language they understand. In the case of Head Start, denying children academic instruction in their home language denies them both early learning as well as the critical foundation they need for lifelong success.

We would be happy to answer any questions you may have. Please contact IDRA's Director of Policy, Advocacy, and Community Engagement, Dr. Chloe Latham Sikes at chloe.sikes@idra.org.

Sincerely,
IDRA

Citations

Federal Register. (August 7, 2026). A Proposed Rule by the Children and Families Administration.

<https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

Habben, K., & Kim, V. (August 2025). A Data Profile of Young Dual Language Learners and Implications for Early Childhood Programs. Migration Policy Institute. <https://www.migrationpolicy.org/publication/data-profile-young-dual-language-learners-and-implications-early-childhood-programs>

Johnson, P. (September 2017). Investing in Early Childhood Education Programs Yields High Returns. IDRA Newsletter. <https://www.idra.org/resource-center/investing-early-childhood-education-programs-yields-high-returns/>

Perez, A., & Latham Sikes, C. (January 2026). Effective Investment in early Education – How Texas School Districts Use the Early Education Allotment and Its Impact on Student Learning – IDRA Research Brief. IDRA. https://www.idra.org/education_policy/effective-investment-in-early-education-idra-research-brief/