

August 12, 2025

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: Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA);
Interpretation of “Federal Public Benefit,” RIN: 0991-ZA57**

Dear Secretary Kennedy:

CACFP Roundtable appreciates the opportunity to offer information to the U.S. Department of Health and Human Services’ (HHS’s) recent notice *“Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of ‘Federal Public Benefit’.”*

Formed in 1977, CACFP Roundtable is a nonprofit organization that works alongside the Child and Adult Care Food Program (CACFP) community to educate, advocate, and support the field. Our work is centered around child, family, and caregiver needs and we value the services care centers and community-based organizations offer through the CACFP. The program serves as a vital strategy for improving nutritional security and addressing food insecurity in our Head Start communities.

High-quality early learning services and meals, family and community growth and well-being fostered through the Head Start program are priorities for our organization. It is clear, based on our work and extensive research by the early childhood community, that the notice issued [Docket No: AHRQ-2025-0002] will have a severe and negative impact on the communities served by Head Start. This notice represents a stark departure from established precedent regarding what constitutes a federal public benefit and who should qualify and, consequently, **our organization, alongside a broad coalition of early childhood advocacy partners strongly urges you to immediately withdraw it.** This reversal on a nearly 30-year-old interpretation of PRWORA, in many cases, violates statutory requirements for changes to program eligibility, and is both broadly counterproductive and harmful to programs that serve vulnerable children and their families. **We strongly urge you to withdraw this notice.**

Sincerely,

Samantha Kay-Salvador Marshall

Samantha Marshall, M.A., M.P.A.P.
Director of Programs and Policy
CACFP Roundtable
samantha@cacfproundtable.org