

# Child Care Subsidy Staff Share Perspectives on Administrative Burden Faced by Latino<sup>a</sup> Applicants in North Carolina

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## Overview

Through the federal Child Care and Development Fund (CCDF), states administer child care subsidy programs to support low-income<sup>b</sup> parents' employment and expand children's access to high-quality child care. Many Hispanic children stand to benefit from this key public investment,<sup>1</sup> given that most live with an employed parent<sup>2</sup> and more than half live in low-income households.<sup>3</sup> Still, Latino families are generally less likely to use many forms of public assistance<sup>4</sup> and are underrepresented among child care subsidy recipients in 12 of the 13 states in which most low-income Hispanic children live.<sup>5</sup>

Among the factors that shape families' participation in social service programs, policy features and administrative practices are important levers in facilitating or restraining access.<sup>6</sup> Federal CCDF guidelines provide states with considerable flexibility in setting rules, policies, and procedures related to child care subsidies, including those related to eligibility criteria, documentation requirements, and the application and waitlist process.<sup>7</sup> Hill, Gennetian, and Mendez<sup>8</sup> previously described how several CCDF policy dimensions determined at the state or local levels can differentially affect Hispanic parents' access to child care subsidies. This brief extends the Hill et al. analysis of how state CCDF policies may shape Hispanic families' subsidy access by examining how such policies are interpreted and implemented on the ground by local caseworkers and administrators who work directly with families seeking subsidies.

To assess how state and local CCDF contexts may interact to influence Hispanic families' engagement with the child care subsidy program, we conducted an online survey of county-level subsidy agency supervisors and frontline caseworkers working in communities across North Carolina, a fast-growing Hispanic population state. We compared on-the-ground practices of local child care subsidy staff to state-level policy and guidance documents, highlighting cases where practices align or diverge from documented policies, and discuss the implications of this for Latino families' access to child care subsidies.

### Related Research on Policy Implementation

This study of North Carolina's child care subsidy program is one of several efforts to more deeply examine issues involved in implementing federal or state policies for government programs that offer benefits to eligible low-income families. We apply a Hispanic lens to this work to examine how administrative burden could limit the reach of program benefits among Latino families in particular. To date, related research with Hispanic populations analyzing administrative burden is available for the Child Care and Development Fund (CCDF) child care subsidy program (see [here](#)) and Temporary Assistance to Needy Families (TANF) income assistance programs (see [here](#) and [here](#)), across and within multiple state contexts.

<sup>a</sup> We use "Hispanic" and "Latino" interchangeably throughout the brief. Consistent with the U.S. Census definition, this includes individuals having origins in Mexico, Puerto Rico, and Cuba, as well as other "Hispanic, Latino, or Spanish" origins.

<sup>b</sup> Low-income households are consistently defined in research, and in this brief, as those with incomes below twice the federal poverty threshold adjusted for family size. For an example of this indicator, see the Annie E. Casey Foundation *Kids Count Data Center*, [Low-income working families with children](#).

## Key Findings

Local subsidy staff in North Carolina utilized a range of administrative practices when assisting families with the subsidy application process, and their perceptions of qualifying activities, prioritized populations, documentation requirements, and the language accessibility of program materials varied widely. Reported implementation practices reveal some inconsistencies with documented state-level policies and guidance. While some local subsidy staff practices may facilitate eligible Hispanic families' access to child care subsidies, others are likely to increase administrative burden and restrict access.

### Qualifying activities for child care subsidy eligibility

- All local subsidy staff identified employment as a qualifying activity; most (80% or more) considered education, job training, and activities related to the Temporary Assistance to Needy Families (TANF) program to be approved; and fewer (60% to 70%) considered job search and activities related to the Supplemental Nutrition Assistance Program (SNAP) to be approved. According to state policy documents, though, each of these activities qualify a family to receive assistance.
- On the other hand, most subsidy staff considered English as a Second Language (ESL) classes and housing search for homeless families to be qualifying activities, even though these are not described as eligible activities in state policy documents.
- In terms of the prevalence of different qualifying activities, most subsidy staff reported that employment, education, and TANF-related activities are common across the families they serve. In addition, just more than half reported job search and job training activities as common, and roughly one quarter reported SNAP-related activities, ESL classes, and housing search as common.

#### Defining the Roles of CCDF Staff

Specific job titles, and their functions, can vary across North Carolina counties and benefit systems. As described in this brief, frontline workers are those responsible for assisting families and processing applications for child care subsidies, and administrators provide oversight and management functions. In some counties, the same person could identify as an administrator and a frontline worker. We use "local subsidy staff" as an inclusive term for both of these job functions within county offices, while recognizing that other terms—including "practitioner" or "specialist"—are often used to describe an employee who engages with families to determine eligibility for government assistance programs.

### Required or requested documents as part of the application process

- Consistent with state policy, nearly all local subsidy staff reported that documents verifying income (98%) and work hours (86%) are required as part of the subsidy application.
- Most subsidy staff said they also require or request other documents from applicants that are not explicitly required by state policy but are left to local subsidy staff's discretion. Most staff reported requiring or requesting documentation verifying applicants' home address (87% require, 7% request), relationship to the child (78% require, 9% request), household membership (70% require, 12% request), citizenship status (60% require, 17% request), and Social Security Number (47% require, 37% request). Fewer than half of surveyed staff said they require or request driver's licenses, birth certificates, or documentation of household assets.
- More than half (57%) of local subsidy staff reported that, in their experience, applicants have difficulty providing one or more types of documentation. They report the most challenging documents to be those verifying income, work hours, citizenship status, and Social Security Numbers, with the latter two reported to be especially difficult for Latino applicants.

### Prioritized applicant groups

Most local subsidy staff (87%) said that, given limited funding, their office prioritizes certain applicants. Staff members' most commonly identified priority groups—children in child protective services (77%), children in foster care (63%), families in the TANF income assistance program (53%), children who are homeless (41%), and children with disabilities (36%)—align with those identified in state policy documents as groups to prioritize, although there was variation in how consistently they were endorsed across staff.

## Language accessibility of program information and resources

- More than half of the staff surveyed said that program information and resources are generally available in Spanish for in-person settings but are less accessible online. Most subsidy staff also reported having access to Spanish translation and interpreter services when needed, either on site (58%) or by phone (76%). Only a small percentage of staff (roughly 5%) described themselves as fluent in Spanish.
- According to local staff, supports for families speaking Indigenous languages from Latin America were far less available than those for Spanish-speaking families. Fewer than 20 percent said program information or application materials exist in any Indigenous language. Roughly 20 percent reported having access to translation or interpreter services on site to support communication with families who speak an Indigenous language, although more than 40 percent felt they could access these services by phone if needed.

## Variation in local subsidy staff perspectives and experiences by role

- In the various county offices within North Carolina, frontline subsidy staff members work with families alongside local agency administrators. Responses were generally similar across these staff members. The few statistically significant differences by role indicated the following:
  - Administrators were more likely than frontline workers to identify TANF recipients and employed parents as prioritized groups.
  - Administrators and frontline workers were equally likely to describe one or more documents as challenging for applicants to provide to staff. However, administrators were less likely than frontline workers to perceive challenges related to documentation of work hours, income, home address, and citizenship verification.
  - Administrators described some Spanish and Indigenous language supports as more accessible than did frontline workers.

### North Carolina: A Fast-Growing Hispanic Population State

North Carolina (NC) is a southeastern state with a Hispanic population that has grown significantly over the past three decades.<sup>2</sup> From 1990 to 2020, the state's Latino population increased more than 13-fold, from roughly 75,000 to more than 1.1 million (10.7% of the total population), a growth rate that outpaced the national average during this same period.<sup>9</sup> As is true nationwide, NC's Latino population is diverse along multiple dimensions, including by ethnic heritage, country of birth, and linguistic background. Based on 2019 American Community Survey estimates, just more than half (54%) of the state's Hispanic population identify their primary ancestry as Mexican. An additional 11 percent are Puerto Rican; 16 percent identify as either Honduran, Salvadoran, or Guatemalan; and the remaining 19 percent have ancestral roots in a wide range of other Central and South American countries and the Caribbean.<sup>9</sup> Sixty percent of NC's Hispanic residents were born in the United States.

Linguistically, more than 75 percent of NC's Hispanic residents ages 5 and older speak a language other than English at home, although more than half also report speaking English "very well."<sup>9</sup> While Spanish is the predominant non-English language spoken in NC Latino households, a variety of Latin American Indigenous languages are spoken as well.<sup>10</sup> Rates of Indigenous language use are difficult to estimate because of inconsistent data collection, the tendency to identify Latino immigrants as Spanish-speaking regardless of their primary language, and some Latinos' reluctance to openly share their heritage or language due to experiences of discrimination and persecution linked to their Indigenous roots.<sup>11</sup> National data, however, suggest a sizeable and growing presence of Latino Indigenous peoples in the United States. Several Indigenous languages spoken in Mexico and various Central American countries (e.g., Mam, Quiche, Konjobal) are now among the 25 most common languages used in U.S. immigration courts.<sup>12</sup>

North Carolina has a diverse geography, from the mountains in the western part of the state to the coastal plains in the east. Hispanic residents live in all 100 counties of North Carolina and comprise 10 percent or more of the population in 24 counties.<sup>13</sup> While the largest numbers of NC Hispanic residents live in the state's urban centers, Hispanic density is highest in several rural counties.<sup>14</sup> Despite having a higher adult employment rate (71%) than the national Hispanic average (68%), Hispanic families in North Carolina are more likely to experience poverty and low incomes.<sup>14</sup> In NC, approximately 37 percent of Hispanic children younger than age 6 live in poverty, and 70 percent live in households with low incomes, compared to the national averages of 25 percent and 53 percent, respectively.<sup>15</sup>



## Further context on subsidy policy and practice

Variation across and within states in what child care subsidy programs require of families to successfully navigate the application process has been linked to differential participation rates among those who are eligible, often in ways that interact with applicants' demographic characteristics.<sup>16</sup> To the extent that policies and policy implementation practices add burden or cost for some groups to participate, relative to other groups—often referred to as *administrative burden or administrative exclusion*—they are likely to contribute to and perpetuate racial-ethnic disparities in receiving services.<sup>6,17</sup> In addition, increased stratification of immigrants by their legal status over the past 25 years in the United States has limited access to benefits for large numbers of eligible citizen children, a great many of whom are Hispanic.<sup>18,19</sup>

Hill, Gennetian, and Mendez's<sup>8</sup> innovative application of the administrative exclusion lens—which described how several CCDF policy dimensions decided at the state or local levels can differentially affect Hispanic parents' access to child care subsidies—more specially found that the types of documents required to determine subsidy eligibility (e.g., Social Security Numbers, proof of work hours documents, etc.) vary considerably across states. This potentially creates either a more restrictive or more favorable context for Latino families to apply.

Local administrative offices often may be families' primary or only point of contact for learning about the program, navigating the application and recertification process, and receiving child care subsidies. Information about how policies filter down to local practice can deepen our understanding of how state CCDF policy contexts affect program use and can help address noted racial-ethnic inequities, as can information how these policies are experienced by Hispanic and other families who are potentially excluded because of their race, ethnicity, or immigrant status.<sup>17</sup>

## More about our survey

Our online survey was administered to county-level frontline child care caseworkers and agency administrators (jointly referred to as *local subsidy staff* in this brief) working in communities across North Carolina, a fast-growing Hispanic population state (see Box 1). Although the survey was conducted in Spring 2021, in the context of the COVID-19 pandemic, this brief focuses on subsidy staff members' reports of their business-as-usual practices as they existed in the first quarter of 2020, before the pandemic. Specifically, we examined reported administrative practices related to four CCDF policy dimensions with potential implications for Hispanic families' subsidy access,<sup>8,20</sup> including the following: eligible qualifying activities, applicant prioritization, documentation requirements, and language availability of program information and resources. This study extends prior work by considering 1) the extent to which local practices implemented on the ground align with state policy and guidance as they exist more officially, 2) which implementation practices are likely to increase or reduce administrative burdens for Hispanic families seeking child care assistance, and 3) whether perceptions and practices vary across staff in different roles.



## North Carolina's Subsidized Child Care Assistance Program

The lead agency for North Carolina's Subsidized Child Care Assistance (SCCA) program is the NC Division of Child Development and Early Education (DCDEE) within the NC Department of Health and Human Services (NCDHHS). Some portion of subsidy dollars also flows from and through the Smart Start/North Carolina Partnership for Children.<sup>c</sup> The NC child care subsidy system is centralized in that all CCDF program rules and policies are set by the state, except those pertaining to waiting lists; local agencies are responsible for maintaining waiting lists and establishing a process and priorities for the order in which families will be served. Subsidy implementation and service delivery are decentralized, however: Applications, eligibility determination, and subsidy administration happen via county-level Department of Social Services (DSS) and/or Smart Start offices.<sup>21</sup>

Families living in NC are eligible for child care assistance if they meet both of the following: 1) financial criteria, which is generally determined as household income at or below 200 percent of the federal poverty level (FPL) for children from birth to age 5, and at or below 133 percent FPL for children ages 6 to 12; and 2) situational criteria, meaning they have a need for child care services because of parental employment, job search or training, education, TANF- or SNAP-related activities, child's disability status, involvement with CPS or welfare services, or experiencing a family crisis.<sup>22</sup>

Each month, the SCCA program serves an average of 49,900 children in 31,200 families.<sup>23</sup> Most subsidy recipients in NC attend center-based care (86%) and are served in settings rated as good quality.<sup>24</sup> This partly reflects the state's tiered quality rating and improvement system (QRIS), which reimburses providers at higher rates for higher-quality ratings and restricts subsidy payments to licensed providers with a 3-, 4-, or 5-star rating within the QRIS (the only state in the United States to do so).<sup>20</sup> The standard co-pay amount for families receiving child care assistance in NC is 10 percent of household income,<sup>24</sup> which exceeds the federal child care affordability guideline of 7 percent or below.<sup>25</sup> Funding levels for the SCCA program are insufficient to meet the need for child care assistance in the state. It is estimated that the program serves roughly 17 percent of state-eligible children<sup>26</sup> and, in 2019, the waiting list of applicants was as high as 40,000.<sup>27,28</sup>

Hispanic households in North Carolina are over-represented among those who may benefit from child care assistance, yet under-represented among those served by the program. While Hispanic children comprise roughly 18 percent of the state's young child population (birth to age 5), they make up 26 percent of the NC's low-income child population<sup>29</sup>—but only 5 percent of NC's subsidy recipients.<sup>5</sup> A recent evaluation of CCDF access by race and ethnicity estimates that less than 3 percent of state-eligible Hispanic children receive subsidies nationwide.<sup>30</sup>

## Results

For each aspect of the subsidy application process examined in this brief—qualifying activities, documentation, prioritization of recipients, and language availability of program information and resources—we describe local subsidy staff perceptions and reported practices and consider how these align with official state policies and rules according to the 2019-2021 NC CCDF plan<sup>21</sup> and state policy manual as captured in the CCDF Policies Database.<sup>20</sup>

### Qualifying activities for CCDF eligibility

Local subsidy staff were given a list of activities and were asked which activities qualify a family to receive child care assistance and how common these activities are among applicants in their local service area. In Figure 1, the overall bar indicates the share of staff who endorsed the item as a qualifying activity and the shading captures staff reports of whether the activity is common for all applicants, especially common for Hispanic applicants, especially common for non-Hispanic applicants, or uncommon for the applicants they serve.

For one set of policy-permitted activities (shown in the first six bars of Figure 1), we find general alignment between local subsidy staff perceptions and state policy in terms of what can qualify a family for child care assistance. First, subsidy staff universally agreed that parental employment is a qualifying activity and one that is common for the applicants they serve.

<sup>c</sup> Smart Start (SS) is North Carolina's statewide public-private partnership that provides services to children under age 6 and their families, including helping working families access child care. There are 75 local partnerships/SS offices across the state, with some partnerships serving more than one county. Local Smart Start/PFC programs may set enhanced eligibility criteria with their child care funds.

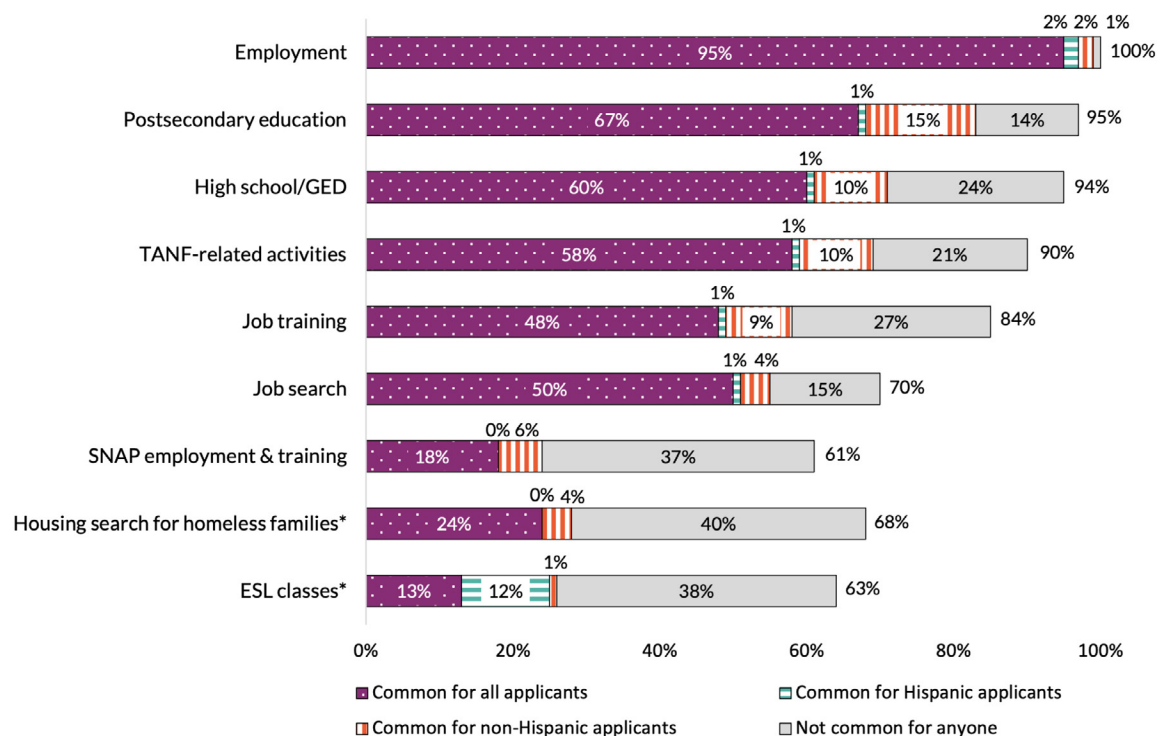
Most subsidy staff (80% or above) also identified secondary and postsecondary education, TANF-related activities<sup>d</sup> and job training as approved qualifying activities. Perceptions of how common these activities are among the applicants in their local service area varied across staff. For example, 60 percent reported it was common for their subsidy applicants to be in school pursuing a high school or GED diploma; 10 percent reported this as a common activity for their non-Hispanic applicants in particular; and 24 percent reported this was not a common qualifying activity for their applicants in general.

Second, local subsidy staff agreed less often about whether a second set of policy-permitted activities could qualify a family for child care assistance. Job search and SNAP-related employment and training activities<sup>e</sup> are approved at the state level, while only 70 percent and 61 percent of local staff identified these as acceptable qualifying activities.<sup>f</sup>

Finally, roughly two-thirds of subsidy staff identified housing search for homeless families (68%) and English as a Second Language (ESL) classes (63%) as approved activities even though these are not identified as such in state policy documents or the CCDF Rules Database.

In terms of their perceptions of the prevalence of different activities, most staff who identified job search as an approved activity also said it was common among their applicants. Many fewer reported housing search (28%), SNAP-related activities (24%), and ESL classes (26%) as common qualifying activities for their applicants. Approximately half of those who identified ESL classes as qualifying said this was a particularly common activity for the Hispanic families they serve.

**Figure 1.** Percentage of local subsidy staff who identify various activities as qualifying for child care assistance and their perception of how common these are among applicants they serve



**Source:** Data were collected by our research team during Spring 2021 using an online survey administered to North Carolina child care subsidy staff. Local staff reported on their business-as-usual practices as they existed in 2020, prior to the onset of the pandemic in the United States.

**Note:** Practitioners were asked how common each qualifying activity was for applicants and selected one of the following categories: common for Hispanic applicants, common for non-Hispanic applicants, common for all applicants, not common to anyone, or not approved. ESL = English as a Second Language. \* These are not policy approved activities in NC state policy documents, including CCDF Policies Database (2019) and online materials on NC DCDEE website.

<sup>d</sup> TANF-related activities include employment, job search, job readiness and job training (including on-the-job training), work experience, community service, high school/GED completion for teen parents, vocation educational training and post-secondary education (Division of Social Services, 2021).

<sup>e</sup> A subset of counties in North Carolina operate a [Food and Nutrition Services Employment and Training \(FNS E&T\) Program](#), which offers voluntary skills-based job training to eligible SNAP recipients.

<sup>f</sup> The NC CCDF Plan for 2019-2021 defines job training as “skills training” with the examples of welding, plumbing, or Nurse Assistant certification, or “Work First Employment Services training-related activities.” Education is defined as “(1) Continuation of elementary or high school within the local school system; (2) Basic education or a high school education or its equivalent. (3) Post-secondary for up to 20 months, and (4) job training as defined above.”

## Documents required or collected during the application process

Local subsidy staff and administrators were asked about the types of documents collected during the application process and whether these are required, requested but not required, or not required at all. Table 2 summarizes their responses along with information about the documentation requirements and guidance included in state-level policy documents. In alignment with state policy, the vast majority of county-level staff reported that documents verifying income (98%) and work hours (86%) are required as part of the application and that asset documentation (79%) is not required.

Regarding other documents gathered as part of the subsidy application process, state policy guidelines are less absolute, leaving room for discretion by local subsidy staff. According to the national CCDF Policies Database and the state's CCDF Plan for 2019-2021, in North Carolina, an applicant's statement is acceptable without documentation required to verify the following: the applicant's relationship to the child; the child's eligibility in terms of identity, age, and citizenship/immigration status; household composition; and applicant residence.<sup>20</sup> In addition, the NC Subsidized Child Care Services Manual states "The applicant's statement regarding citizenship or residency is accepted unless there is a reason to question the individual's legal status in the United States. If citizenship is questionable, a birth certificate or hospital/physician record is acceptable verification of the child's citizenship status." The manual does not provide further clarification or guidance regarding grounds to question legal status, which may leave this decision largely to individual staff perceptions and/or local office standard operating procedures.



Within this context of local office/caseworker discretion, most subsidy staff surveyed said they require or request several other types of documents from applicants, including those used to verify their home address (87% require, 7% request), relationship to the child (78% require, 9% request), household membership (70% require, 12% request), and citizenship status (60% require, 17% request). Notably, 47 percent of staff reported that Social Security Numbers (SSNs) are required as part of the application process, and an additional 37 percent noted that they request them. This diverges from state policy documents which note that SSNs may be requested but are optional for child-only cases, though they may be voluntarily provided by other applicants. Federal guidance is more explicit in prohibiting states from requiring SSNs as a condition of eligibility or receipt, noting that if they are requested on application forms, it must be clear that they are optional.<sup>31</sup>

Finally, birth certificates are not required by state policy, and most subsidy staff responses were consistent with this. A small share of subsidy staff, however, said that child birth certificates are required (20%) or requested (18%), and parent birth certificates are required (4%) or requested (16%).

## Documentation challenges for families

More than half (57%) of the surveyed local subsidy staff said that families have difficulty providing one or more types of documents required or requested during the application process, though the percentage reporting challenges varied widely across documents (Figure 2). Those who reported challenges were asked to identify whether they felt this was true for all families, for Hispanic applicants in particular, or for non-Hispanic applicants in particular. Few local subsidy staff reported documents as uniquely challenging for non-Hispanic applicants; instead, they tended to report them as challenging for all applicants or for Hispanic applicants in particular.

According to local subsidy staff, the documents most likely to be challenging for all applicants are those related to verifying income (38%) and work hours (33%). Some caseworkers felt that income verification (16%) and work hour verification (13%) were uniquely challenging for Hispanic applicants. In addition, just more than 20 percent of staff

reported that SSNs and citizenship status were especially difficult for Hispanic applicants to document. Statistical comparisons of responses by staff role suggest that administrators were less likely than local subsidy staff to perceive challenges for applicants related to verification of work hours, income, home address, and citizenship. Also, out of this list, the only required documents per CCDF policy for establishing eligibility for a CCDF subsidy include only the work hours and income verification.

**Table 1.** Documents collected during application process according to local subsidy staff and guidance in state policy documents

	As reported by local subsidy staff			Documentation required by NC CCDF policy?
	Required	Requested, not required	Not required	
Eligibility				
Income verification	98%	1%	1%	Yes
Work hour verification	86%	10%	4%	Yes
Documentation of assets	14%	8%	79%	No <sup>a</sup>
Household composition and personal information				
Current address (to verify residency)	87%	7%	6%	No <sup>b</sup>
Relationship to child	78%	9%	13%	No <sup>c</sup>
Household member verification	70%	12%	18%	No <sup>c</sup>
Citizenship status <sup>d</sup>	60%	17%	23%	No <sup>b</sup>
Social Security Number	47%	37%	16%	No <sup>e</sup>
Driver's license/state ID (for applicant identity)	17%	29%	54%	No <sup>c</sup>
Birth certificate of child(ren)	20%	18%	62%	No <sup>f</sup>
Birth certificate of adults	4%	16%	80%	No

**Source:** Data were collected by our research team during Spring 2021 using an online survey administered to North Carolina child care subsidy staff. Local staff reported on their business-as-usual practices as they existed in 2020, prior to the onset of the pandemic in the United States.

**Note:** <sup>a</sup> Applicants must declare on an application form that family assets do not exceed 1 million dollars, but no documentation needs to be collected.

<sup>b</sup> An applicant's statement is accepted unless there is a reason to question the individual's legal status.

<sup>c</sup> According to the NC CCDF Plan for 2019-2021, no documentation is required and an applicant's statement may be used as verification; the CCDF Policy Database for 2019 describes NC policy as "When documentation is not available, a client statement may be used as verification."

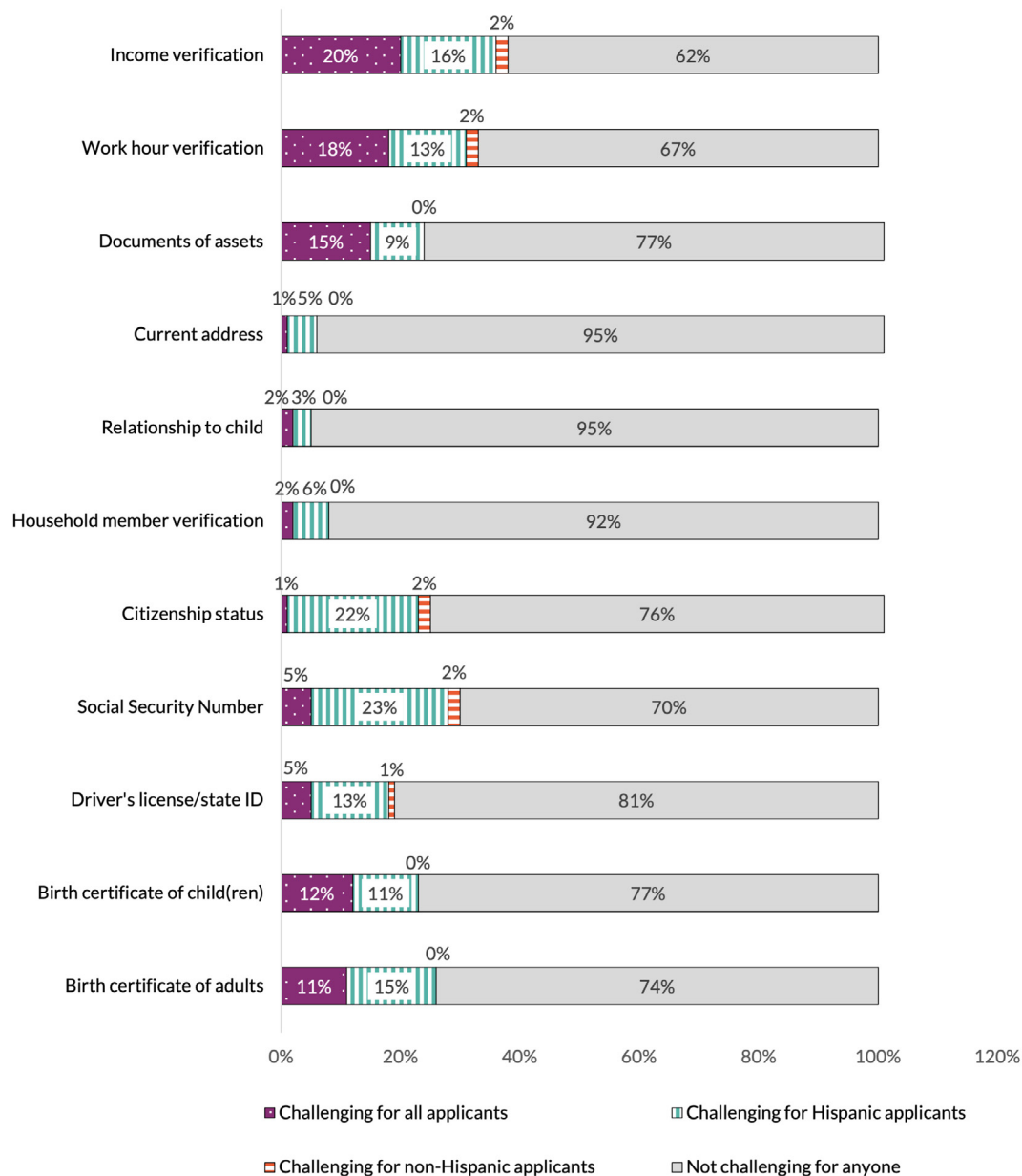
<sup>d</sup> Survey question did not specify child or applicant citizenship status documentation.

<sup>e</sup> The policy manual states that SSNs are not required to determine eligibility. An SSN may be entered by the caseworker for "child only" cases but this is noted as optional.

<sup>f</sup> Child's birth certificate is not required documentation, but it may be used as one form of verification for child citizenship. Sample sizes for the document items range from 156 to 179.



**Figure 2.** Local subsidy staff reports of documents that are challenging for families to provide



**Source:** Data were collected by our research team during Spring 2021 using an online survey administered to North Carolina child care subsidy staff. Local staff reported on their business-as-usual practices as they existed in 2020, prior to the onset of the pandemic in the United States.  
**Note:** Items about documentation of assets and adult birth certificates had significant missing data (valid data, n=69 and n=89), respectively). Sample sizes for the remaining items range from 107 to 165.

## Prioritized groups for child care subsidies

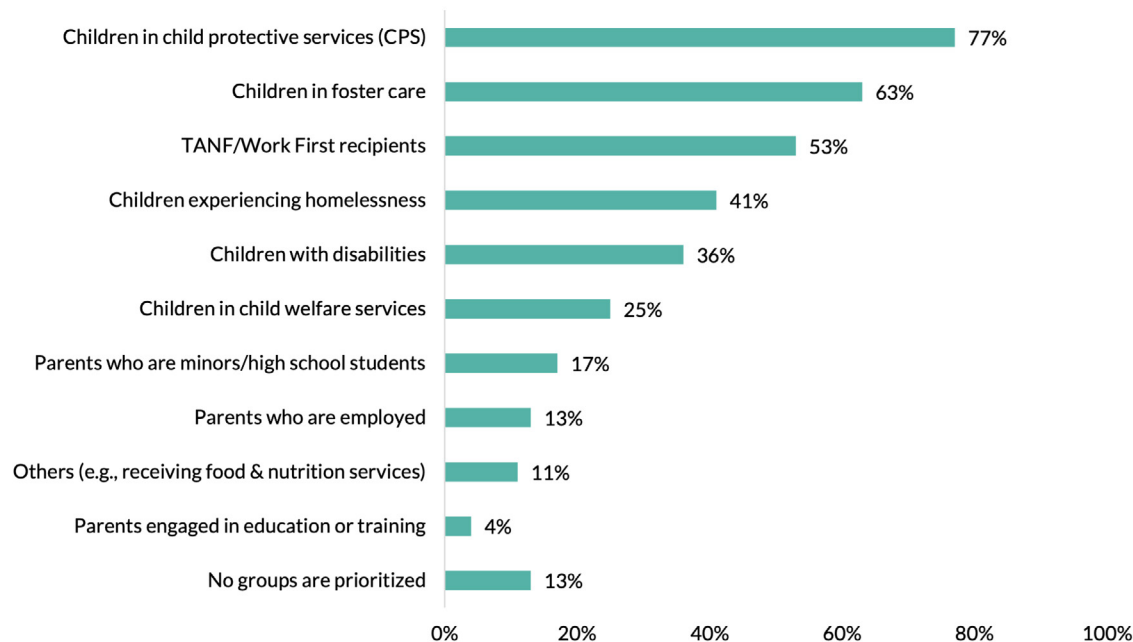
In the absence of sufficient funding to serve all eligible families who apply for child care assistance, states and/or local entities may deem certain groups of applicants as priority populations. This dimension of CCDF policy has been identified as one that may impact Latino families' access to subsidies depending on how they are likely to be represented in the prioritized household categories.<sup>8</sup>

According to state policy documents, North Carolina prioritizes (but does not guarantee funding for) the following groups: children in protective services, children in foster care, children with disabilities, TANF recipients, and homeless families.<sup>20</sup> Beyond these groups identified by the state, local agencies have discretion to "establish additional populations

to prioritize based on the needs of the individual county” and can also establish priorities for waiting lists, which are managed at the local level.<sup>21</sup>

Eighty-seven percent of county-level staff responded that their agency prioritizes certain families for child care subsidies, while thirteen percent said no groups were prioritized (Figure 3). There was widespread agreement that children in child protective services (77%) and foster care (63%) are prioritized populations. In addition, roughly half (53%) said that their agency prioritizes applicants in the TANF/Work First income assistance program and more than a third reported prioritizing children experiencing homelessness (41%) and those with disabilities (36%). Fewer staff identified minor parents (17%), employed parents (13%), and parents engaged in education or training (4%) as being prioritized for subsidies.

**Figure 3. Local subsidy staff reports of prioritized populations for child care subsidies**



**Source:** Data were collected by our research team during Spring 2021 using an online survey administered to North Carolina child care subsidy staff. Local staff reported on their business-as-usual practices as they existed in 2020, prior to the onset of the pandemic in the United States.

**Note:** Caseworkers and administrators were asked whether certain populations served by their agency are prioritized to receive child care subsidies. Those answering “yes” (n=141) identified which groups are prioritized by responding to a checklist of commonly prioritized groups, as well as an open-ended ‘other’ question.

## Language accessibility of program materials and resources

According to most surveyed staff, subsidy program materials and resources are generally available in Spanish (Table 3). More than half of local staff reported that Spanish-language program information materials (53%) and application materials (54%) are *very accessible* in person, and an additional 31 to 27 percent said these materials are *somewhat accessible*. Fewer staff reported that Spanish-language program information and the subsidy application are *very accessible* (40% and 33%) or *somewhat accessible* (31% and 23%) online. One potential benefit of having application materials available in Spanish online is that it may help Spanish-speaking families know what to expect and what information to gather to complete the application. Although a Spanish-language application form can be found on the lead state agency’s website ([here](#)), it is not available on the main [child care subsidy program webpage](#), which may make it difficult for staff and families to locate. This may explain why only 56 percent of local staff responded that Spanish-language application materials are available online.

Most local subsidy staff reported that they do have translation and interpreter services available to help them serve Spanish-speaking clients. More than 75 percent said these supports are either *very* or *somewhat accessible* on site or by phone as needed. As noted in the survey sample description, very few staff (5%) considered themselves fluent in Spanish, and most (72%) reported speaking no Spanish at all. The limited availability of bilingual staff means that translation and interpreter services are a key resource for local staff serving Spanish-speaking families.

According to surveyed staff, program resources in Indigenous Latin American languages are considerably less accessible, which is a barrier to serving these families effectively (Table 3). Fewer than one-fifth of those surveyed said that families could access information or application materials in an Indigenous language in person or online. Fewer than a third reported having access to translation or interpreter services on site, though 42 percent said they could access these services for Indigenous languages by phone if needed.

**Table 2. Accessibility of program materials in Spanish and Indigenous Latin American languages**

	Spanish		Indigenous Language(s)	
	Very accessible	Somewhat accessible	Very accessible	Somewhat accessible
Information materials in person	53%	31%	12%	10%
Application materials in person	54%	27%	14%	10%
Information materials online	40%	31%	9%	11%
Application materials online	33%	23%	10%	9%
On site full-time translation/interpreter services	58%	16%	17%	8%
On site translation/interpreter services as needed	65%	13%	20%	9%
Phone translation/interpreter services as needed	76%	14%	42%	15%

**Source:** Data were collected by our research team during Spring 2021 using an online survey administered to North Carolina child care subsidy staff. Local staff reported on their business-as-usual practices as they existed in 2020, prior to the onset of the pandemic in the United States.

**Note:** Sample size for individual items ranges from 152 to 170.

## Conclusion

Studies of cross-state variation in CCDF policy features and administrative practices highlight how these create differential access to child care assistance and, further, how administrative burdens tied to state policy choices may reduce program participation among eligible Latino families.<sup>8,30</sup> A recent policy scan of 13 states with the largest populations of Hispanic children in low-income households revealed considerable state-level variability around CCDF eligibility, application documentation requirements, prioritization of recipients, and availability of program information online in Spanish. The current study builds on this work by examining the additional variability and administrative burden that can be introduced at the local level, as frontline subsidy staff interpret and implement state CCDF policies. To better understand within-state variation in CCDF implementation practices and the potential implications for Hispanic families' engagement with the program, we surveyed county-level subsidy staff and administrators in North Carolina, a state with a rapidly expanding Hispanic population that now numbers more than 1 million people. In North Carolina, all CCDF policies and rules are set at the state level (except for waiting list procedures) but are implemented through local agency offices across 100 counties.

**Overall, our findings suggest that subsidy administration practices “on the ground” sometimes vary from state policies as they are “on the books”** in ways that may create administrative exclusion and constrain low-income Hispanic parents' access to child care assistance. While some staff-reported practices could be considered more facilitative of access than official state policy, many staff described practices that likely create a more restrictive environment for Hispanic families due to administrative burden.

**In terms of the activities that qualify a family for child care assistance, we find general alignment between local subsidy staff and written state policy**, though employment was the only activity for which there was complete consensus. According to a 13-state scan of policies “on the books,” North Carolina is one of seven states that do not approve child care assistance for English as a Second Language (ESL) classes, which may disproportionately exclude Latino families.<sup>8</sup> Our survey results indicate, however, that more than 60 percent of county-level staff perceive ESL classes to be a qualified activity, which may signal a broader view of eligibility “on the ground” at the local level. At the same time, fewer than three-fourths of local staff considered job search and SNAP-related activities as approved, even though these are allowable by state policy, which may mean that some eligible families are turned away.

**Our survey results suggest documentation as a key area where many local subsidy caseworkers and administrators engage in more restrictive practices than exist in official state policy.** Consistent with North Carolina's effort to streamline the verification process to improve access,<sup>32</sup> official state policy requires documentation primarily only for work hours and income. Yet, a majority of local subsidy staff reported to us that they require or request a range of other documents from applicants. Moreover, many local staff said that these documents can be challenging for Hispanic families to provide, further suggesting administrative burden as a deterrent for Hispanic families during the application process. For example, we find that more than 80 percent of local staff say they require or request citizenship documentation, as well as Social Security Numbers, as part of the application process. This practice imposes additional administrative burden on Hispanic parents who may have concerns about disclosing family members' immigration status, particularly among mixed-status families.<sup>18</sup> According to federal policy, only the child's citizenship and immigration status are to be considered as part of the application, and there is no specific requirement for documentation of these; in fact, federal guidance directs states to be clear in their application materials that Social Security Numbers are not required.<sup>33</sup>

**Our findings of restrictive local administrative practices around documentation are consistent with historical work showing how the design and administration of safety net programs have been shaped by distrust of low-income families** (particularly low-income families from minoritized groups) to create structures and systems focused on compliance and monitoring for fraud.<sup>34,35,36,37</sup> One study of state efforts to improve child care subsidy access following the reauthorization of CCDF in 2014 highlighted some resistance by county-level staff in North Carolina to adopt state-level guidance intended to streamline verification policies and reduce documentation requests.<sup>32</sup> Parents who are aware of the extensive documentation requested as part of the subsidy application may forgo seeking needed services or experience high psychological and compliance costs if they decide to apply.<sup>5</sup> In addition, because Hispanic families are a rapidly growing population within the state but still represent a small number of subsidy applicants, less experience with inclusive language and practices among local subsidy staff may negatively impact the likelihood that Hispanic families complete the application process. To ensure equity in the application process, North Carolina subsidy offices could update application materials by removing questions that are not required by policy. Additional and routine staff training related to verification and documentation policies and practices would also be a proactive strategy to address issues of administrative exclusion.

In the context of insufficient funding to serve all families who are eligible for child care assistance, states and localities are permitted to prioritize certain households. **In North Carolina, state-level priorities include children in protective services, children in foster care, children with disabilities, and participants in the TANF/Work First program,** and local agencies are allowed to set additional priorities to align with community needs. Our survey results suggest that most but not all county-level staff are aware of state priority categories and that some local offices include other applicants among their priorities, such as those experiencing homelessness and children of minor parents. **Prioritization policies and practices may have implications for Hispanic families' access to child care subsidies depending on their representation within prioritized categories.** For example, prioritizing TANF recipients has been highlighted as a common state practice that may disproportionately constrain Latino household from applying for and receiving subsidies given their underrepresentation in this program.<sup>8</sup> In North Carolina, Hispanic children make up approximately 24 percent of the low-income child population, but only 9 percent of TANF/Work First recipients are Hispanic.<sup>38</sup> The extent to which prioritization of TANF participants displaces non-TANF applicants may be limited given that only 6 percent of NC's subsidy recipients in 2019 also received Work First benefits.<sup>39</sup> At the same time, many of the public-facing child care subsidy program webpages and materials in NC mention prioritizing Work First participants, which may deter non-TANF recipients from applying, especially given the state's sizeable subsidy waiting list. Further research should examine Latino parents' understanding and impressions of the subsidy program and to what extent their decision to apply is influenced by perceptions of how likely they are to receive assistance.

**Nationally, approximately 1 in 4 low-income Hispanic children live in a linguistically isolated household in which no adult is proficient in English<sup>40</sup>, suggesting language is a significant factor to consider in reducing administrative burden.** Our findings suggest that, in North Carolina, subsidy program information and application materials may not yet be fully accessible to families whose primary language is not English. Although three-fourths of surveyed county-level staff felt they could access Spanish translation and interpreter services when needed, nearly half said Spanish-language application materials were not available online, and only 5 percent described themselves as fluent in Spanish, limiting opportunities for outreach and engagement with Spanish-speaking families. The 13-state CCDF policy scan identified NC as one of two states without Spanish-language subsidy program materials readily available



online.<sup>8</sup> Our finding that nearly half of the surveyed staff said these were available could reflect personal knowledge of how to access translated materials when needed or an assumption that these resources exist when they do not. Notably, local staff reports suggest substantial language barriers for Latino families who speak Indigenous languages. Fewer than one-fourth of those surveyed said Indigenous language materials were available, and fewer than half felt they could access translation or interpreter services in these languages if needed. As Latin American Indigenous populations in the U.S. continue to grow, it will be important for states to attend to more diverse language needs. In North Carolina, more robust access to subsidy program materials in a variety of languages and greater awareness of the resources that currently exist (e.g., Spanish language materials online) could facilitate a more equitable application process for Latino families.

**Overall, our survey of staff perceptions of CCDF policy and approaches to implementation highlights potentially important variation in how key aspects of the child care subsidy application process are enacted by local agencies. The study also identifies the use of some restrictive practices that may hinder Latino families' participation in the CCDF subsidy program.** As has been suggested elsewhere, variation in policy implementation due to staff misinterpretation, misunderstanding, or lack of awareness of cultural factors and inclusive practices can compound administrative burdens that may already exist within written policy. Future research should examine factors that can help caseworkers select more inclusive versus restrictive practices. For example, technical support and professional development for caseworkers and local administrators, especially in locations with high Hispanic growth, may support more equitable access. Researchers may partner with state agencies to help identify and test strategies for reducing administrative burden for Hispanic populations.

**Reducing administrative burdens in providing social services has been identified as a key federal strategy for promoting equity** given the long-standing disproportionate impact of such burdens on Black, Brown and immigrant communities.<sup>37,41,42</sup> The 2021 Executive Order 14058, *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*,<sup>43</sup> directs federal agencies to transform the design and delivery of government services to be more easily and equitably navigated by those they are intended to support, with particular attention to those who have been historically underserved. As one potential example of how this goal might be achieved, the NC Department of Health and Human Services recently established a new position, Director of Hispanic/Latinx Policy and Strategy, to ensure that the Hispanic/Latinx community is included in the design and implementation process for the department's programs. This initiative provides new opportunities to make the state CCDF program more responsive to Hispanic families and is consistent with the aims of the federal Executive Order to have government agencies increase their engagement with parents and community members to identify barriers and develop more equitable, inclusive practices.



## Methodology

**Local CCDF subsidy staff survey.** As part of a larger multi-method study of child care subsidy implementation and Hispanic families' access to the program, county-level frontline caseworkers and administrators completed an online survey from April to June 2021. Through a series of closed- and open-ended items, subsidy staff were asked about their practices and experiences helping families apply for child care subsidies (before and during the COVID-19 pandemic), as well as about their perceptions of challenges, opportunities, and strategies for engaging Hispanic families who might benefit from child care assistance. The frontline caseworker and administrator versions of the survey shared most items in common, although only caseworkers were asked about their caseload characteristics and only administrators were asked questions about agency operations. One section of the survey asked about staff practices and experiences during the first quarter of 2020, before the COVID-19 pandemic, while a second section asked staff about their current practices and experiences (first quarter of 2021), as communities continued to be impacted by the pandemic. This brief reports on data from the pre-pandemic questions only to help describe what business-as-usual practices looked like before widespread global pandemic disruptions.

**Review of state CCDF policy documents.** The focus of this brief is on local subsidy staff perceptions and practices as reported in the survey; however, our descriptive analysis also considers how these perceptions and practices correspond to state-level CCDF policies and implementation guidance. Our primary source of policy information for this comparison is the CCDF Policies Database as of October 1, 2019.<sup>20</sup> The CCDF Policies Database, funded by the Administration for Children and Families (ACF) Office of Planning, Research, and Evaluation, contains detailed information from state CCDF caseworker manuals and other policy documents, which is then verified with state program administrators. In some cases, to clarify our own understanding or obtain more detail about the information in the Database, we directly consulted the following documents: the [NC CCDF Plan for 2019-2021](#) submitted to the ACF Office of Child Care; the [NC Subsidized Child Care Services Manual](#) and administrative updates; and the [Subsidized Child Care Rules](#) as stated in the North Carolina Administrative Code (NCAC).

**Sample and recruitment.** In North Carolina, subsidies are administered at the county level primarily through Department of Social Services (DSS) offices (see Box 2). However, in approximately 40 percent of counties, families can also apply for and receive subsidies through their local Smart Start/Partnership for Children (PFC) offices. In the remaining 60 percent of counties, Smart Start subsidy dollars are redirected to DSS offices to administer.<sup>9</sup> Thus, the target population for the local subsidy staff survey included DSS frontline caseworkers and administrators from all 100 counties and Smart Start subsidy staff from the subset of counties where subsidies are administered through local PFC offices (whose service area often includes multiple counties). With an average of 2 to 3 workers and 1 administrator per agency office, the estimated pool of potential respondents was approximately 350. In March and April 2021, information about the study and an invitation to participate were shared with county-level staff through communications from their respective state-level agencies. As part of recruitment, research staff also followed up with local offices to ensure they had information about the study and a link to the online survey for workers who wanted to voluntarily participate.

A total of 189 subsidy workers in 83 (out of 100) counties across North Carolina participated in the survey, an estimated response rate of approximately 54 percent. Participating counties were in each region of the state representing a wide variety of rural, suburban, and urban communities. Combined, these counties are home to more than 95 percent of North Carolina's Latino population. Mean comparisons across participating and non-participating counties suggest no differences in terms of geographical region or poverty density; however, non-participating counties had lower percentages of Hispanic residents on average (none was over 10%) than participating counties, and all were rural, except for one suburban county.

Approximately two-thirds of the survey respondents were frontline caseworkers (n=118), and one third were administrators or supervisors (n=71); for ease, we use the term "local subsidy staff" to refer to these two groups combined. Staff who performed both frontline and administrative duties within their agencies (n=17) were categorized as frontline caseworkers for the purpose of this brief given their experience working directly with applicants and information they provided about their caseload.

Characteristics of the staff who participated in the survey are shown in Table 1. Ninety-one percent of respondents worked at county DSS offices, and 9 percent worked in Smart Start agencies. More than half of the caseworkers (51%) had extensive work experience (i.e., 7 or more years) within their agencies. About 5 percent self-identified as native or

<sup>9</sup> Smart Start offices may specify other reasons to provide subsidized child care if Smart Start provides funds to DSS offices. However, Smart Start funds can provide services to preschool age children only, and the plan must be approved by the North Carolina Partnership for Children.

fluent Spanish speakers and 4 percent as being Hispanic or Latino. There were no statistically significant differences in demographic characteristics between frontline staff and administrators. Notably, nearly all responding frontline staff reported working with Hispanic applicants, and more than half said that 11 percent or more of their caseload was Hispanic.

**Analysis.** The statistics reported in this brief are simple frequencies indicating the share of local agency staff who endorsed each response. In general, we present the findings collapsed across frontline staff and administrators because their responses were largely similar. Tests of group mean differences by staff role across all the survey items yielded only a few statistically significant differences ( $p < .05$ ), which we note in the text.

**Table 3.** Characteristics of North Carolina local subsidy staff survey participants

	All staff (N=189)	Frontline caseworkers (N=118)	Administrators (N=71)
<b>Primary role</b>			
Frontline staff	53%	86%	0%
Administrator	38%	0%	100%
Both frontline and administrator duties	9%	14%	0%
<b>Type of agency</b>			
Department of Social Services (DSS)	91%	92%	89%
Smart Start/Partnership for Children (SS)	10%	9%	11%
<b>Years working at the agency</b>			
Less than 1 year	10%	10%	9%
1-3 years	20%	19%	21%
4-6 years	20%	20%	21%
7-10 years	14%	14%	14%
More than 10 years	37%	37%	35%
<b>Percentage of individual caseload that was Hispanic<sup>a</sup> (January – March 2020)</b>			
0%	--	3%	--
1-10%	--	46%	--
11-20%	--	26%	--
Higher than 20%	--	25%	--
<b>Spanish proficiency<sup>b</sup></b>			
Does not speak Spanish	72%	72%	71%
Minimal speaking skills	22%	18%	26%
Somewhat fluent	2%	3%	0%
Fluent, non-native speaker	1%	1%	2%
Native speaker	3%	5%	2%
<b>Self-identifies as Hispanic/Latino</b>			
Yes	4%	5%	1%

**Source:** Data were collected by our research team during Spring 2021 using an online survey administered to North Carolina child care subsidy staff. Local staff reported on their business-as-usual practices as they existed in 2020, prior to the onset of the pandemic in the United States.

**Note:** Respondents who served in a dual role of frontline staff and administrator are included in the frontline staff statistics because of their direct work with families. Except for the two variables noted below, all other variables reported in this table had no missing data.

<sup>a</sup> Administrators did not complete items about individual caseload characteristics. Among caseworkers, the reported percentage is based on those with valid data for this item ( $n=89$ ).

<sup>b</sup> Percentages for Spanish proficiency are based on cases with valid data for this item ( $n=149$ ).

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**Designer:** Catherine Nichols

Study data were collected and managed using REDCap electronic data capture tools hosted at University of North Carolina at Greensboro.<sup>1,2</sup> REDCap (Research Electronic Data Capture) is a secure, web-based software platform designed to support data capture for research studies, providing 1) an intuitive interface for validated data capture; 2) audit trails for tracking data manipulation and export procedures; 3) automated export procedures for seamless data downloads to common statistical packages; and 4) procedures for data integration and interoperability with external sources.

## About the Authors

**Ying-Chun Lin, Ph.D.**, is a research scientist in Early Childhood program area at Child Trends. Her research focuses on factors that affect access to high-quality early care and education for children in low-income families and immigrant families and how policies can support children's well-being. She carried out this work while a post-doctoral fellow with the National Research Center on Hispanic Children and Families under the mentorship of Drs. Crosby and Mendez.

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## About the Center

The National Research Center on Hispanic Children & Families (Center) is a hub of research to help programs and policy better serve low-income Hispanics across three priority areas: poverty reduction and economic self-sufficiency, healthy marriage and responsible fatherhood, and early care and education. The Center is led by Child Trends, in partnership with Duke University, University of North Carolina at Greensboro, and University of Maryland, College Park. The Center is supported by grant #90PH0028 from the Office of Planning, Research, and Evaluation within the Administration for Children and Families in the U.S. Department of Health and Human Services.

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