De Jure Policy Design and *De Facto* Implementation of Cash Assistance Programs: Evidence of differential receipt among Latino Families

Lisa A. Gennetian*
Duke University, Sanford School of Public Policy

Marcos A. Rangel
Duke University, Sanford School of Public Policy

Dana Thomson
Child Trends

Christina Padilla
Child Trends

Prachi Shukla
Duke University, Sanford School of Public Policy

Luis Basurto
Cornell University

JEL codes: *D1, D3, D6, H3, H53, H70, I38, J18*

Acknowledgments

*Corresponding author, lisa.gennetian@duke.edu. We thank Santiago Deambrosi, Kelly Evans, Carlos Salas Flores, and Jessica On for their analytic and research support, and the National Research Center on Hispanic Children and Families and the William T. Grant Foundation for financial support. The National Research Center on Hispanic Children and Families is supported by the Administration for Children and Families (ACF) of the United States (U.S.) Department of Health and Human Services (HHS) as part of two financial assistance awards (Award # 90PH0028, from 2018-2023, and Award # 90PH0032 from 2023-2028) totaling $13.5 million across the two awards with 99 percent funded by ACF/HHS and 1 percentage funded by non-government sources. The contents are those of the authors and do not necessarily represent the official views of, nor an endorsement, by ACF/HHS, or the U.S. Government. For more information, please visit the ACF website, Administrative and National Policy Requirement. The authors are solely responsible for interpretation and findings presented in this manuscript.

Abstract

Economic evaluations of the receipt of social assistance programs typically focus on the effect of *de jure* program design (policy intent). With novel survey data from practitioners across 11 U.S. states, this study offers a first combined look at *de jure* and *de facto* implementation features of basic cash assistance programs. We pay particular attention to the differential influence those have among Latino families with children, the largest group residing in poverty but yet receiving social assistance at lower rates than peers. We find that both *de jure* policies and *de facto* implementation practices that minimize operational costs –as posited by economic theories of resource allocation-- reduce cash assistance receipt rates across all households with children. *De jure* policies that increase administrative burden also reduce cash assistance receipt but less precisely than policies that minimize operational costs; collectively *de facto* practices have a larger impact on cash assistance receipt rates than *de jure* policies. Reductions on cash assistance receipt in response to *de jure* policies and *de facto* practices that minimize operational costs are largest among Latino households with children; de facto practices that increase administrative burden on the other hand have the largest effects among non-Latino households. Findings are robust to controls for family, household, and state-level characteristics.

Social assistance programs in the United States provide financial support for families with low incomes, reducing the harmful impacts of poverty and supporting children's future health and human capital (Aizer et al., 2022; Hoynes and Schanzenbach, 2018; NASEM, 2019, 2024; Page, 2024). Nevertheless, participation remains incomplete: not all families who are eligible for these programs apply for benefits, and not all those who apply receive them (Falk et al., 2015). Benefit receipt rates vary across programs, geography, and demographic groups (Bitler et al., 2021; Gennetian et al., 2025; Macartney and Ghertner, 2021; Minton and Giannarelli, 2019; Moffitt and Gottschalk., 2001). Understanding the reasons for this variation is crucial for informing public policy investments in order to attend to the efficiency of public spending and the distributional impacts of social assistance programs.

Research on incomplete uptake of social assistance programs has primarily focused, within the field of economics, on questions of misreporting and compliance, particularly in how the latter influences poverty reduction and related government costs (see, for example, Meyer and Mittag, 2019). This work typically adopts a *de jure* perspective, with a focus on how formal policy design impacts participation and is often guided by economic theories about people's evaluations or strategic choices in the context of available information. While this *de jure* economic framework focused on policy intent offers valuable insights, it may not fully explain observed patterns of benefit stratification along population and context features, particularly when considering variation within income-eligible populations. Indeed, Ko and Moffitt (2022) show that incomplete uptake of social assistance programs and benefits is not unique to the U.S. but indeed exists across the world and that this variation goes beyond plausible explanations implied by economic-informed *de jure* policy evaluations of people's probable gains over costs.

Regulation and legislation provide guidance on program parameters for implementation, monitoring and accountability; however, how policies are operationalized and implemented by program administrators and frontline workers (herein referred to as practitioners) also create meaningful variation in people's experiences with program access and participation. In the context of social assistance programs, such *de facto* implementation practices include administrative procedures related to application processing, documentation requests, language accessibility, office hours and locations, staff training, and client-worker interactions (Gennetian et al., 2020). Although both *de jure* and *de facto* assessments of economic issues exist in realms of political economy and trade (Ezat and Zaki, 2022) and in the role of institutions (Acemoglu and Robinson, 2006), analyses of *de facto* approaches to U.S. social assistance programs to date have primarily been conducted via qualitative studies of recipient experiences and through the framework of administrative burdens (see, for example, Alvira-Hammond and Gennetian, 2015; Barnes et al., 2023; Amerikaner et al., 2025; Moynihan et al., 2016).

Both *de jure* and *de facto* perspectives are particularly relevant in the case of basic cash assistance in the U.S., which was dramatically transformed in 1996 when administration became decentralized from federal authority to states and localities in the form of block grants. Devolution of this extreme is not present in all U.S. social assistance programs; however, over the last two decades, states and localities increasingly respond to federal policies with state or local specific design aspects or complementary programs. Prominent examples include state flexibilities in setting income limits and related eligibility criteria across states for the SNAP

food assistance and Medicaid programs, and the growth of state earned income tax credits[1] (now present in 31 states) and child tax credits (offered by 16 states).[2]

Resulting variation in the design features of state and local programs has been used as natural experiments for examining how *de jure* policy design affects program participation and benefit receipt. For example, more frequent SNAP recertification requirements reduce participation, with each additional month between recertifications increasing participation by 2-3 percentage points (Ganong and Liebman, 2018). States with stricter TANF policies – including work requirements and sanctions – show lower participation rates and higher rates of child welfare involvement (Ginther and Johnson-Motoyama, 2022). Similar patterns emerge in the State Children's Health Insurance Program, where state policy choices about waiting periods, asset tests, and application procedures influence enrollment (Bansak and Raphael, 2006). And in tax policy, states that introduced electronic filing programs had increased uptake of the Earned Income Tax Credit (Kopczuk et al., 2007).

De facto dimensions –capturing the operational, on the ground, elements of program implementation over which human and social service administrators and workers have discretion– are largely unexplored. Variation at this level includes the types and frequency of outreach strategies, application processing procedures, documentation requested and used, and staff training. One hurdle in examining *de facto* factors is data as it requires granular information on the experiences, practices and perspectives from state and local authorities, or practitioners.

This study examines how both formal *de jure* policies and *de facto* practices affect cash assistance receipt, with particular attention to Latino families. We draw on findings from companion work, in which we document substantial heterogeneity across U.S. states in social assistance receipt and, via a decomposition analysis, show that this variation cannot be fully explained by state differences in poverty rates (Gennetian et al., 2025). The stratification of receipt by Latino ethnicity is particularly pronounced for basic cash assistance and especially so among Latino households with the lowest income (i.e. 50% of FPL), raising the possibility of the role of *de facto* features as particularly consequential.

Using novel survey data from program administrators and frontline workers across 11 states, we document the empirical relationship between both formal policies and implementation practices, respectively, and basic cash assistance receipt. These states –which include Arizona, California, Colorado, Connecticut, Louisiana, Nevada, New Mexico, North Carolina, Oregon, Pennsylvania, and one anonymous state– are home to 45 percent of all Latino children in the United States. We find that both *de jure* policies and *de facto* implementation practices that minimize operational costs –as posited by economic theories of resource allocation-- reduce cash assistance receipt rates across all households with children. *De jure* policies that increase administrative burden also reduce cash assistance receipt but less precisely than policies that minimize operational costs; collectively *de facto* practices have a larger impact on cash assistance receipt rates than *de jure* policies. Reductions on cash assistance receipt in response to *de jure* policies and *de facto* practices that minimize operational costs are largest among Latino households with children; *de facto* practices that increase administrative burden on the other hand have the largest effects

[1] https://www.ncsl.org/human-services/eitc-enactments

[2] https://www.ncsl.org/human-services/child-tax-credit-overview

among non-Latino households. Findings are robust to controls for family, household, and state-level characteristics.

This study makes several distinct contributions to the literature. First, we extend frameworks previously applied in macroeconomics and trade policy to analyze U.S. social assistance programs, developing indices capturing *de jure* policies and *de facto* practices. We developed two indices to capture administrative burden from both a *de jure* and *de facto* perspective: (1) a basic cash assistance policy administrative burden index ("policy administrative burden index"), which reflects potential administrative burdens posed by state TANF cash assistance policies related to application processes and documentation and compliance requirements (normed across all states and the District of Columbia); and (2) a basic cash assistance practice administrative burden index ("practice administrative burden index"), which reflects potential administrative burden posed by TANF cash assistance on-the-ground practices, as conveyed by administrators and frontline workers such as outreach, agency staff hiring, and staff training practices (normed across the 11 states that participated in our survey; We deploy a similar approach to construct two cost minimization indices as guided by economic theory: one reflective of official *de jure* program rules and the second of *de facto* practices.

Second, we quantify state variation in both *de jure* policy design and *de facto* practices and cash assistance benefit receipt rates. While previous research has examined specific policy features or implementation practices in isolation (Gianella et al., 2024; Linos et al., 2022), our multi-dimensional approach captures how various aspects of program design and delivery work in concert in influencing receipt rates.

Third, we focus specifically on implications for Latino families with children, a population that faces unique barriers to program participation despite high rates of poverty. Latino children now represent the largest racial/ethnic group of children in poverty (Shrider, 2024), making their families' lower program participation particularly concerning for both current well-being and future outcomes (Bitler et al., 2021). Our analysis adds to the existing research documenting lower participation rates among Latino families across various social assistance programs, including basic cash assistance (Gennetian et al., 2025), refundable tax credits (Thomson et al., 2022), unemployment insurance (Nichols and Simms, 2012) and the first round of COVID-19 stimulus payments (Chen et al., 2021).

Cash assistance and Latino households with children

Despite being the largest racial or ethnic group of children living in poverty (Shrider, 2024), Latino families have consistently lower participation rates in means-tested and related social assistance programs compared to other racial and ethnic groups with similar economic circumstances (Bitler et al., 2021). This participation gap raises important questions about program design and implementation, particularly as Latino children now comprise one in four children under age 19 in the United States.

Several structural features of Latino households may interact with both *de jure* program requirements and *de facto* practices to affect participation. While 94% of Latino children are U.S.-born citizens., about half have at least one foreign-born parent and up to one in four live with an unauthorized immigrant parent (Clarke et al., 2017). These characteristics alone may not

affect eligibility for citizen children and other eligible household members; however, they can create additional complexity in both formal application requirements and day-to-day program administration. For example, formal policies regarding household member documentation requirements can create *de jure* barriers when families must provide citizenship verification or related information for non-applicant household members (East, 2020). Similarly, income-pooling rules can impact eligibility when states assume all household members share resources, disproportionally affecting Latino families who may have separate economic units within the same household or send remittances to family members abroad (Bitler et al., 2021; Fix and Zimmerman, 2001; Landale et al., 2011). Other types of state policies – such as public charge rules and Secure Communities programs involving local law enforcement cooperation with Immigration and Customs Enforcement (ICE) – have also been found to deter participation in social assistance programs among U.S. born children living in immigrant households (Alsan and Yang, 2024; Capps et al., 2020; Haley et al., 2020).

At the implementation level, *de facto* practices create additional opportunities and challenges in program accessibility for Latino families. Local offices vary substantially in their provision of language services, cultural competency training, and outreach strategies (Alvira-Hammond and Gennetian, 2015; Heinrich et al., 2022). These practices can create meaningful differences in program experiences even under identical formal policies. They may also interact with formal policies. The interplay between these *de jure* and *de facto* dimensions is particularly evident in documentation requirements - while formal policies may specify what documentation is needed, local offices exercise considerable discretion in how they verify and process these documents, what alternative forms of proof they accept, and what assistance they provide to families gathering required paperwork (Barnes et al., 2023; Barnes and Gennetian, 2021). Further, these barriers can compound: Latino families may face challenges not only in interpreting complex eligibility rules in English but also in navigating verification processes at offices with limited Spanish-language capacity or cultural understanding of complex household arrangements (Fix and Zimmerman, 2001; Landale et al., 2011). The cumulative effect of these barriers may help explain why Latino families' program participation rates remain lower than peers with similar economic circumstances, even in states with relatively generous formal policies (Bitler et al., 2021).

The influence of state level *de jure* and *de facto* aspects also matters from the perspective of geographic segregation and clustering of racial and ethnic populations. The far majority of Latino households with low income reside in 20 states; i.e., a subset of states have particular influence in shaping the experiences and benefit rates of Latino households with children. Some evidence suggests that areas with larger Latino populations develop more responsive implementation practices, such as providing materials in Spanish and conducting targeted outreach (Heinrich et al., 2022). However, other research indicates that states with larger racial or ethnic minority populations implement more stringent program requirements that generate additional costs to people for accessing and receiving social assistance benefits (Soss et al., 2017).

De jure and de facto framework and indices

We ground our analysis in two complementary theoretical frameworks. First, classical economic theory suggests that given scarce resources, government programs will be designed to minimize

costs while achieving programmatic aims. This perspective implies that documentation requirements and other "ordeal mechanisms" serve as efficient screening devices to target benefits to those with the highest marginal utility of consumption (Nichols and Zeckhauser, 1982). Under this framework, administrative requirements are not merely friction but serve an allocative purpose. Second, insights from behavioral economics and theories of administrative burden propose that program requirements impose learning, compliance, and psychological costs on potential participants (Bhargava and Manoli, 2015; Moynihan et al., 2016). Unlike the cost minimization framework, this perspective suggests that administrative burdens may not efficiently screen participants but rather create barriers that disproportionately affect certain populations. These burdens can stem from both formal policy design and implementation practices.

De jure state policy design

To codify state *de jure* policy provisions for their basic cash assistance programs, we collect data from multiple public sources. Information on state-specific TANF policies came from the Urban Institute's Welfare Rules Database, [3] which catalogs selected state policy differences for TANF cash aid, including initial eligibility requirements, work and activity requirements, and ongoing eligibility and time limits. These data were supplemented by data on online accessibility of applications, use of combined application processes, and the time required to complete the application for all three programs, as compiled in Code for America's National Safety Net Scorecard. [4] Finally, we also collected information about the availability of program information in Spanish, application and recertification requirements (including, e.g., request for SSN of household members), etc. via direct data collection from State TANF, SNAP, and Medicaid/CHIP websites. To be consistent across all data sources, all of the policy data described above reflect policies and application procedures from 2019. To access website content from 2019, we used the Wayback Machine.[5]

De facto state and local implementation and practices

To codify state and local *de facto* implementation and practices related to their basic cash assistance programs, we surveyed practitioners from the following 11 states: Arizona, California, Colorado, Connecticut, Louisiana, North Carolina, New Mexico, Nevada, Oregon, and a state which requested to stay anonymous (referred to as *anon* from here on). Approximately 45% of the U.S. Latino child population resides in the states represented in this survey sample. Data collection was conducted virtually through Qualtrics during the second half of June 2020, and the survey stayed in the field until May 2021. Respondents were allowed to complete the questionnaire (described below) over several sessions or days. After approximately 2 months from initial contact, states and counties with a low number of responses were sent a reminder to please complete the questionnaire, in an effort to increase the number of submissions. The final survey dataset contains 882 responses, of which 325 come from administrators and 551 from frontline workers. Considering the survey distribution mechanics varied by state, it is difficult to think of response rates and external validity in the traditional sense. Considering characteristics

[3] https://wrd.urban.org/special-reports
[4] https://codeforamerica.org/wp-content/uploads/2021/05/the-national-safety-net-scorecard.pdf
[5] http://web.archive.org/

such as the proportion of the Latino population residing in the states and counties represented in the survey we estimate an overall completion rate of approximately 72 percent.

The questionnaire (available upon request) captures six general themes related to social assistance program practices: organizational processes (language barriers, application processes, requested documentation), training and staff development, economic climate and budgetary constraints, demographics, office space, and external political environment. The questionnaire draws from many other well-established surveys and questionnaires, including work by Gaffney et al. (2018), Hahn et al. (2015), and Heinrich et al. (2022). It also incorporates feedback from other subject matter experts, state representatives, and the Administration for Children and Family staff. [6]

The survey was voluntary and did not ask for any demographic information of the practitioners except county of employment and job title.[7] Additionally, state representatives were allowed to flag individual questionnaire items for removal in their state, if desired. The reasons for this usually involved information or concerns that questions could lead to identifying respondents. Due to different information management practices, state representatives were also allowed to edit the disclaimer at the beginning of the questionnaire. Questions that were not removed at the request of state representatives were asked without modification. Most of the survey questions explicitly focused on practices during 2019, but six contemporaneous questions were included to document how programs adapted their practices in the context of the COVID-19 pandemic.

Coding and construction of indices

Drawing on the data we collected on state basic cash assistance policies and practices, we developed four indices. Appendix Tables present the items included in each index and their coding.

Cost minimization Indices: These indices capture scarce resource allocation in service delivery and accessibility, such as financial costs and limited time available for bureaucrats to do various tasks. We conceptualize the last-mile delivery welfare offices as firms looking to minimize their variable and operational costs. Factors such as increased costs of reviewing paperwork to assess eligibility and decreased costs by having online systems to reduce in-person requirements are central to these indices. To score high on these indices implies that a state reduces costs in its provision of goods and services. Examples of cost minimization would be policies or practices like joint processing with other programs, no requirement to process documents such as SSN, lack of interview requirements; while factors which increase costs would be hiring of cultural

[6] The survey content was also developed in consultations with experts (e.g. Elizabeth Lower-Basch, Peter Germanis, and Heather Hahn) and reviewed by the Steering Committee of the National Center for Research on Hispanic Families and Children.

[7] Approved by Duke IRB 2020-0541. We inquire about job titles and those reflect Directors, state analysts and bureaucrats, regional and county directors, and office managers; and hundreds of frontline workers and supervisors with titles such as Family Coach, Family Assistance Analyst.

consultants and/or translators, targeted outreach efforts, hiring private security or spending on physical security elements such as metal detectors, and offering legal aid (general, immigration, housing, family law, domestic violence or sexual assault, and offering any of these in Spanish).

Administrative Burden Indices: These indices encompass the logistical and bureaucratic barriers faced by individuals when accessing services. They look at the procedural hoops and hurdles – documentation requirements, the waiting times, and other red-tape aspects that can deter individuals from accessing or continuing with a service. To score high on these indices implies that a state's policies or practices place high burden on applicants. Examples of what would count as placing low burden on applicants is availability of online infrastructure to submit forms, no requirements to submit proofs such as immunization, accommodations for non-English speakers and/or disabled applicants, joint processing with other programs. As our work is specifically interested in Latino clients, our indices include availability of materials in Spanish (physical, online, phone), whether there are translators available at the site and outreach efforts specifically targeting Hispanic populations.

Each item is coded as a binary with 1 being high administrative burden or low operational costs, respectively. For the practice indices (practice-based cost minimization and practice-based administrative burden), we take an average across all responses and all surveys in a given state. Unlike the practitioner indices which were based on responses of various bureaucrats in each state and then summarized, the policy indices have one value for each variable which is then averaged into the final policy indices (policy-based cost minimization and policy-based administrative burden).

For each of the four resulting indices (practice-based cost minimization, practice-based administrative burden, policy-based cost minimization, and policy-based administrative burden), we then created z-scores for each state, such that scores of 0 represent the average administrative burden across all states with available data (all states for the policy indices; the 11 focal states for the practice indices). Positive scores represent administrative burdens or cost minimization that are higher than average (e.g., a score of 1 would be one standard deviation above the mean), while negative scores represent administrative burdens or cost minimization that are lower than average (e.g., a score of -1 would be one standard deviation below the mean).

Some items are included in only one index. For example, the amount of time required to complete an application and the availability of application materials in Spanish are only in the administrative burden indices as they reduce costs on the applicants but do not contribute to ongoing operational costs. Conversely, eligibility policies such as those extending eligibility to special categories of legal permanent residents (e.g., asylees/refugees, battered individuals) are only included in the cost minimization index since it is costly for the welfare offices to check paperwork but doesn't change the costs of applying for applicants. Other items are relevant to both the cost minimization index and the administrative burden index; however, they may be coded differently. For example, hiring cultural consultants, which enables front-line staff to work more effectively with Hispanic applicants, reduces burden on applicants navigating the bureaucratic process; but it also makes the process more expensive to welfare offices due to costs of hiring additional workers who also then need to be supervised by bureaucrats. In other cases, however, features of policy or practice can both minimize operational costs and reduce burden on families. For example, availability of an online infrastructure of application requirements and

filling forms digitally can reduce burden on applicants, while also reducing costs to the welfare offices.

In sum, the indices we developed are intended to capture four conceptually distinct ways in which state TANF policies and practices may vary and shape program participation. (1) The *cash assistance policy administrative burden index* ("policy administrative burden index") reflects potential administrative burdens posed by state cash assistance policies related to application processes and documentation and compliance requirements and was normed across all states and the District of Columbia. (2) The *cash assistance practice administrative burden index* ("practice administrative burden index") reflects potential administrative burden posed by cash assistance on-the-ground practices as conveyed by administrators and front-line workers, such as outreach, agency staff hiring, and staff training practices, and was normed across the 11 states that participated in a survey. (3) The *cash assistance policy cost minimization index* ("policy cost minimization index") reflects potential cost minimization efforts posed by state cash assistance policies related to eligibility criteria, application processes and documentation and compliance requirements and was normed across all states and the District of Columbia. (4) The *cash assistance practice cost minimization index* ("practice cost minimization index") reflects potential cost minimization activities posed by cash assistance on-the-ground practices as conveyed by administrators and front-line workers, such as outreach, agency staff hiring, and staff training practices, and was normed across the 11 states that participated in a survey.

DATA AND DESCRIPTIVE STATISTICS

We rely on the Annual Social and Economic Supplement of the Current Population Survey pooling data from 2016 to 2019 to generate benefit receipt rates of basic cash assistance receipt through the Temporary Assistance for Needy Families (TANF) program among households with at least one child under the age of 18 and who live in one of the 11 focal states in our study (Arizona, California, Colorado, Connecticut, Louisiana, Nevada, New Mexico, North Carolina, Oregon, Pennsylvania, and one anonymous state). We drop respondents in group quarters and household members who are not related to the head of household. In addition, we trim the top 5% of the income distribution (based on income used by CPS to compute poverty statistics) as well as households under 20% of the federal poverty level (FPL). Households with Latino children or children who have either parent coded as Latino are considered Latino households in our analyses. Data are aggregated to the state level unit of analysis. National (and state-level) indicators were computed using CPS-provided household weights, while cross-state statistics weight each entity equally.

Table 1 presents descriptive statistics for TANF cash assistance receipt rates, the proportion of households with incomes below 250% and 130% of the FPL respectively, and the proportion of households that are Latino. Descriptive statistics are presented at the household and state level (for the 11 focal states in our study), overall and by Latino ethnicity. Findings show that rates of cash assistance receipt, at 3.5 percent, are approximately 70 percent higher among Latino households than non-Latino households (at 2.0 percent). This finding is unsurprising in light of higher rates of poverty among Latino households, over 90 percent higher than non-Latino households at 130% of the FPL. Figure 1 shows the non-linear relationship between cash

assistance receipt and income-to-needs among households in the 11 states. Panel B also shows higher receipt rates among states with higher Latino populations.[8]

Figures 2-3 present the distribution of the policy design cost minimization and administrative burden index scores for all 50 states and then the 11 states that are the focus of this study. In Figure 2, we see that cost minimization captured by the cash assistance *de jure* policy design index varies substantially, ranging from more than one and a half standard deviation below the average in New York to 3.0 standard deviations above the average in Mississippi. In Figure 3, states' scores on the *de jure* policy design administrative burden index range from 1.5 standard deviations below the national norm for Ohio, to 2.5 standard deviations above the norm for West Virginia. Descriptively, the policy administrative burden index scores tend to be higher among the states with the largest Latino populations. Important here is that variation in either index for the 11 states does not appear to systematically differ from variation across the 50 states, thus minimizing concern about selection bias of information on *de facto* practices from the 11 states that participated in the survey and thus represent the sample for this study.

Figure 4 overlays the indices capturing *de jure* policies with *de facto* practices for the 11 focal states. Some states with low scores on the *de jure* policy cost minimization index tend to also have low scores on the *de facto* practice cost minimization index, as represented by the dots in the lower left and upper right quadrants. However, almost as many of the 11 states are discordant in their policy and practice cost minimization and administrative burden index scores. That is, some states have higher cost minimization or administrative burden scores based on their *de jure* policies, but lower cost minimization or administrative burden scores in *de facto* practice. Thus, there is heterogeneity across states in how much *de facto* practice varies from *de jure* policy.

METHOD

To examine the relationship between the policy and practice indices and receipt of cash assistance, we estimate the following model using CPS microdata (as described earlier) restricted to households at or under 250% of the FPL.

$$y_{is} = \alpha_1 f(x_{is}) + \beta_1 CMD_s + \beta_2 ABD_s + \pi_1 CMP_s + \pi_2 ABP_s + \gamma D_{is} + \delta P_s + \varepsilon_{is}$$

Where the dependent variable is the benefit receipt indicator for a given program by household "i" in state "s", $f(x_{is})$ stands for a polynomial function of income-to-needs ratio for that same household, and D and P measure additional covariates for households and states. Importantly, CMD, ABD, CMP and ABP are the covariates of interest in our model, representing the cost minimization and the administrative burden indices we discussed above (z-scored) in the design and practice dimensions, respectively. Since we expect these to affect Latino and non-Latino households in different ways, in a second set of models, we also include the interaction of the

[8] In companion work, Gennetian et al. (2025) provide estimates of Table 1 with the nationally representative sample and all 50 states plus Washington DC. We show in that paper that the descriptive findings are similar when using TRIM3 to produce estimates. For this study, we will rely only on the CPS reported estimates of benefit receipt particularly given the smaller sample of states that do not equal representation in TRIM3 given that TRIM3's algorithm is calibrated to match state-level aggregate levels of receipt, and it is unclear how reliable TRIM3's estimates are when examining subpopulations defined by income and Latino ethnicity.

latter with all variables in the model, emphasizing the interpretation of the interaction with these policy indices.

The models are estimated so that each household is weighted within state but that all states are weighted identically in the overall regression. Throughout we cluster our standard errors at the level of the state (the same level from which the policy variation is coming from).

RESULTS

Table 2 shows results across 7 models. Latino households have slightly higher rates of cash assistance receipt (model 1). After accounting for household income-to-needs ratios (model 2), the direction of the coefficient shifts, indicating lower (though still non-significant) cash assistance receipts among Latino households. Once controlling for child and household demographics and for state-level poverty and other characteristics (model 4) and for policy design and practices (models 5-7), Latino households are less likely to receive cash assistance (at approximately 40 percent relative to the mean value for non-Latino households, -1.35/3.2).

Findings from Table 2 also show that *de jure* policies capturing administrative burden are not associated with lower rates of receipt, but *de jure* policies that minimize operational costs are associated with lower rates of receipt. The additional role of *de facto* practices are shown in Model 6. Both cost minimization and administrative burden *de facto* practices are each independently associated with lower cash assistance receipt rates. Model 7 considers *de jure* policy and *de facto*r practice. *De facto* practices capturing cost minimization remain statistically significant, associated with lower receipt; and, as shown at the bottom panel, *de facto* practices jointly predict cash assistance receipt rates differentially from *de jure* policy.

Table 3 presents findings stratified by Latino ethnicity. De jure policy and *de facto* practices that minimize costs are independently associated with lower rates of cash assistance receipt among Latino households; whereas none of the indices are associated with rates of receipt among non-Latino households. These results are further examined in models 4 and 5, testing the association between each policy and practice index and cash assistance receipt interacted by Latino ethnicity. Model 5 includes a state fixed effect to further control for unobserved differences between states that might be correlated with both variation in the indices and variation in rates of cash assistance receipt. Findings are qualitatively similar to Model 4. After accounting for unobserved differences between states, Latino households are relatively less negatively impacted by *de facto* practices that increase administrative burden compared to non-Latino households.

Discussion

This study takes a novel look at *de jure* policy design and *de facto* implementation aspects of state level cash assistance policies. State-level rates of cash assistance receipt vary considerably across the United States. This variation cannot be fully attributed to state variation in rates of poverty (whereas variation in poverty explains more of the variation in other types of means-tested government programs, such as SNAP and Medicaid, see Gennetian et al., 2025). The role of other aspects of households and state characteristics, beyond poverty, and cash assistance receipt is particularly pronounced among Latino households with children. This is particularly striking given high rates of Latino poverty. We examine *de jure* policy and *de facto* practice with

new data collected on state policies curated from publicly available sources and on practices by state administrators and frontline workers via a survey of practitioners from 11 states with large Latino populations. Indices are coded conceptually following a cost minimization and administrative burden framework. We examine how cash assistance policy and practice cost minimization and administrative burden correspond to rates of receipt for Latino families compared to non-Latino families, controlling for a range of observed household and state characteristics, including household income-to-needs, state poverty rates, and the size of the Latino population in the state – as well as unobserved states characteristics (through state fixed effects models).

Communities with a high proportion of Latino families may be able to draw on enhanced social capital and more developed, culturally specific resources that facilitate access to support services; community awareness of how to navigate U.S. safety net systems; and more formal on-the-ground practices in field offices intended to serve the needs of the specific community (Bohon et al., 2005). On the other hand, communities with higher shares of Latino and Black people are also found to be more likely to face more stringent or exclusionary policies that limit access to social assistance (Parolin, 2021).

After accounting for household income-to-needs ratios and other household and state characteristics, Latino households show significantly lower rates of cash assistance receipt compared to non-Latino households with similar economic circumstances. Considering *de jure* policy alone approaches that minimize operational costs (such as restrictive eligibility criteria) were associated with lower program uptake, while policies that increase administrative burden showed no relationship with receipt. However, *de facto* practices, irrespective of cost minimization or administrative burden were associated with reduced cash assistance receipt.

When considering both *de jure* policy and *de facto* practice simultaneously, cost-minimization *de facto* practices emerged as having the strongest independent relationship with cash assistance receipt. These practices include field office budgetary decisions that result in not providing legal aid services, forgoing security features like metal detectors or bullet-proof glass, limiting communication with other programs about how to tailor outreach to Latino families, and maintaining lower staff retention rates. Such operational choices may reflect broader institutional approaches to managing program resources.

Effects were most pronounced among Latino households with children with very low income. Somewhat counterintuitively, compared to non-Latino peers, Latino households with children were less negatively impacted by *de facto* practices that increase administrative burden, a finding that holds after accounting for unobserved state-level differences. Examples of practices that increase administrative burden include limited availability of program information in Spanish or interpreters, fewer Hispanic or Spanish-speaking frontline staff, limited or no relationships with community advocates, and lower scores on intercultural effectiveness measures. The state-fixed effect may be capturing the presence of these features of high administrative burden strongly correlated with unobserved state-level factors such as other state policies that are less friendly towards immigrants and create a chilling effect that depresses receipt of government program benefits among Latino households (Capps et al., 2020).

The findings raise new evidence about the trade-offs between program efficiency and accessibility for policymakers, and how policy is designed versus implemented. Some strategies, such as automated eligibility verification and integrated data systems, can achieve both aims

(Finkelstein and Notowidigdo, 2019). However, other approaches reveal competing priorities. Reducing wait times and providing comprehensive language services require additional staffing resources, while enhanced documentation requirements may reduce error rates and increase compliance but create barriers for eligible families who might benefit the most.

References

Acemoglu, Daron, and James A. Robinson. "De facto political power and institutional persistence." *American Economic Review* 96, no. 2 (2006): 325-330.

Aizer, Anna, Hilary Hoynes, and Adriana Lleras-Muney. "Children and the US social safety net: Balancing disincentives for adults and benefits for children." *Journal of Economic Perspectives* 36, no. 2 (2022): 149-174.

Alsan, Marcella, and Crystal S. Yang. "Fear and the safety net: Evidence from secure communities." *Review of Economics and Statistics* 106, no. 6 (2024): 1427-1441.

Alvira-Hammond, Marta, and Lisa A. Gennetian. "How Hispanic parents perceive their need and eligibility for public assistance." *Bethesda, MD: National Research Center on Hispanic Children and Families* (2015).

Amerikaner, Layne, Clayton Buck, Robyn Moore, Jennifer Martinez, and Collin Mueller. "Administrative burdens as a family affair: Navigating racialized safety-net systems post-welfare reform." *Journal of Marriage and Family* (2025).

Bansak, Cynthia, and Steven Raphael. "Have employment relationships in the United States become less stable?." *International Advances in Economic Research* 12 (2006): 342-357.

Barnes, Carolyn, Jamila Michener, and Emily Rains. "“It’s like night and day”: How bureaucratic encounters vary across WIC, SNAP, and Medicaid." *Social Service Review* 97, no. 1 (2023): 3-42.

Barnes, Carolyn Y., and Lisa A. Gennetian. "Experiences of Hispanic families with social services in the racially segregated southeast: Views from administrators and workers in North Carolina." *Race and Social Problems* 13, no. 1 (2021): 6-21.

Bhargava, Saurabh, and Dayanand Manoli. "Psychological frictions and the incomplete take-up of social benefits: Evidence from an IRS field experiment." *American Economic Review* 105, no. 11 (2015): 3489-3529.

Bitler, Marianne, Lisa A. Gennetian, Christina Gibson-Davis, and Marcos A. Rangel. "Means-tested safety net programs and Hispanic families: Evidence from Medicaid, SNAP, and WIC." *The ANNALS of the American Academy of Political and Social Science* 696, no. 1 (2021): 274-305.

Bohon, Stephanie A., Heather Macpherson, and Jorge H. Atiles. "Educational barriers for new Latinos in Georgia." *Journal of Latinos and Education* 4, no. 1 (2005): 43-58.

Capps, Randy, Michael Fix, and Jeanne Batalova. "Anticipated ‘Chilling Effects’ of the Public-Charge Rule Are Real: Census Data Reflect Steep Decline in Benefits Use by Immigrant Families." *Migration Policy Institute* (2020).

Chen, Jiawen, and Kristin Langwasser. "COVID-19 Stimulus Payments and the Reserve Bank's Transactional Banking Services| Bulletin–June 2021." (2021).

Clarke, Wyatt, Kimberly Turner, and Lina Guzman. "One quarter of Hispanic children in the United States have an unauthorized immigrant parent." *National Research Center on Hispanic Children and Families* 28 (2017).

Code for America. (2021). *The national safety net scorecard*. https://codeforamerica.org/wp-content/uploads/2021/05/the-national-safety-net-scorecard.pdf

East, Chloe N. "The effect of food stamps on children's health: Evidence from immigrants' changing eligibility." *Journal of Human Resources* 55, no. 2 (2020): 387-427.

Ezzat, Asmaa, and Chahir Zaki. "On the political economy of trade agreements: A *de jure* and *de facto* analysis of institutions." *International Economics* 172 (2022): 143-156.

Falk, Gene, Alison Mitchell, Karen E. Lynch, Maggie McCarty, William R. Morton, and Margot L. Crandall-Hollick. *Need-tested benefits: Estimated eligibility and benefit receipt by families and individuals (CRS Report No. R44327)*. 2015.

Finkelstein, Amy, and Matthew J. Notowidigdo. "Take-up and targeting: Experimental evidence from SNAP." *The Quarterly Journal of Economics* 134, no. 3 (2019): 1505-1556.

Fix, Michael, and Wendy Zimmermann. "All under one roof: Mixed-status families in an era of reform 1." *International Migration Review* 35, no. 2 (2001): 397-419.

Gaffney, A., A. Glosser, and C. Agoncillo. "Organizational culture in TANF offices: A review of the literature (OPRE Report 2018–116). Washington, DC: US Department of Health and Human Services, Administration for Children and Families, Office of Planning." *Research and Evaluation* (2018).

Ganong, Peter, and Jeffrey B. Liebman. "The decline, rebound, and further rise in SNAP enrollment: Disentangling business cycle fluctuations and policy changes." *American Economic Journal: Economic Policy* 10, no. 4 (2018): 153-176.

Giannella, Eric, Tatiana Homonoff, Gwen Rino, and Jason Somerville. "Administrative burden and procedural denials: experimental evidence from SNAP." *American Economic Journal: Economic Policy* 16, no. 4 (2024): 316-340.

Gennetian, Lisa A., Marcos Rangel, Dana Thomson, Luis Basurto, Prachi Shukla, and Haocheng Yong. "Heterogeneous receipt of social assistance programs among families with low income in the U.S.: The role of state policy design." (2025)

Gennetian, Lisa A., Zoelene Hill, and Dakota Ross-Cabrera. "State-level TANF policies and practice may shape access and utilization among Hispanic families." *Hispanic Research Center* (2020).

Ginther, Donna K., and Michelle Johnson-Motoyama. "Associations Between State TANF Policies, Child Protective Services Involvement, And Foster Care Placement: Study examines associations between state-level Temporary Assistance for Needy Families policies, child protective services involvement, and foster care placement." *Health Affairs* 41, no. 12 (2022): 1744-1753.

Hahn, Heather, David Kassabian, Lina Breslav, and Yvette Lamb. "A descriptive study of county-versus state administered Temporary Assistance for Needy Families programs." *Washington, DC: Urban Institute* (2015).

Haley, Jennifer M., Genevieve M. Kenney, Hamutal Bernstein, and Dulce Gonzalez. "One in five adults in immigrant families with children reported chilling effects on public benefit receipt in 2019."

Washington, DC: Urban Institute 1 (2020): 1-21.

Heinrich, Carolyn J., Sayil Camacho, Sarah Clark Henderson, Mónica Hernández, and Ela Joshi. "Consequences of administrative burden for social safety nets that support the healthy development of children." *Journal of Policy Analysis and Management* 41, no. 1 (2022): 11-44.

Hoynes, Hilary W., and Diane Whitmore Schanzenbach. *Safety net investments in children*. No. w24594. National Bureau of Economic Research, 2018.

Ko, Wonsik, and Robert A. Moffitt. "Take-up of social benefits." *Handbook of Labor, Human Resources and Population Economics* (2024): 1-42.

Kopczuk, Wojciech, and Cristian Pop-Eleches. "Electronic filing, tax preparers and participation in the Earned Income Tax Credit." *Journal of Public Economics* 91, no. 7-8 (2007): 1351-1367.

Lasky-Fink, Jessica, and Elizabeth Linos. "Improving delivery of the social safety net: The role of stigma." *Journal of Public Administration Research and Theory* 34, no. 2 (2024): 270-283.

Linos, Elizabeth, Allen Prohofsky, Aparna Ramesh, Jesse Rothstein, and Matthew Unrath. "Can nudges increase take-up of the EITC? Evidence from multiple field experiments." *American Economic Journal: Economic Policy* 14, no. 4 (2022): 432-452.

Landale, Nancy S., Kevin JA Thomas, and Jennifer Van Hook. "The living arrangements of children of immigrants." *The future of children/Center for the Future of Children, the David and Lucile Packard Foundation* 21, no. 1 (2011): 43.

Macartney, Suzanne, and Robin Ghertner. "Participation in the US social safety net: Coverage of low-income families, 2018." *ASPE Research Brief. Washington, DC: Office of the Assistant Secretary for Planning and Evaluation, US Department of Health and Human Services* (2021).

Meyer, Bruce D., and Nikolas Mittag. "Using linked survey and administrative data to better measure income: Implications for poverty, program effectiveness, and holes in the safety net." *American Economic Journal: Applied Economics* 11, no. 2 (2019): 176-204.

Minton, Sarah, and Linda Giannarelli. "Five things you may not know about the US social safety net." *Washington, DC: Urban Institute* (2019).

Moffitt, Robert A. and Peter T. Gottschalk. “Ethnic and Racial Differences in Welfare Receipt in the United States.” In National Academies of Sciences, Engineering, and Medicine, *America Becoming: Racial Trends and Their Consequences: Volume II*. Washington, DC: The National Academies Press, 2001.

Moynihan, Donald P., Pamela Herd, and Elizabeth Ribgy. "Policymaking by other means: Do states use administrative barriers to limit access to Medicaid?." *Administration and Society* 48, no. 4 (2016): 497–524.

National Academy of Sciences, Engineering and Medicine (2024). Reducing Intergenerational Poverty. Washington, DC: National Academies Press.

National Academy of Sciences, Engineering and Medicine (2019). A Roadmap to Reducing Child Poverty. Washington, DC: National Academies Press.

Nichols, Albert L., and Richard J. Zeckhauser. "Targeting transfers through restrictions on recipients." *The American Economic Review* 72, no. 2 (1982): 372-377.

Nichols, Austin, and Margaret Simms. "Racial and ethnic differences in receipt of unemployment insurance benefits during the great recession." *Unemployment and Recovery Project Brief* 4 (2012).

Page, Marianne E. "New Advances on an Old Question: Does Money Matter for Children's Outcomes?." *Journal of Economic Literature* 62, no. 3 (2024): 891-947.

Parolin, Zachary. "Temporary Assistance for Needy Families and the Black-White Child Poverty Gap in the United States." *Socio-Economic Review* 19, no. 3 (2021): 1005-1035.

Shrider, Emily A. "Poverty in the United States: 2023." U.S. Census Bureau, Current Population Reports, P60-283 (2024).

Soss, Joe, and Vesla Weaver. "Police are our government: Politics, political science, and the policing of race–class subjugated communities." *Annual Review of Political Science* 20, no. 1 (2017): 565-591.

Thomson, Dana, Yiyu Chen, Lisa A. Gennetian, and Luis E. Basurto. "Earned Income Tax Credit Receipt By Hispanic Families With Children: State Outreach And Demographic Factors: Study examines state outreach efforts and demographic factors in Earned Income Tax Credit receipt by Hispanic families with children." *Health Affairs* 41, no. 12 (2022): 1725-1734.

Urban Institute. *What Works to Promote Children's Learning.* https://wrd.urban.org/.

Table 1: Cash assistance and poverty rates, descriptive statistics, overall and by Latino ethnicity

	All households		Non-Latino households		Latino households	
	mean [1.1]	sd [1.2]	mean [2.1]	sd [2.2]	mean [3.1]	sd [3.2]
Panel A: Household-level statistics (population weighted)						
TANF (% receiving)	2.51	15.66	2.01	14.03	3.47	18.31
TANF TRIM3 (% receiving)	5.21	22.22	3.31	17.88	8.83	28.37
% Under 250% of FPL	43.88	49.62	35.49	47.85	59.80	49.03
% Under 130% of FPL	19.71	39.78	14.94	35.65	28.77	45.27
% Latino	34.49	47.53	0.00	-	100.00	-
Observations	26,590		16,528		10,062	
Panel B: State-level aggregate statistics						
TANF (% HHs receiving)	2.03	1.00	1.87	0.81	2.23	1.43
TANF TRIM3 (% HHs receiving)	3.44	2.39	2.40	1.74	5.70	3.56
% HHs under 250% of FPL	44.56	6.34	36.97	7.49	61.33	4.00
% HHs under 130% of FPL	19.90	4.18	15.68	5.02	29.29	4.02
% Latino HHs	31.54	17.17	-	-	-	-
Observations	11		11		11	

Notes: Computations are based on CPS 2016-2019 pooled IPUMS sample of households with under-18 children. To estimate these indicators both group-quarters and households in the top 5% of household total-income distribution and those with income under 20% of FPL were excluded. There are 11 states in the microdata. National (and state-level) indicators computed using CPS-provided household weights, while cross-state statistics weight each entity equally.

Table 2: Cash assistance receipt, ethnicity, *de jure* policy design and *de facto* practice

	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Latino	0.145	−0.406	−0.515	−1.405***	−1.370***	−1.369***	−1.355***
	(0.436)	(0.514)	(0.536)	(0.221)	(0.224)	(0.218)	(0.221)
Policy Design index (AB)					0.078		−0.290
					(0.128)		(0.243)
Policy Design index (CM)					−0.824**		−0.292
					(0.281)		(0.314)
Policy Practice index (AB)						−0.957**	−0.689
						(0.394)	(0.404)
Policy Practice index (CM)						−0.465*	−0.574*
						(0.225)	(0.281)
Controls							
HH Income-to-needs		YES	YES	YES	YES	YES	YES
Child and HH demog.			YES	YES	YES	YES	YES
State-level poverty and demog.				YES	YES	YES	YES
F-test Design					0.026		0.213
F-test Practice						0.014	0.087
F-test Design-Practice							0.010
Observations	32305	32305	32305	32305	32305	32305	32305
Mean receipt (Non-Latino)	3.164	3.164	3.164	3.164	3.164	3.164	3.164

Notes: Computations are based on CPS 2016-2019 pooled IPUMS sample of households with under-18 children and under 350% of FPL residing in 11 selected U.S. states. Standard-errors in parentheses are clustered at the state level. p-values presented for F-test reporting.

Table 3: Cash assistance receipt, *de jure* policy design and *de facto* practice, by Latino ethnicity

	All Households (1)	Latino Households (2)	Non-Latino Households (3)	All Households (4)	All Households (5)
Latino	-1.355^{***}				
	(0.221)				
Policy Design index (AB)	-0.290	-0.066	-0.282	-0.282	
	(0.243)	(0.290)	(0.213)	(0.213)	
Policy Design index (CM)	-0.292	-0.720^{**}	-0.186	-0.186	
	(0.314)	(0.287)	(0.305)	(0.305)	
Policy Practice index (AB)	-0.689	-0.661	-0.544	-0.544	
	(0.404)	(0.392)	(0.352)	(0.352)	
Policy Practice index (CM)	-0.574^{*}	-0.766^{***}	-0.387	-0.387	
	(0.281)	(0.223)	(0.299)	(0.299)	
Latino $\times$ Design index (AB)				0.216	0.108
				(0.167)	(0.113)
Latino $\times$ Design index (CM)				-0.534^{***}	-0.743^{***}
				(0.167)	(0.082)
Latino $\times$ Practice index (AB)				-0.117	0.392^{***}
				(0.135)	(0.075)
Latino $\times$ Practice index (CM)				-0.378^{**}	-0.206^{**}
				(0.135)	(0.085)
Controls					
HH Income-to-needs	YES	YES	YES	YES	YES
Child and HH demog.	YES	YES	YES	YES	YES
State-level poverty and demog.		YES	YES	YES	YES
State Fixed-Effects					YES
F-test Design	0.213	0.070	0.190	0.190	
F-test Practice	0.087	0.006	0.210	0.210	
*F-test Latino*Design*				0.024	0.000
*F-test Latino*Practice*				0.007	0.000
Observations	32305	15841	16464	32305	32305

Notes: Computations are based on CPS 2016-2019 pooled IPUMS sample of households with under-18 children and under 350% of FPL residing in 11 selected U.S. states. Standard-errors in parentheses are clustered at the state level. p-values presented for F-test reporting.

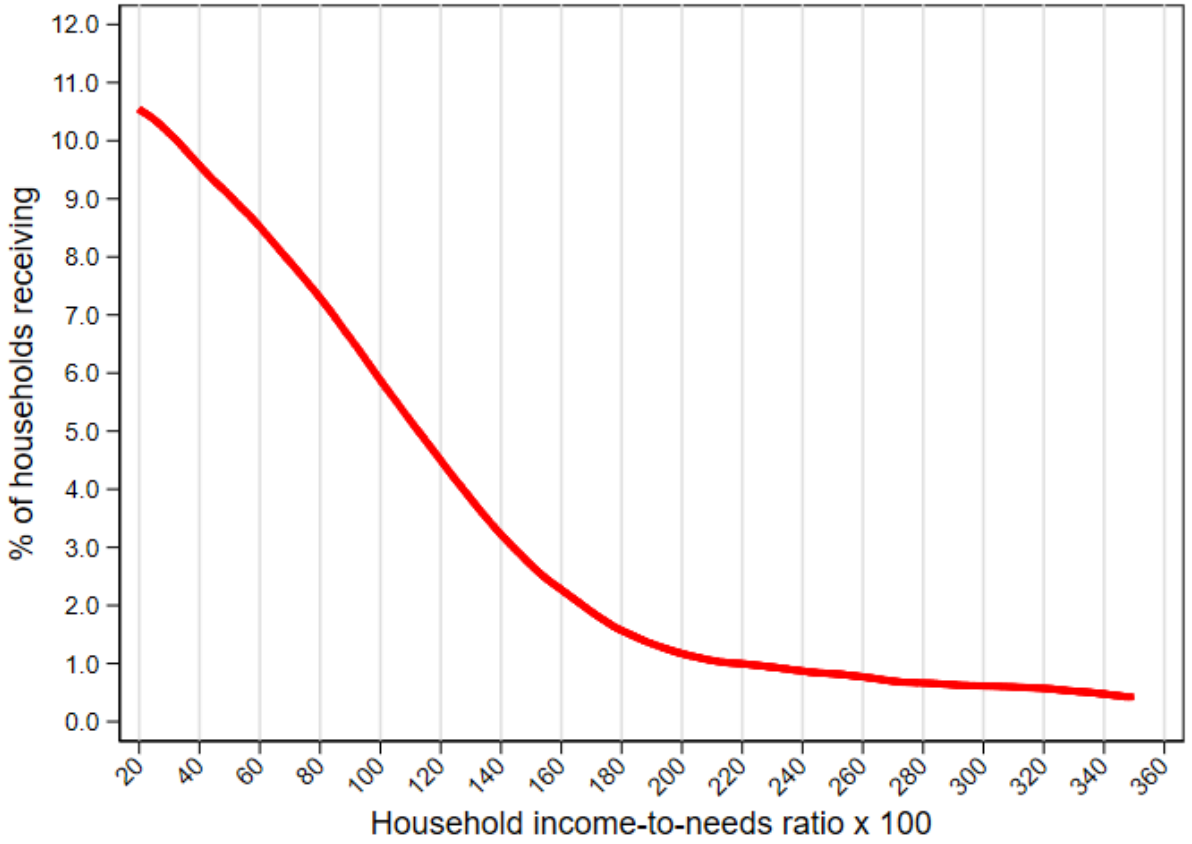


Figure 1: Smoothed Relation between Household Cash Assistance Receipt and Income to Needs Ratio

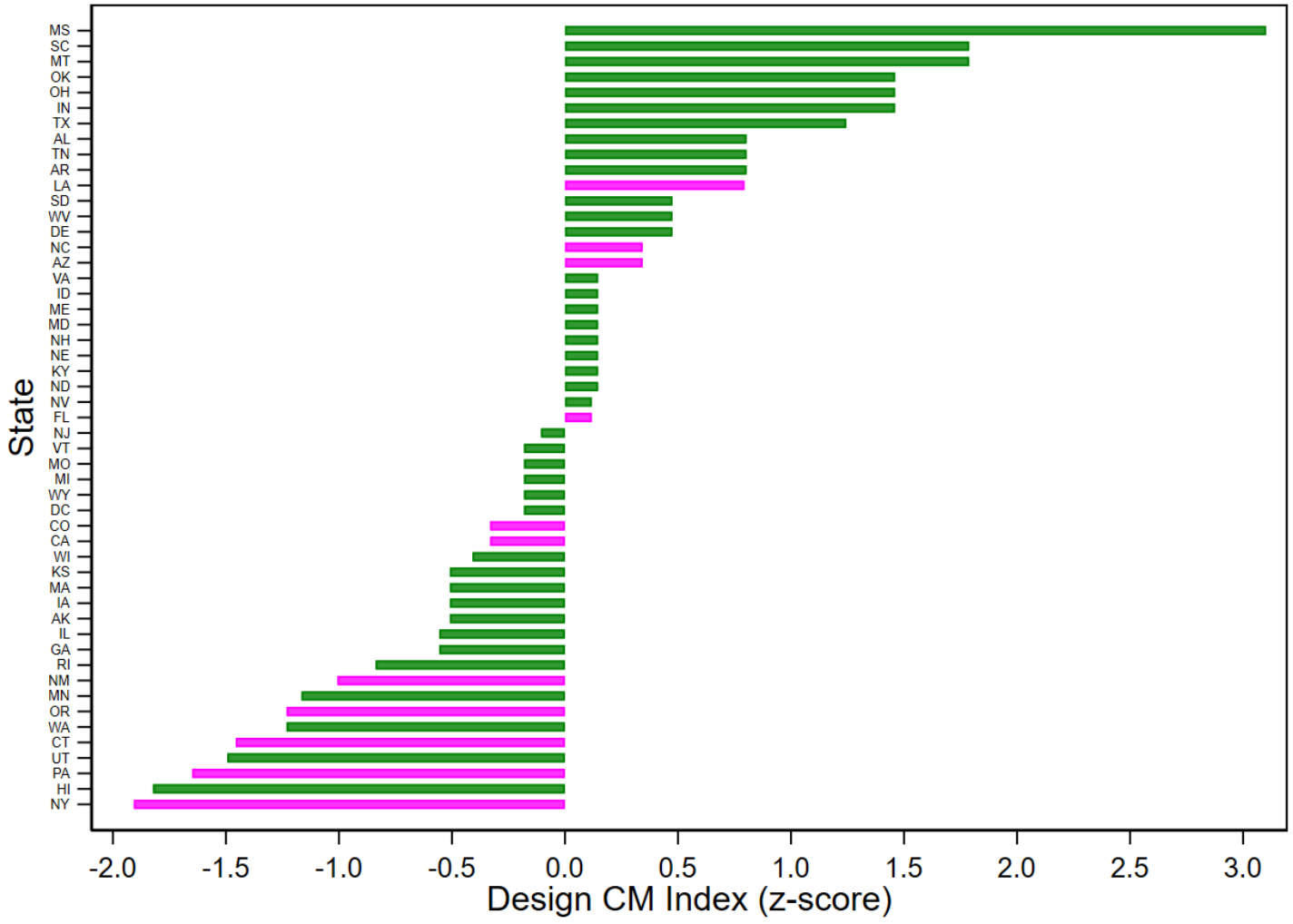


Figure 2: *de jure* Policy Design - Cost Minimization Index in 50 States (highlighted are 11 surveyed)

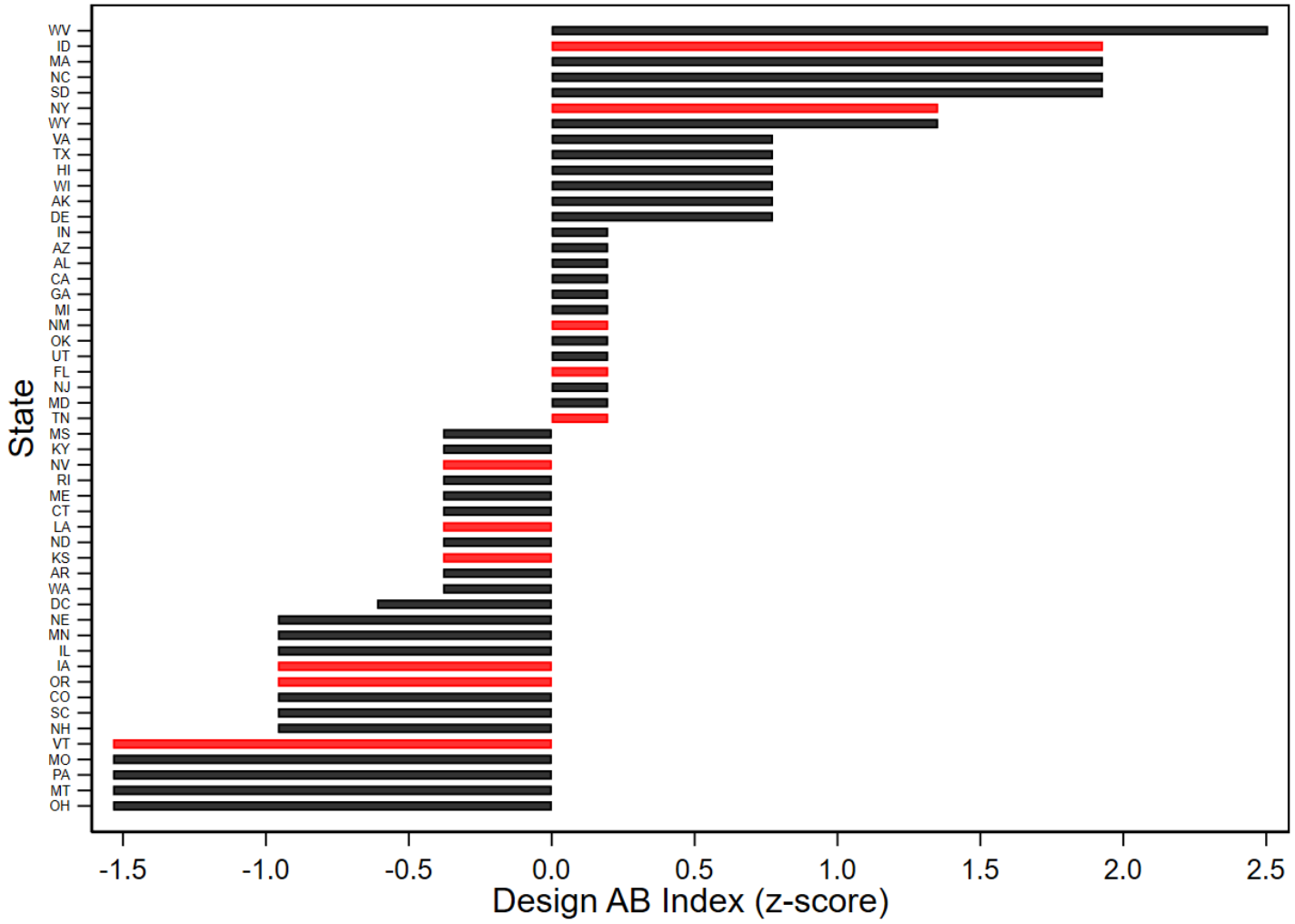


Figure 3: *de jure* - Administrative Burden Index in 50 States (highlighted are 11 surveyed)

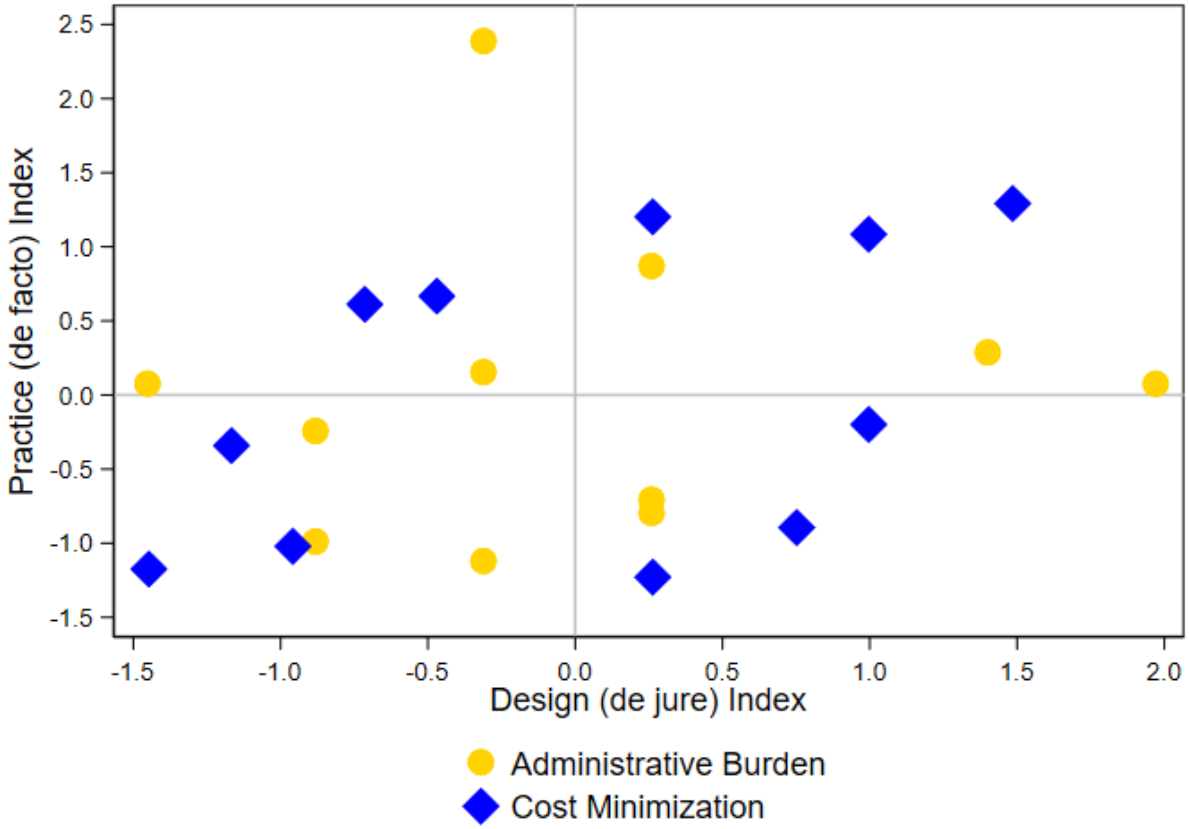


Figure 4: Relationship between *de jure* policy design and *de facto* practice indices, 11 states

Appendix Table 1. De jure policy and de facto practice indices: item-level coding

Variable	Administrative Burden Index Coding	Cost Minimization Index Coding
Policy Data		
Spanish Availability: Program Information (Online)	1 = "Not available or available only through Google Translate/External Resource (phone number or translation resource)"; 0 = "Available in Spanish"	n/a
Spanish Availability: Application Form (Online)	1 = "Not available"; 0 = "Available"	n/a
Availability: Application Form (Online)	1 = "Not available or available only through Google Translate/External Resource (phone number or translation resource)"; 0 = "Available in Spanish"	n/a
Outreach / Marketing Materials (Online)	1 = "Not available or available only through Google Translate/External Resource (phone number or translation resource)"; 0 = "Available in Spanish"	1 = "Not available or available only through Google Translate/External Resource (phone number or translation resource)"; 0 = "Available in Spanish"
Applicant Social Security Number Requirement	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Assistance Unit Social Security Number Requirement	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Household Member Information Requirement	1 = "Yes"; 0 = "No"	n/a
State Recertification Requirement	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Recertification Frequency	1 = "Required every 6 or 9 months"; 0 = "Required only every 12+ months"	1 = "Required only every 12+ months"; 0 = "Required every 6 or 9 months"
Income Verification Requirement	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Supporting Documentation Requirement	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Government Agency Information Sharing	1 = "Application indicates information will be shared"; 0 = "No"	1 = "Application does not indicate information will be shared"; 0 = "Application indicates information will be shared"
Immigration Agency Information Sharing	1 = "Application indicates information will be shared"; 0 = "No"	1 = "Application does not indicate information will be shared"; 0 = "Application indicates information will be shared"
Interview Requirement	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Online Application Option	1 = "No"; 0 = "Yes"	1 = "Yes"; 0 = "No"
Multi-Program Application Form	1 = "No"; 0 = "Yes"	1 = "Yes"; 0 = "No"
Application Completion Time (Minutes)	1 = "Above median"; 0 = "Below median"	n/a
Specific Needs Accommodations (e.g., phone help, interpreters, modifications)	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
Eligibility: Non-Exempt Lawful Permanent Residents	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: Non-Exempt Asylees	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: Post-PRWORA Lawful Permanent Residents Within 5-Year Time Limit	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: Post-PRWORA Asylees/Refugees Within 5-Year Time Limit	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: Post-PRWORA Deportees Within 5-Year Time Limit	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: Post-PRWORA Parolees Within 5-Year Time Limit	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: Post-PRWORA Battered Within 5-Year Time Limit	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: State Aid for Lawful Permanent Residents Within 5-Year Time Limit	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: State Aid for Parolees Within 5-Year Time Limit	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: State Aid for Battered Within 5-Year Time Limit	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: State Aid for Nonqualified Post-PRWORA	n/a	1 = "None or some eligible"; 0 = "All"
Eligibility: Inclusion of Nonparent Caretakers	n/a	1 = "Prohibited or optional only for some"; 0 = "Optional for all"
Eligibility: Non-caretaker Adults	n/a	1 = "None or only partners counted"; 0 = "Relatives counted"
Eligibility: Non-caretaker Adult Income	n/a	1 = "Not counted"; 0 = "Counted"
Eligibility: Children Living with Nonrelative Caretaker Eligible	n/a	1 = "No"; 0 = "Yes"
Eligibility: Grandparent Income Counted Against Unit for Eligibility & Benefit Computation	n/a	1 = "No"; 0 = "Yes"
Eligibility: Excluded Parent Income due to Immigration Status	n/a	1 = "No"; 0 = "Yes"
School Requirement	1 = "Yes"; 0 = "No"	1 = "Yes"; 0 = "No"
Immunization Compliance Requirement	1 = "Yes"; 0 = "No"	1 = "Yes"; 0 = "No"
Health Screening Compliance Requirement	1 = "Yes"; 0 = "No"	1 = "Yes"; 0 = "No"
External Work Requirement for Parents	1 = "Optional or required"; 0 = "Not required"	1 = "Optional or required"; 0 = "Not required"
Benefit Issuance Method	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
Practice Data		
Spanish Application Accessibility: In-person	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Spanish Application Accessibility: Online	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Spanish Application Accessibility: Phone (toll)	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a

Spanish Application Accessibility: Phone (toll-free)	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Spanish Application Accessibility: Smartphone App	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Spanish Interview Accessibility	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Spanish Case Management Accessibility	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Spanish Interpreter Accessibility: Full-time, on-site	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Spanish Interpreter Accessibility: On-demand, on-site	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Spanish Interpreter Accessibility: On-demand, remote	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Other Language Overall Interpreter Accessibility	1 = "Barely accessible or worse"; 0 = "Fairly accessible or better"	n/a
Use of Cultural Consultants	1 = "Seldom or less"; 0 = "Sometimes or more"	1 = "Seldom or less", 0 = "Sometimes or more"
Application Accessibility for Non-English-Speaking Families	1 = "Neither easy nor difficult or worse"; 0 = "Somewhat easy or better"	n/a
Spanish Materials Availability Increase Over Last 5 Years	1 = "To a small extent or less"; 0 = "To a moderate extent or more"	n/a
Targeted Hispanic Outreach Efforts: Social Media	1 = "Barely or less"; 0 = "Fairly or more"	1 = "Barely or less"; 0 = "Fairly or more"
Targeted Hispanic Outreach Efforts: Physical Publishing	1 = "Barely or less"; 0 = "Fairly or more"	1 = "Barely or less"; 0 = "Fairly or more"
Targeted Hispanic Outreach Efforts: Media Broadcast	1 = "Barely or less"; 0 = "Fairly or more"	1 = "Barely or less"; 0 = "Fairly or more"
Targeted Hispanic Outreach Efforts: Business or Cultural Partnerships	1 = "Barely or less"; 0 = "Fairly or more"	1 = "Barely or less"; 0 = "Fairly or more"
Agency Participated in Referral Network	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
After-hours Service Provided	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
Use of Culture-specific Approaches	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
Efforts to Pair Non-English-Speakers with Jobs Without English Requirement	1 = "To a small extent or less"; 0 = "To a moderate extent or more"	n/a
Agency Participated in Relevant Outreach Events	1 = "Seldom or less"; 0 = "Sometimes or more"	1 = "Seldom or less", 0 = "Sometimes or more"
Hispanic Representation in Program Materials	1 = "Seldom or less"; 0 = "Sometimes or more"	1 = "Seldom or less", 0 = "Sometimes or more"
Applicant's Documents Collected: Social Security Number	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Applicant's Documents Collected: Birth Certificate	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Applicant's Documents Collected: Passport	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Applicant's Documents Collected: Driver's License	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Applicant's Documents Collected: Bank Statements	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Other Household Members' Documents Collected: Vehicle Registration	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Other Household Members' Documents Collected: Social Security Number	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Other Household Members' Documents Collected: Birth Certificate	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Other Household Members' Documents Collected: Passport	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Other Household Members' Documents Collected: Driver's License	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Other Household Members' Documents Collected: Bank Statements	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Additional Documents Collected	1 = "Yes"; 0 = "No"	1 = "No"; 0 = "Yes"
Yearly Retention Rate: Frontline Staff	n/a	1 = "Retained below the median retention rate"; 0 = "Retained above the median retention rate"
Yearly Retention Rate: Supervisors and Office Managers	n/a	1 = "Retained below the median retention rate"; 0 = "Retained above the median retention rate"
Likelihood of Deterring Ineligible Hispanic Families from Applying	1 = "Neither likely nor unlikely or more likely"; 0 = "Somewhat or extremely unlikely"	n/a
Proportion of Frontline Staff: Hispanic	1 = "Below median"; 0 = "At or greater than median"	n/a
Proportion of Frontline Staff: Spanish Proficient	1 = "Below median"; 0 = "At or greater than median"	n/a
Proportion of Supervisors and Office Managers: Hispanic	1 = "Below median"; 0 = "At or greater than median"	n/a
Proportion of Supervisors and Office Managers: Spanish Proficient	1 = "Below median"; 0 = "At or greater than median"	n/a
Emphasis on Recruitment of Hispanic Individuals: Staff Positions	1 = "To a small extent or less"; 0 = "To a moderate extent or more"	1 = "To a small extent or less"; 0 = "To a moderate extent or more"
Emphasis on Recruitment of Hispanic Individuals: Board or Senior Positions	1 = "To a small extent or less"; 0 = "To a moderate extent or more"	1 = "To a small extent or less"; 0 = "To a moderate extent or more"
Emphasis on Recruitment of Spanish-speaking Individuals: Staff Positions	1 = "To a small extent or less"; 0 = "To a moderate extent or more"	1 = "To a small extent or less"; 0 = "To a moderate extent or more"
Relationship between Program and Community Advocates	1 = "To a small extent or less"; 0 = "To a moderate extent or more"	n/a
Staff Training Frequency: General Training	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"
Staff Training Frequency: Support for Illiterate Clients	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"

Staff Training Frequency: Support for Non-English-Speaking Clients	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"
Staff Training Frequency: Support for Hispanic Clients	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"
Staff Training Frequency: Cultural Awareness	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"
Staff Training Frequency: Prejudice and Bias	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"
Staff Training Frequency: Documentation Guidance	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"
Staff Training Frequency: General Immigrant Eligibility	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"
Staff Training Frequency: 5-Year Restriction Immigrant Eligibility	1 = "Once every two years or less often"; 0 = "Once a year or more often"	1 = "Once every two years or less often"; 0 = "Once a year or more often"
Frequency of Relevant Case Practice Review	1 = "Sometimes or less frequently"; 0 = "Often or more frequently"	1 = "Sometimes or less frequently"; 0 = "Often or more frequently"
Provided Trainings to Help Staff Work with Hispanic Clients	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
Staff Corresponded with Other Programs: Outreach to Hispanic Families	n/a	1 = "No"; 0 = "Yes"
Staff Corresponded with Other Programs: Barriers to Access for Hispanic Families		1 = "No"; 0 = "Yes"
Office Average Wait Time	1 = "Longer than 30 minutes"; 0 = "Less than 30 minutes"	1 = "Longer than 30 minutes"; 0 = "Less than 30 minutes"
Office Provided Relevant Cultural Cues for Hispanic Clients	1 = "Seldom or less"; 0 = "Sometimes or more"	n/a
Extent to Which Hispanic Clients Factored into Office Location	1 = "Somewhat or less"; 0 = "A lot or more"	1 = "Somewhat or less"; 0 = "A lot or more"
Present at TANF Office: Metal Detectors	n/a	1 = "No"; 0 = "Yes"
Present at TANF Office: Private Security Officers	n/a	1 = "No"; 0 = "Yes"
Present at TANF Office: Bulletproof Glass	n/a	1 = "No"; 0 = "Yes"
Presence of Immigration Enforcement Agents in Office Allowed	n/a	1 = "No"; 0 = "Yes"
Immigration Enforcement Agents Ever Present in Office	n/a	1 = "No"; 0 = "Yes"
Law Enforcement Officers Ever Present in Office	n/a	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Child Care	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: English as a Second Language (ESL)	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Legal Aid	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Transportation Assistance	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Teen Pregnancies Support Groups	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Early Childhood Education	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Substance Abuse Support	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Driver's License Restoration	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Refugee Resettlement	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
On-site Program Service Offer: Representatives from SNAP, Medicaid, etc.	1 = "No"; 0 = "Yes"	1 = "No"; 0 = "Yes"
Provided Know Your Rights Information	1 = "No"; 0 = "Yes"	n/a
Intercultural Effectiveness Scale (IES)	1 = "Below median"; 0 = "At or greater than median"	n/a
Legal Aid Service Offered: General Legal Aid	n/a	1 = "No"; 0 = "Yes"
Legal Aid Service Offered: Immigration Legal Aid	n/a	1 = "No"; 0 = "Yes"
Legal Aid Service Offered: Housing Legal Aid	n/a	1 = "No"; 0 = "Yes"
Legal Aid Service Offered: Family Law Legal Aid	n/a	1 = "No"; 0 = "Yes"
Legal Aid Service Offered: Domesti Violence or Assault Legal Aid	n/a	1 = "No"; 0 = "Yes"
Legal Aid Service Offered: Legal Aid in Spanish	n/a	1 = "No"; 0 = "Yes"
Legal Aid Service Offered: Other Legal Aid	n/a	1 = "No"; 0 = "Yes"

Note: PRWORA = Personal Responsibility and Work Opportunity Reconciliation Act of 1996.

Appendix Table 2. Descriptive statistics of de jure and de facto indices, cash assistance

	Practice Indices		Policy Index - TANF	
	AB	**CM**	**AB**	**CM**
National				
Mean	n/a	n/a	0.2819	0.3563
Minimum	n/a	n/a	0.0000	0.1143
Maximum	n/a	n/a	0.6364	0.7500
SD	n/a	n/a	0.1890	0.1337
11 states				
Mean	0.5351	0.5808	0.4889	0.2835
Minimum	0.4361	0.5121	0.3913	0.1143
Maximum	0.7460	0.6531	0.6364	0.4571
SD	0.0842	0.0533	0.0843	0.1115
States				
anon.	0.5604	0.5152	0.6364	0.1143
Arizona	0.6119	0.6415	0.5652	0.4000
California	0.4727	0.5121	0.4783	0.3143
Colorado	0.5136	0.6481	0.3913	0.3143
Connecticut	0.5487	0.5238	0.4348	0.1714
Louisiana	0.7460	0.6531	0.4783	0.4571
Nevada	0.4361	0.5308	0.4783	0.3714
New Mexico	0.4648	0.6182	0.4783	0.2286
North Carolina	0.5418	0.5697	0.6364	0.4000
Oregon	0.4477	0.6150	0.3913	0.2000
Pennsylvania	0.5418	0.5618	0.4091	0.1471