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*Administrative Burdens and Inequality in
Policy Implementation*

Part II

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Administrative Burdens and Inequality in Policy Implementation, Part II

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and Donald Moynihan

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Introduction: Administrative Burden as a Mechanism of Inequality in Policy Implementation



PAMELA HERD, HILARY HOYNES, JAMILA MICHENER, AND DONALD MOYNIHAN

Administrative burdens are the frictions that people face in their encounters with public services, leading to meaningful costs that include learning, compliance, and psychological costs. We offer evidence that burdens are a key source and consequence of inequality, resulting in disparate outcomes in people's access to basic rights. We also detail how these outcomes are patterned by targeting, federalism, bureaucratic pathologies, and the growing use of the private sector and tax system to deliver social welfare benefits. Throughout, we highlight recent and novel contributions, including empirical research in this double issue, that have helped clarify how and why administrative burdens shape inequality. Burdens have not received the political, policy, or research priority that is commensurate with their magnitude or impact on individuals. We conclude by arguing that we need a coherent language and framework to recognize and, where appropriate, reduce burdens across a wide array of policy domains.

Keywords: social safety net, administrative burdens, welfare state

Policy debates often (and rightly) center on what people need. What resources, protections, or supports are most critical in their daily lives? We have seen successful policy changes to broaden access to health insurance, college, childcare, special education supports, affordable housing, and other safety net supports. What good are these policies, however, if we

cannot access the benefits associated with them?

The gap between people's needs and the policies that are supposed to provide for them is filled with administrative burdens. Administrative burdens are rooted in laws, organizational rules, and everyday implementation practices. Burdens are a barrier to limit access

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1. Author order is alphabetical.

to everything from formal citizenship to voting rights to the resources required to enjoy social rights, such as education, housing, and health care. Burdens also emerge in the state use of coercive power in contexts such as the criminal legal system, or child protective services (Edwards et al. 2023, this volume, issue 5). Across these and other venues, burdens tend to fall more heavily on more marginalized groups, undermining their claim to citizenship rights. Further, burdens are often not just a result of inattention or lack of capacity, but also the product of deliberate design.

To take one example, encouraged by the Donald Trump administration, Arkansas added a (now defunct) work reporting requirement to its Medicaid program with claims that it would boost employment. Such gains never emerged. Instead, more than eighteen thousand people lost health insurance coverage. One study estimated that an astonishing 95 percent of those who lost coverage were still eligible because they were working or should have been exempted from the work requirement (Sommers et al. 2019; Sommers et al. 2020; Wagner and Schubel 2020). Many were unaware of the new requirements. Those who attempted to report work faced a cumbersome process, including an online-only documentation system that proved difficult to navigate. The impact of these changes was both substantial and unevenly distributed. Racial disproportionalities in the Arkansas Medicaid program made Black program beneficiaries particularly vulnerable (Sommers et al. 2019). Black people make up roughly 15 percent of the state population but 26 percent of Medicaid beneficiaries. More than 47 percent of Black Arkansans rely on Medicaid relative to 25 percent of their White counterparts. As a result, the large-scale loss of Medicaid coverage sparked by work reporting requirements had implications for racial inequity (Michener 2020).

This example illustrates the relevance of our central argument: we need to shift attention from policy potential and promises to concrete access. Understanding the origins, experience, and consequences of administrative burden allows us to make this shift. In doing so, we focus on people's experience of government as well as the administrative processes that shape

those experiences. A fuller understanding of the administrative state and inequality means seeing and measuring burdens as well as their consequences.

To "see" burdens, we need to better examine where they come from and how they operate. This double issue shows us key points of demarcation. One is the distinction between universal and means-tested programs. In the 1980s and 1990s, attention to administrative burdens in policies and programs were largely focused on targeted poverty-based programs such as Aid to Families with Dependent Children. The general view was that targeted policies had high levels of burdens, whereas universal social insurance policies, such as unemployment insurance and Medicare, were relatively more accessible. As we detail, however, the sources of burdens as well as the types of programs they are embedded within cannot be explained by simply focusing on whether policies are targeted or universal. In some cases, more universal programs can have large burdens. Indeed, as Zachary Parolin, Christina Cross, and Rourke O'Brien (2023, this volume, issue 5) demonstrate, increases in burdens in both Temporary Assistance to Needy Families (TANF), a classic targeted policy, and unemployment insurance (UI), a New Deal-era universalist social insurance policy, explain accelerating racial inequalities in take-up of U.S. social welfare benefits.

The presence of multiple actors and conflicting incentives in service delivery also contribute to burdens. Programs managed by a mix of federal, state, and local partnerships are typically more complicated and less accessible. For-profit providers that deliver social welfare benefits further fragment the map of service delivery and sometimes have incentives to make policy benefits inaccessible, whether private insurers participating in the Medicare program or private agencies providing job training to welfare participants.

Another key demarcation in the functioning of burdens include those between rights-granting and rights-depriving programs (Brown 2023, this volume, issue 5; Edwards et al. 2023, this volume, issue 5) as well between state administered and third-party administered pro-

grams (DeLuca, Katz, and Oppenheimer 2023, this volume, issue 5; Yu 2023, this volume, issue 4). Even further, comparing the experiences of individual programs is not always the best analytical approach; doing so can obscure the cumulative consequences of having simultaneous experiences with multiple programs (Sackett and Lareau 2023, this volume, issue 4).

If burdens are so important, why have they historically received relatively little attention? After all, they are hardly an unfamiliar topic. Ask anyone about their interactions with government, and chances are you will get an earful about a seemingly Kafka-esque experience that they or a family member has faced trying to access vitally important social rights such as health care, income support, unemployment, and food assistance, or a fundamental political right, such as voting (Lowrey 2021).

Administrative burdens have the odd combination of being both grindingly familiar to us as individuals, and largely unattended as a matter of policy analysis, design, and practice. They are a widely observed fact of life, but not a widely used conceptual tool to analyze life. One explanation for this failing is the fragmented discourse around them, siloed both across and within academic disciplines and policy areas. We are social scientists who share an interest in policy, but who assess it from different perspectives: as an economist, a political scientist, a sociologist, and a public administration scholar. The interdisciplinary nature of our team reflects both an acknowledgment of the benefit of a diversity of approaches and the need for cross-disciplinary communication. The economist and sociologist uncovering burdens in a social welfare program are often not talking to each other. Similarly, the policy analyst thinking about hassles in education does not share their insights with the Supplemental Nutrition Assistance Program (SNAP) expert. In large part, this is because they do not conceive as burdens as a single analytical concept but are more apt to think of them as specific to a policy domain or area of study. Rather than a general toolbox for reducing burdens, we are left instead with lots of little toolboxes, bereft of enough instruments to comprehensively address the problem.

This article seeks to advance a standard way to talk about burdens, whether in research, applied practice, or in policy debates. There is power in legibility and coherence. Naming something allows us to see it more clearly. It is difficult to accumulate knowledge when researchers use different terms and miss entire bodies of research. Framing something allows us to understand its consequences and to consider how to address it. These basic points are true for different but related domains: social science, politics, and policymaking.

In the following sections, we break down the types of costs in administrative burdens and offer some examples of their effect in different policy domains and the ways they reinforce patterns of inequality. We consider the sources of burdens before looking at potential ways to reduce them. In each section, we highlight recent innovations that have helped build and deepen our understanding of burdens and their consequences, including many from this collection. Table 1 summarizes the key insights we draw from the emerging body of research on administrative burden and provides the roadmap for our discussion in remaining sections.

ADMINISTRATIVE BURDEN AS A KEY PART OF POLICY IMPLEMENTATION

We start by providing a conceptual framework to understand people's experience of onerous policy administration. Crucially, a focus on costs shifts attention to the individual's experiences and beyond the perspective of state actors or institutions (Michener, SoRelle, and Thurston 2022). This draws and builds on efforts to articulate the basic idea and consequences of burdens (Bozeman 2000; Currie 2004; Moffitt 1983). Most burdens can be categorized in terms of one of three costs: learning, compliance, and psychological costs (see table 2) (Herd and Moynihan 2018). In practice, such costs may be correlated and overlap, but they are distinct enough to consider separately (Madsen, Mikkelsen, and Moynihan 2022). Doing so allows us to describe, diagnose, and communicate the nature of the burdens at play. We cannot fix problems we do not clearly identify.

Table 1. Fourteen Lessons About Administrative Burden

1. We can and should study administrative burdens as a key aspect of policy implementation.

The effects of administrative burdens

2. Burdens have large effects on access to rights and public services.
3. Burdens facilitate social control.
4. Burdens reinforce inequality.
5. People with fewer resources are less equipped to manage burdens.
6. The effects of burdens accumulate over time.

Sources of administrative burdens

7. Burdens are policymaking by other means.
8. Policy design matters, but universalism is not a sufficient fix.
9. Bureaucracies are not naturally inclined to detect and minimize burden.
10. The federated and fragmented nature of U.S. policy implementation enhances burdens.
11. Third parties can buffer or amplify burdens.

Toward simple, accessible, and respectful government

12. Administrative data and technology can help, with caveats.
13. Nudges are not enough to reduce burdens; sometimes help is needed.
14. Practical burden-reduction policy frameworks are emerging.

Source: Authors' compilation.

Table 2. Three Components of Administrative Burden

Learning costs	Time and effort expended to learn about the program or service, ascertaining eligibility status, the nature of benefits, conditions that must be satisfied, and how to gain access.
Compliance costs	Provision of information and documentation to demonstrate standing; financial costs to access services (such as fees, legal representation, travel costs); avoiding or responding to discretionary demands made by administrators.
Psychological costs	Stigma arising from applying for and participating in an unpopular program; loss of autonomy that comes from intrusive administrative supervision; frustration at dealing with learning and compliance costs, unjust or unnecessary procedures; stresses that arise from uncertainty about whether a citizen can negotiate processes and compliance costs; fear about the coercive face of state power.

Source: Adapted from Herd and Moynihan 2018.

LEARNING COSTS

Learning costs are the challenges that people face finding out about a program's existence and benefits, determining whether they are eligible for the program and what benefits they might receive, as well as understanding how to apply for, retain, and redeem benefits.

You cannot access a program or benefit if you do not know that it exists or you do not know you are eligible for it. The Earned Income

Tax Credit (EITC) is an important example. The EITC is the second largest income support policy, only lagging behind Social Security. It is the largest antipoverty program for children and reduces the number of children living in poverty by 25 percent (CBPP 2019). A single parent, with two children, earning just under \$48,000 can receive a benefit up to \$5,980 (2021 tax law). Approximately 20 percent of those eligible for the benefit do not receive it, however. That

some are unaware of the program is part of the problem. One issue is that many eligible people do not file taxes because their incomes are low enough that they are not required to file. Nearly two-thirds of those eligible, but who fail to claim the EITC, do not file a tax return (Census Bureau 2013). A study among childless tax filers eligible for the EITC but who did not apply for it found that simply notifying them and explaining the potential benefit increased take-up by 31 percentage points (Bhargava and Manoli 2015).

Learning costs are likely to be especially high for benefits that are less familiar, such as new programs or rarely used programs. A key barrier to housing assistance during the pandemic was simply not knowing that housing assistance was available (Aiken, Ellen, and Reina 2023, this volume, issue 5). Even knowledge that the program exists is not necessarily enough, though, because individuals then need to learn how to negotiate a new set of administrative processes. A substantial barrier to accessing emergency assistance after Hurricanes Katrina and Rita was not knowing what was needed to access that aid (Raker and Woods 2023, this volume, issue 5). Learning costs can also extend beyond the administrative processes that occur directly within bureaucracies. The process of redeeming benefits for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)—the third-largest food assistance program in the United States—presented program participants with distinct challenges as they figured out what they could buy, given the limits of WIC food packages, and where they could buy it, given variability in the selection of WIC-approved foods across retailers (Barnes 2021; Barnes, Halpern-Meekin, and Hoiting 2023, this volume, issue 5).

COMPLIANCE COSTS

Compliance costs involve the time and effort spent on the often tedious task of filling out forms, documenting status, or responding to bureaucratic directives. It includes the time spent waiting on hold, or driving to an administrative office. Jennifer Bouek (2023, this volume, issue 5) highlights an underexplored time cost—the time spent on wait lists trying to ac-

cess benefits such as childcare—and shows that in some cases it can be years, rendering services inaccessible for many. Clients had to actively maintain their spots on wait lists, with many people getting kicked off because they could not manage that process. Compliance costs also incorporate financial expenses, such as funds needed to order documents, pay a fee to participate in a program, or hire an advocate. Such costs can also be enormously consequential in terms of how compliance affects benefit access.

In a notable example, Tennessee dropped approximately 10 percent of Medicaid-enrolled children from the program in an onerous recertification process. Renewal occurred only by mail. Mail-in forms often do not reach target populations, mostly because poorer families move frequently. Families that failed to complete the forty-nine-page form, returned it late, or made errors, lost their health insurance. Almost 250,000 children lost coverage, the majority because the forms were not returned, incomplete, or late (Arbogast, Chorniy, and Currie 2022; see also Heinrich et al. 2021). Tennessee was one of many states that introduced new burdens to their Medicaid programs between 2016 and 2019. The result was to reverse a long-term trend of increasing health insurance coverage for children. Such burdens reduced public insurance coverage of children by an estimated 5.4 percent within a year of adoption (Arbogast, Chorniy, and Currie 2022).

Although it is challenging to access public programs such as SNAP or Medicaid (Barnes 2021; Homonoff and Somerville 2021; Michener 2018, 2019; Unrath 2021), it is often just as difficult use them. Recent work by Carolyn Barnes (2021) contributes to the conceptual framework by identifying an additional cost: redemption costs. In short, it is not just the costs of accessing and maintaining access to basic rights and benefits, it can also be the process of actually using benefits. The WIC program, for example, has an incredibly complex set of requirements, that are frequently changing, regarding what foods can be bought with these benefits. Barnes's work finds that the process is so complicated, some beneficiaries effectively abandon the program.

By contrast, alleviating the burden of com-

pliance costs can improve the experiences of program beneficiaries. When compliance costs lessened as the result of remote appointments in response to the COVID-19 pandemic, WIC participants reported having an easier time accessing and maintaining their benefits (Barnes and Petry 2021).

PSYCHOLOGICAL COSTS

Perhaps the least understood category is psychological costs. These include stress, frustration, anxiety, loss of autonomy, or sense of stigma that arise from trying to access and maintain as well as use benefits or services. The concept of stigma is long standing (Moffitt 1983) and the idea of frustrations from paperwork is both intuitive and observable at a physiological level (Hattke, Hensel, and Kalucza 2020). Research on stigma is the most well developed among the psychological costs, with evidence pointing to significant variance in its impact. Research on food stamps has shown that participants can feel stigmatized, such as being shamed at the grocery store (Rogers-Dillon 1995). Research on the EITC, however, finds little evidence of associated stigma, perhaps reflecting its link to paid employment and its framing as a tax benefit rather than a welfare program (Bhargava and Manoli 2015; Halpern-Meekin et al. 2015).

Other kinds of psychological costs go beyond stigma. The stakes are high for those failing to navigate these burdens. Worrying that you cannot feed your children or access critical medical care is obviously stressful (Lowrey 2021). Evidence is robust that high levels of cumulative stress, including that associated with adversity, can be damaging (Herd and Moynihan 2020). Interactions with social welfare systems can also be humiliating or degrading. More nuance is needed to understand other psychological costs. In many respects, qualitative studies that describe people's experiences are better attuned to the nuances of psychological costs and how they shape people's interpretation of the state (see, for example, DeLuca, Katz, and Oppenheimer 2023, this volume, issue 5; Barnes, Halpern-Meekin, and Hoiting 2023, this volume, issue 5; Michener 2018).

Our understanding of psychological costs is

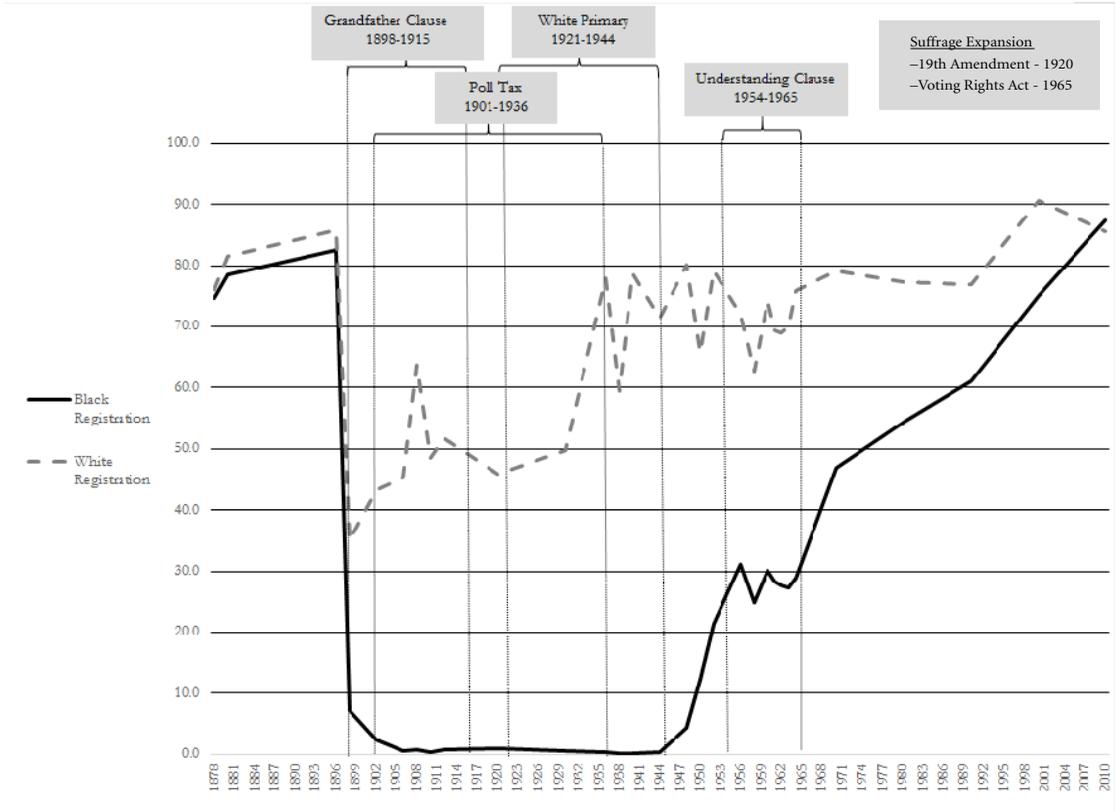
sharpened by contributions in this double issue. First, the nature of psychological costs in coercive or rights-depriving venues is likely to extend beyond stress, frustration to incorporate fear, or the experience of deprivation (Brown 2023, this volume, issue 5; Edwards et al. 2023, this volume, issue 5; Moynihan, Herd, and Gerinza 2022). Second, although we focus primarily on psychological costs for the participants and beneficiaries, imposing or negotiating burdens can also be experienced as stressful or demotivating for public servants at the frontlines, or for third-party actors trying to help. For example, Lilly Yu (2023, this volume, issue 4) reports that immigration lawyers experienced the deliberate imposition of immigration burdens by the Trump administration to be demotivating, making it more difficult to attract and retain employees. A senior attorney said, "All my attorneys tell me 'I'm feeling overwhelmed, I'm feeling stressed.' We have, network-wide, lost a lot of attorneys because of exhaustion and stress. One came back after a year absence, part-time. But, um, a lot of time we—I remember one young attorney was like, 'I started doing this under Obama and I just can't do this anymore.' And she just quit, you know, she just can't take it. So we see that a lot."

THE EFFECTS OF ADMINISTRATIVE BURDENS

In this section we summarize the ways in which administrative burdens affect access, outcomes, and inequality. We describe the evidence along five main themes: access, social control, inequality, incidence, and the accumulation of burdens.

BURDENS HAVE LARGE EFFECTS ON ACCESS TO RIGHTS AND PUBLIC SERVICES

The ubiquitous and mundane nature of administrative burdens may lead us to systematically underestimate the scale of their effects on access to basic rights and services. To illustrate this point, we offer two examples. First, burdens have been central in restricting access to the ballot, the most fundamental political right in a democracy (Herd and Moynihan 2018). As the franchise was nominally extended to Black voters, burdens became the way governments

Figure 1. The Enduring Racialized Effect of Burdens in Voting, Louisiana Registration Rates, 1878–2000

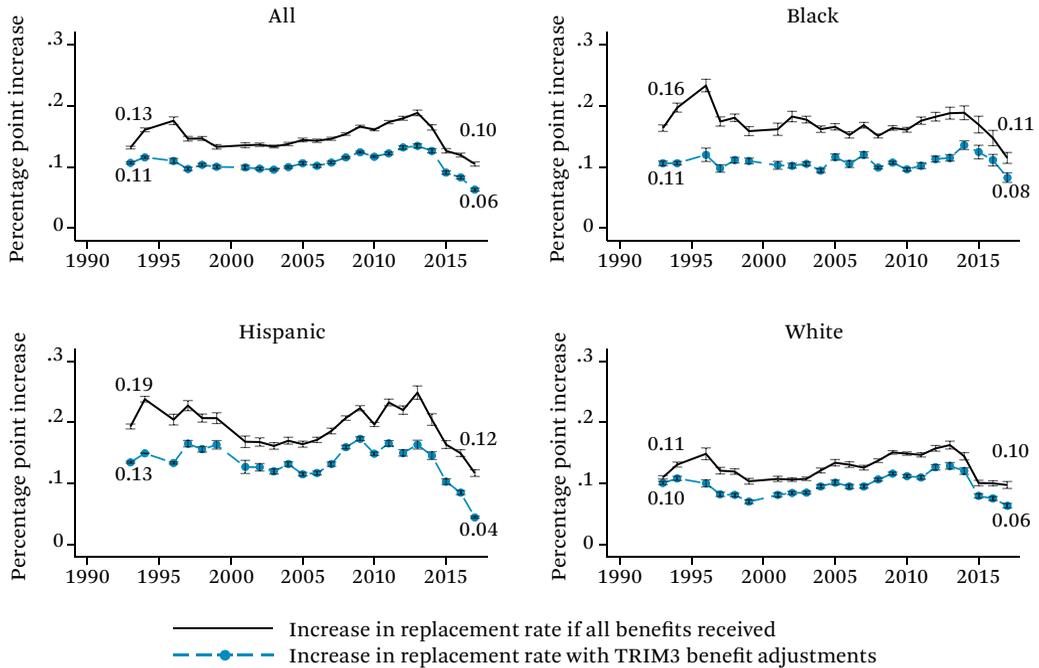
Source: Keele, Cubbison, and White 2021. Reprinted with permission.

constrained their political power. The record of voter registration in Louisiana is an example. Before the 1898 Louisiana constitution, Black and White voters had similar registration rates. Unable to formally bar newly empowered Black voters, the White power structures relied on a mix of literacy tests, poll taxes, and property requirements, even as they exempted more Whites from such clauses using grandfather clauses and discretionary application of the rules by election officials. When one method of exclusion was removed, another took its place, until the Voting Rights Act of 1965 (Keele, Cubbison, and White 2021). Even with federal guarantees, the effects of these practices were so enduring that it was not until the start of the twenty-first century that Black Louisianans regained the voter registration parity they had held a century earlier (see figure 1).

A second example is provided by Parolin, Cross, and O' Brien (2023, this volume, issue 5),

who estimate, using Current Population Survey data from 1990 to 2019, how much administrative burdens limit access to cash and near-cash transfers that people are eligible for after a family member loses a job. Their approach represents a thought experiment about what the reach of the social safety net might look like if burdens were low enough that all families eligible to receive a given benefit should do so. The results point to a significant and large gap between earnings replacement rates—the share of lost earnings made up for with social safety net benefits—under current practice and the counterfactual. Figure 2 presents the actual and counterfactual replacement rates for all—Whites, Blacks, and Hispanics. Although replacement rates are declining across this period for all subgroups, the scale of the administrative burden effect remains consistently large, indicating that families experiencing job loss could receive replacement rates up

Figure 2. Observed and Counterfactual Replacement Rates If Families Experiencing Joblessness Received All Income Transfers for Which They Are Eligible (No “Administrative Burden” Effect)



Source: Parolin, Cross, and O’Brien 2023, figure 3 (this volume, issue 5).

to 10 percentage points higher in a condition of zero burdens relative to current practice. If the scale of such effects is surprising, it may reflect our tendency to underestimate the effects of burdens.

These burdens can be so large that reducing them can have just as large an impact as expanding eligibility for a program. Emily Rauscher and Ailish Burns (2023, this volume, issue 4) demonstrate how cumulative reductions in burdens in Medicaid had as large of an impact on infant health as the Affordable Care Act (ACA) Medicaid expansion did.

BURDENS FACILITATE SOCIAL CONTROL

The primary focus of administrative burden research thus far has been on limiting access in rights-granting venues, such as political rights or access to benefits. However, as contributors to this double issue point out, burdens also matter as a method of social control in rights-depriving venues, that is, citizen-state interactions in which people have involuntary contact with coercive state institutions (Ed-

wards et al. 2023, this volume, issue 5; see also Brown 2023, this volume, issue 5). An obvious example is the criminal legal system. For example, Black Americans express a stronger sense of fear about interacting with the police (Pickett, Graham, and Cullen 2021), even as the police represent the more direct and present face of government for many Blacks (Soss and Weaver 2017). Frank Edwards and his colleagues (2023, this volume, issue 5) point to child protective services as another such venue, where administrative burdens are a key component of contemporary punitive and racialized poverty governance. Another example is immigration, where administrative burdens have been weaponized with the goal of creating fear among both undocumented immigrants, and those seeking legal refugee status (Moynihan, Herd, and Gerinza 2022; Yu 2023, this volume, issue 4).

The role of burdens in rights-restricting domains is less well understood. It is reasonable to assume that given the stakes involved—loss of liberty, familial rights, legal status—the consequences of burdens in such venues may be

greater, reflected in more intense psychological costs such as fear or despair. Burdens can both lock people out of desired benefits and lock them into unwanted long-term involvement with punitive state organizations.

One way burdens facilitate social control function is via entry into and exit from different administrative categories. In some cases, such as establishing disability, burden limits access to desired categories that provide additional income supports, help, or relaxation of standard administrative demands such as work requirements (Sommers et al. 2020). In others, however, burdens make it difficult to escape from undesired categories, such as *deficient parent*, itself a psychologically degrading identity the parent has to both accept and document that they have graduated from in order to exit the system (Edwards et al. 2023, this volume, issue 4).

BURDENS REINFORCE INEQUALITY

Administrative burdens tend to exacerbate patterns of inequality. This is a consistent theme across the articles in this double issue. Parolin, Cross, and O'Brien (2023, this volume, issue 5) find that administrative burdens contribute to higher poverty rates and lower income rates for Black and Hispanic families experiencing job loss than for White families. These racialized burdens are also evident in higher education (Ray, Herd, and Moynihan 2023). Among those with high student loan debt, those living in lower-income and higher-percentage Black neighborhoods are less likely to take advantage of administratively complex but highly beneficial repayment plans provided by the federal government (Goldstein et al. 2023, this volume, issue 4). Applications for disaster support after Hurricane Katrina result in higher rate of denials for documentation reasons when they came from zip codes characterized by higher poverty rates and more people of color (Raker and Woods 2023, this volume, issue 5). Burdens that reduce public health insurance for children have a larger impact on Hispanic families, those with a noncitizen parent, and those without a college-educated parent (Arbogast, Chorniy, and Currie 2022). If burdens hurt marginalized groups, this also implies that efforts to reduce burdens reduce inequalities. Step-

hanie Pierce and Stephanie Moulton (2023, this volume, issue 5) point out how relaxing documentation requirements tended to help avoid foreclosure for those with the most difficult-to-document situations, who were more likely to be Black and women. Reductions of Medicaid burdens also tended to benefit marginalized groups (Rauscher and Burns 2023, this volume, issue 4).

Burdens reinforce inequality via three main mechanisms. First, the reach and effectiveness of programs intended to provide a measure of equality is undermined by administrative burdens. To the degree that programs designed to provide baseline support for people living in poverty are inaccessible, they are unable to achieve their policy goals.

Second, some groups are more targeted by burdens than others, even within the same benefit system. Our ideas about who is—and is not—deserving of government benefits are reflected in how we deliver those benefits and services. Our tax system, which has become an important mechanism for distribution and redistribution, benefits the White and well-off, by making programs such as subsidized employer provided health insurance and home ownership simple and accessible. Benefits for the working poor, such as the EITC, have higher layers of burdens (and higher rates of auditing). Even in the near universal, albeit temporary, Child Tax Credit (CTC) expansion (available in 2021), burdens were largely faced by the poorest beneficiaries. In particular, those who had filed a tax return for 2019 or 2020 received the monthly CTC payments automatically and, for many, via direct deposit; those who had not filed taxes, that is, those with the lowest income levels and thus not required to file, had to apply for the benefit.

Groups with less access to political power are more vulnerable to the imposition of hassles. It is not just that women, poor, Black, and disabled Americans differentially bear the brunt of them, burdens are in fact rooted in racism, sexism, and ableism (Ray, Herd, and Moynihan 2023). The relationship between political power, perceived deservingness and the targeting of burdens reflect the point that burdens do not just reinforce patterns of inequality; they are also the product of inequality.

Those deemed undeserving are also exposed to burdens in rights-depriving venues like child welfare bureaucracies (Brown 2023, this volume, issue 5; Edwards et al. 2023, this volume, issue 5). The burdens that tribal governments and their community manage in child welfare cases reflects the gap between the promise of tribal sovereignty and actual political power (Brown 2023, this volume, issue 5).

The third way that burdens reinforce inequality is unequal distribution of resources needed to overcome them. We consider this point in greater detail in the next section.

PEOPLE WITH FEWER RESOURCES ARE LESS EQUIPPED TO MANAGE BURDENS

Our perspective on the relationship between burdens and inequality challenges existing theories that have justified burdens as a way to ration public services programs. Referred to as ordeal mechanisms (Nichols and Zeckhauser 1982; Zeckhauser 2021), this model follows some straightforward assumptions: not everyone who qualifies for public benefits actually needs them; people value the time and effort required to manage burdens, and thus will rationally opt out of these hassles if they are high relative to the potential benefits. The ordeals perspective offers policymakers a reassurance that burdens fulfill a useful social function by optimally targeting scarce resources to those most in need.

A framework that presents burdens as an ordeal mechanism creates some blind spots. One is that targeting may be counterproductive. For example, hassles reduce take-up of health insurance and are most likely to discourage the type of people—younger and healthier—the insurance pool needs to balance the numbers of older and sicker participants (McIntyre, Shepard, and Wagner 2021). In such cases, automatic enrollment not only increases participation for some groups but also generates a collective good. The comparison holds in the quite different policy domain of voting. Evidence is ample that hassles such as voter registration requirements differentially exclude more marginal voters: younger, poorer, minority, or immigrants (Grumbach and Hill 2021; Rigby and Springer 2011; Braconnier, Dormagen, and Pons 2017; Michener 2016). Indeed,

the general gap between rich and poor when it comes to voting is a registration gap, not a voting gap: both poor and rich people who are registered vote at the same level (Herd and Moynihan 2018).

When hassles are not well targeted, they often end up affecting those who most need help. Why might this be the case? If we accept that some burdens are not simply tedious, but also complex and cognitively demanding, those with more resources become more likely to succeed in overcoming them. Here resources can include education, administrative literacy, money, social networks, flexible work schedules, reliable internet and phone connections, cognitive skills, health, and time. As a result, an administrative burden Catch-22 emerges: those needing the most help are less well positioned to overcome the barriers on which that help is conditioned (Christensen et al. 2020). Rather than targeting services only to those who needed them the most, burdens can end up becoming un navigable for those without the resources to deal with them. Pierce and Moulton (2023, this volume, issue 5) find as much when it comes to giving mortgage relief to homeowners in trouble: reductions in burdens made targeting more efficient by helping those who were needy but struggled to satisfy documentation requirements.

The degree to which burdens result in better targeting or exclude the neediest is an empirical question. Evidence from behavioral science seems more consistent with the Catch-22 perspective: individuals experiencing time or financial scarcity will be less apt to manage the hassles involved in administrative processes (Mullainathan and Shafir 2013). Empirical studies beyond those in this double issue also raise concerns about the exclusionary effects of burdens. Families facing poverty deal with more complex life challenges, more administrative demands across multiple programs, with fewer tangible resources or sources of help (Heinrich et al. 2021). A study of Social Security field office closures found that they tended to reduce access to benefits for those with lower income, less education, and more severe disabilities (Deshpande and Li 2019). Amy Finkelstein and Matthew Notowidigdo (2019) point out that frictions in SNAP enrollment tend to be more con-

sequential for lower-income and sicker individuals, who need the benefit more. Mental health problems, such as attention-deficit disorders, are associated with higher reported burden and lower take-up (Bell et al. 2022).

These burdens have implications beyond program access. Negative interactions with government in the form of burden reduce trust in government (Ali and Altaf 2021). For example, the learning costs that result from moving across state lines—because Medicaid eligibility and the rules around documenting that eligibility vary across states and even counties—leads to frustration and distrust, with profound consequences for the health of our democracy (Michener 2018). The deliberate use of ordeals conveys a formal recognition of inequality. In the eyes of the state, some people’s time is of less value than that of others.

THE EFFECTS OF BURDENS ACCUMULATE OVER TIME

Although the categories of learning, compliance, and psychological costs help unpack the frictions that people face in particular encounters or programs, this diagnostic process should not obscure the broader picture of burdens as a cumulative experience. In short, some people are systematically more likely to be exposed to burdens. It is important to remain attentive to the accumulation of burdensome experiences across multiple programs or domains, both rights-granting, such as applying for benefits, and rights-depriving, such as when social services take a child away from a parent (Edwards et al. 2023, this volume, issue 5; Sackett and Lareau 2023, this volume, issue 4). In the former, someone is a claimant, whereas in the latter someone is the subject of the state, but across these domains the costs accumulate. Families seeking help from the safety net are negotiating with multiple institutions. Poorer families seeking help encounter burdens in WIC, childcare supports, public housing, SNAP, and Medicaid. Blair Sackett and Annette Lareau (2023, this volume, issue 4) illustrate this point in their study of refugees negotiating multiple venues, which are both vital and unfamiliar. This patchwork system of in-kind programs, rooted in patriarchal and punishing practices directed at women, people liv-

ing in poverty, and Black individuals, leads to a much larger set of costs than would be present with simple cash assistance.

Even after someone has overcome enrollment burdens to access a benefit, they continue to face redemption costs in using those benefits (Barnes 2021), especially for voucher-based benefits such as housing supports (DeLuca, Katz, and Oppenheimer 2023, this volume, issue 5) and WIC (Barnes 2021). On the one hand, learning costs should mechanically decline with familiarity with an institution or program. A number of articles in this double issue point to the way that the novelty of a new context raises learning costs. Claudia Aiken, Ingrid Ellen, and Vincent Reina (2023, this volume, issue 5) examine how a new rental assistance program struggled to succeed. Sackett and Lareau (2023, this volume, issue 4) examine the challenge facing immigrants negotiating unfamiliar spaces. Yu (2023, this volume, issue 4) documents how immigration lawyers struggled to keep up with a rush of policy changes. However, familiarity may also breed contempt. Negative experiences in using benefits may cause people to exit programs (Barnes, Halpern-Meekin, and Hoiting 2023, this volume, issue 5). The exit, or “churn” of eligible applicants at points of renewal is another juncture where those who have shown a capacity to overcome a set of burdens in the past are no longer willing or able to do so.

For many, the experience of the state is the experience of burdens. People who rely on social welfare programs, from food assistance to the EITC, simply spend more of their lives navigating complicated bureaucracies to meet their basic needs than do those with more resources (Land 2018). Thus the accumulation of burdens will reinforce inequality to the degree that people systematically experience the same sort of burdens in the administrative venues they are assigned. Marginalized groups may look at the history of their experience with the state, and view their interactions through that lens. Using the American Time Use Survey, Stephen Holt and Katie Vinopal (2023) find that low-income people are 3 percentage points more likely to spend part of their day waiting for services, and the duration of their waits are, on average, twelve minutes longer. These dif-

ferences are not based only on income: high-income Black people experience the same wait times as low-income groups.

The effects of the accumulation of burdens should be considered, but burdens can be exceptionally consequential in crucial state interactions. As noted, burdens are especially salient for high-stakes rights-restricting venues, such as child protective services, or for crucial rights, such as voting, or at crucial moments, such as trying to recover from a disaster (such as Raker and Woods 2023, this volume, issue 5). The Joe Biden administration has identified surviving a disaster as one of a series of “moments that matter” when public services should be designed to be accessible. Other such moments include the birth of a child, retirement, transitioning from military to civilian life, financial shocks, and children with disabilities transitioning to adulthood.² A focus on identifying and providing support to such moments of vulnerability is a useful way for governments to think about how to prioritize burden-reduction efforts.

SOURCES OF ADMINISTRATIVE BURDENS

In this section, we summarize the evidence on the sources of administrative burdens including the role of policy design, bureaucratic dysfunction, federalism, and the private provision of social welfare benefits.

BURDENS ARE POLICYMAKING BY OTHER MEANS

If administrative burdens are such a big problem, why tolerate them? Why is it not a core function of governments to relentlessly identify and reduce burdens to the greatest extent possible? These deceptively simple questions also ask why burdens emerge and persist. No single reason explains the phenomenon.

At the broadest level, burdens persist either because they serve an end for some political actors or because the problems they create are kept hidden. Burdens, of course, can reflect normal bureaucratic dysfunction, when administrative actors fail to understand, are in-

different to, or feel they cannot change how state actions and inactions affect how the public experiences the state. Despite individual behavioral reasons that burdens are consequential, such as individuals being present-biased and unwilling to deal with immediate hassles (Frederick, Loewenstein, and O’Donoghue 2002), we focus on issues under the control of the state and consider individual differences only to the extent that they worsen patterns of inequality. Whether burdens are deliberate or accidental, they are largely a function of state choices, including choices not made, to attend to them.

What sort of functional purposes can burdens serve? Processes that give rise to burdens are sometimes necessary for basic administrative tasks, such as distinguishing between those who are eligible and ineligible for a program. Burdens help (or are claimed to help) achieve values that policymakers say they care about, such as reducing fraud, targeting scarce resources to the neediest, or other policy goals, such as encouraging labor-force participation. Burdens can also help achieve outcomes policymakers desire but do not explicitly acknowledge, such as restricting access to the ballot or curtailing abortion services. They also undermine the effectiveness of programs for those who are opposed to those programs or the constituency they serve. Such opposition can coincide with, or be driven by, indifference, paternalism or antagonism toward marginalized groups. For example, Victor Ray, Pamela Herd, and Donald Moynihan (2023, 139) argue that burdens that make it hard to vote emerged “when more explicit forms of racial bias in policies or administrative practices become illegal, politically untenable or culturally unacceptable.”

In other words, burdens often function as a form of policymaking by other means. The utility of burdens and their consequences for inequality are tied to their opacity. The more complex and submerged are the details of program implementation, the less they are subject to close inspection by media or other policymakers.

2. “A Human-Centered Approach to Government,” Performance.gov, n.d., <https://www.performance.gov/cx/projects/> (accessed January 5, 2023).

**POLICY DESIGN MATTERS,
BUT UNIVERSALISM IS NOT
A SUFFICIENT FIX**

Existing theories and research, particularly by social scientists throughout the 1980s and 1990s, largely considered burdens through the lens of policy design or whether benefits should be targeted or universal.

Sociologists and political scientists thought about burdens in the context of universalism versus targeting (Esping-Andersen 1993). In short, universal policies are assumed to be simple, accessible, and popular, whereas means-tested policies are laden with burdens, inaccessible, and unpopular (Skocpol 1991). This work also documents the ways poor and racialized minority women are far more likely to be segregated into targeted and burdensome programs, making this divide a central way that social welfare policies reinforce race and gender inequality (Mink 1998). Programs created by the 1935 Social Security Act make the point. Social insurance programs such as Social Security became generous and accessible, especially for White men, and unemployed White women, whereas means-tested programs such as Aid to Dependent Children, to which Black women had relatively more access, became miserly, inaccessible, and ultimately written out of the Social Security Act altogether (Mink 1998; Quadagno 1994). The same contrast is also drawn between Medicare and Medicaid, both of which were created in 1965 as amendments to the Social Security Act. In part, targeting centered narratives around deservingness and focusing means-tested policies often on populations deemed “undeserving” (Schneider and Ingram 1993). Indeed, survey experiments with politicians show that they become more supportive of imposing burdens when deservingness framings are invoked (Baekgaard, Moynihan, and Thomsen 2021).

However, even though targeting versus universalism continues to hold predictive power regarding how policy design influences burdens and their impacts, a closer look complicates this narrative. In terms of how burdens impact inequality, it is not only that women and Black people end up more subject to hassles because they are more likely to be segregated in targeted programs: even within tar-

geted programs they face more burdens. For example, states with higher proportions of Black workers are more likely to have tougher welfare-sanctioning policies (Hahn et al. 2017) and less spending on cash assistance out of the TANF block grant (Hardy, Samudra, and Davis 2019). It is also the case that, within social insurance programs, Black Americans are more concentrated in burdensome parts of those programs. For example, Black Americans are disproportionately likely to receive Social Disability Insurance rather than Social Security Survivor benefits (Harrington Meyer et al. 2006). Whereas it takes just a few minutes to apply for survivor benefits, disability benefits are laden with burdens. In 2020, it took an average of five to six months for an initial application to be processed (SSA 2021). If an individual had to appeal a denial, they would wait another four months on average for it to be reconsidered (SSA 2021). If it then goes to an administrative law judge, the wait becomes even longer. Given that one-third of disability recipients had to appeal to receive their benefit, the average costs are extraordinarily high (CBPP 2021).

Policy trends in the aftermath of 1990s welfare reform have seen burdens generally cut in targeted programs (Greenstein 2022). Means-tested policies that have grown in size—most obviously EITC, SNAP, and the CTC—also have less burdens and higher take-up than in the past and the programs they now dwarf, such as TANF. At the same time, burdens have become more pronounced in some universal programs. For example, Medicare has become far more complicated to navigate over the last thirty years with the introduction of private health insurance plans for Medicare beneficiaries (Herd and Moynihan 2018; Herd 2021). When beneficiaries enroll in Medicare, they now face a dizzying array of health insurance options. Depending on what they choose, they may actually end up with three separate plans: Medicare Part B, a private Medigap plan, and a private prescription drug plan. The evidence is that most people pick poorly and expose themselves to potentially large financial and health costs (Herd 2021). Further, to ensure they have the best plan to meet their needs, given that their health changes and the plans change, beneficiaries are required to make choices every year.

In contrast, Medicaid has expanded and in some ways become less burdensome over time (Herd and Moynihan 2018), given the removal of asset tests, reductions in paperwork, longer periods between recertification, and a host of other changes driven by the ACA and state discretion (Rauscher and Burns 2023, this volume, issue 4).

BUREAUCRACIES ARE NOT NATURALLY INCLINED TO DETECT AND MINIMIZE BURDEN

Bureaucratic has become a synonym for delay, pointless paperwork, and frustration. Such critiques are often lazy stereotypes that do not recognize the complexity of public services. After all, private organizations also create burdens. Think of how easy private companies make it to sign up for services such as gym membership, a magazine subscription, or a cable package relative to the challenge of canceling those services. Such burdens are often driven by profit incentives. For public bureaucracies that do not have a profit incentive, the dynamics are somewhat different, but still compatible with the creation of burdens (Peeters 2020). The root of these dynamics can be linked not only to politics and organizational culture, but also to the capacity public organizations have to effectively deliver services and benefits.

Public organizations are responsive to political messaging and directives about maximizing political values that result in burdens (Moynihan, Herd, and Harvey 2015). Even absent political pressure, though, they too often lack direct mechanisms of feedback that measure burdens, or incentives to reduce them. Robert Merton (1963) long ago observed that bureaucracies tend toward goal displacement: focusing on rule creation and rule following at the expense of their core purpose. Such tendencies are reinforced by incentives such as blame avoidance and negativity bias, where bureaucrats face greater punishment for failure than benefits for positive outcomes (James et al. 2020). In other words, bureaucrats may be sheltered from knowledge about the negative externalities that rules that generate new burdens create but be acutely conscious that the absence of such rules makes them vulnerable to criticism. For example, Aiken, Ellen,

and Reina (2023, this volume, issue 5) point to administrators mistakenly believing their programs were less burdensome than they truly were, while being closely attentive to the risk of fraud and the potential for federal audits in ways that made burdens more likely to emerge.

Institutional errors—which can be a function of a mistake by a state actor or the client—can have calamitous effects (see Bouek 2023, this volume, issue 5; Raker and Woods 2023, this volume, issue 5; Goldstein et al. 2023, this volume, issue 4; Sackett and Lareau 2023, this volume, issue 4). For example, such mistakes for refugees can cascade, undermining their efforts to establish some stability (Sackett and Lareau 2023, this volume, issue 4). Groups lacking political power have less capacity to draw attention to administrative problems, or win resources to provide solutions (see also Moynihan, Herd, and Gerinza 2022).

Policymakers are also more comfortable with burdens if they are not on the receiving end. Bureaucrats and elected officials in particular tend to be more educated and wealthier than the public generally, making their personal experience less representative of those they serve. Relatively few policymakers have had to worry about negotiating work requirements for SNAP, for example. This lack of experience matters to how policymakers see burdens. Policymakers tend to be more opposed to burdens in means-tested programs when they have personally depended on similar programs in the past (Baekgaard, Moynihan, and Thomsen 2021).

Studies of citizen-state interactions show how street-level bureaucrats can alter each of these types of costs. They can choose to engage in active outreach or withhold information in ways that adjust learning costs. They can impose excessive demands for documentation and paperwork, relax requirements, or even help individuals to overcome compliance costs. They may offer a welcoming setting, conveying to individuals that they are accessing rights rather than supplicants to the state. Some of these choices may reflect personal biases against marginalized groups or ideological beliefs (Bell et al. 2021). Audit studies offer evidence of such biases among street-level

bureaucrats, though not consistently and seemingly less systematically than among other political elites or private actors (for a summary, see Olsen, Kyhse-Andersen, and Moynihan 2022). It would be a mistake, however, to assume such micro-level interactions as purely a reflection of individual biases, given that they may also reflect embedded meso-level administrative practices, which street-level actors are only vaguely aware of, or are resigned to accepting (Ray, Herd, and Moynihan 2023; Compton et al. 2022).

Administrative capacity matters to the ability of bureaucratic actors both to manage burdens themselves and to shift burdens from the individual and onto the state (Herd et al. 2013; Heinrich 2016). For example, Aiken, Ellen, and Reina (2023, this volume, issue 5) detail that a lack of infrastructure and data capacity was a key explanation for the burdensome processes that people encountered when trying to seek housing assistance during the pandemic. Examining a foreclosure program in Ohio, Pierce and Moulton (2023, this volume, issue 5) find that an effort to reduce compliance costs by relaxing documentation requirements helped applicants, but also created congestion because the state lacked the administrative capacity to manage the increased demand that followed. Lack of capacity among state actors may be compensated for by nonstate actors, but they also face capacity constraints. Yu (2023, this volume, issue 4) details how third-party brokers, in the case of immigration attorneys, were overwhelmed during the Trump presidency as the Department of Homeland Security dramatically increased burdens across the immigration process. These immigration lawyers simply did not have the resources to adequately help people navigate these burdens, resulting in stratified access to representation.

THE FEDERATED AND FRAGMENTED NATURE OF U.S. POLICY IMPLEMENTATION ENHANCES BURDENS

A primary lesson emerging from new scholarship on administrative burden is the identification of federalism as a key source of burden. Part of the issue is the basic reality that more players means more veto points and more opportunities to add burdens. Federalism also

means locating service delivery in venues that are subject to less direct attention from the public. For example, federal policies that impose work requirements or new hassles in legislation or executive order are more apt to draw attention and pushback than equivalent changes at the state level.

Programs that involve federal, state, and local control tend to be more complicated and burdensome, and consequently more heavily reinforce race, gender, and class inequality, than those solely controlled by the federal government (Michener 2018). In short, federalism plays a large role in shaping the level of burden in U.S. social welfare programs (Michener 2018; Mettler 2011). For example, although both Social Security and unemployment insurance evolved out of the 1935 Social Security Act and are social insurance programs, control of UI is shared between federal and state governments. The Social Security retirement program is the least burdensome U.S. social program, especially when taking its scope and impact into account. Take-up is nearly 100 percent and users do not need to keep track of, or document, their lifetime earnings. Benefits can be claimed in a matter of minutes, either online or via one of thousands of field offices around the country.

Unemployment insurance is a very different story. Its dysfunction during the pandemic was not just the result of an unusual surge in applications. Even in “normal” times, only about three-quarters of those eligible for unemployment insurance actually receive benefits, with many jobless people deemed ineligible. The fraction of unemployed people receiving benefits ranges from about 10 percent in North Carolina to 57 percent in New Jersey (U.S. Department of Labor 2022). Notably, differences across racial groups are large. Using data through 2015, Elira Kuka and Bryan Stuart (2022) find that only 42 percent of eligible Black individuals receive UI relative to 55 percent of eligible White individuals and 20 percent of the racial gap is accounted for by Black individual’s greater residence in the South. More generally, states with higher proportions of Black workers also tend to have less generous unemployment insurance benefits, with learning costs contributing to low take-up of benefits across all racial

groups (Gould-Werth and Shaefer 2012). Benefit eligibility varies across states in terms of job classifications, wage requirements, and reasons for leaving a job, meaning that many unemployed workers are unaware of their eligibility status (Wandner and Stettner 2000).

Challenges accessing UI during the pandemic reflect prior policy choices made, especially after the Great Recession, to narrow eligibility and broaden burdens (Badger and Parlapiano 2020). The cumulative effect was to reduce the overall fraction of unemployed workers receiving benefits from around 31 percent between 2004 and 2007 to 23 percent between 2012 and 2016 (Vroman 2018). Compliance costs played a key role in this decrease. States such as Florida (Fineout and Caputo 2020) and North Carolina (Lee 2020) confounded the application process with burdens to reduce unemployment insurance spending. Across states, new programs to facilitate employment, such as job counseling and required documentation of job-seeking activities, led to people losing unemployment insurance for failing to meet administrative requirements, rather than to increased employment (Vroman 2018).

Many burdens are structurally induced as subnational governments navigate requirements from the federal level. For example, concern about federal audits triggered more burdens in rental assistance programs (Aiken, Ellen and Reina 2023, this volume, issue 5). Tribal governments with limited resources struggle with the administrative requirements placed on them by state governments in the domain of child welfare, and in some cases states have deliberately limited tribal capacity (Brown 2023, this volume, issue 5).

Federalism is a contributing factor to another source of burdens, which we label here as *administrative fragmentation*: the multiplicity of administrative actors that an individual must interact with to complete a task. It seems axiomatic that administrative costs increase when a person has to negotiate with multiple organizations. Most obviously, learning costs increase because someone must be aware of more than one relevant organization and understand how to engage with multiple sets of rules. Compliance costs also increase as the

person commutes between organizations, and has to provide documentation multiple times to different actors. The frustrations of being shuffled back and forth also mount.

Fragmentation can occur both within and across policy domains. The U.S. health-care system is a very fragmented domain, with some exceptions, such as the Veterans Health Administration, which operates more like a national health system for its users. Adam Goldstein and his colleagues (2023, this volume, issue 4) point to the deleterious effects of fragmentation in student loan programs. Income-driven repayment programs benefit most borrowers, but borrowers must master more than one such program with varying provisions and eligibility. The Department of Education relies on private loan service providers, and when loans are transferred from one servicer to another it can be calamitous for borrowers when basic information is not transferred. Borrowers often have to play the role of their own administrative representative, collecting administrative data, or coordinating organizational relationships between, for example, their bank and lender. Within the broader safety net, different programs may have different rules, definitions, and measurement about things like dependents or assets that make little sense to their users.

Federalism contributes to administrative fragmentation, but it is not the only source. As discussed in the next section, a preference for marketized provision of public services, and a reliance on supportive nonprofits begets fragmentation. A person walking between organizations can get lost. Sackett and Lareau (2023, this volume, issue 4) illustrate how refugees often find themselves tied up in institutional knots in part because they cannot resolve competing or contradictory demands from the multiple organizations they must negotiate with. In other words, it is easier for people to fall through the cracks when the cracks are gaps between organizations.

THIRD PARTIES CAN BUFFER OR AMPLIFY BURDENS

Another critical emerging area of administrative burden research, with important contributions from the articles in this double issue,

involves the role of third parties. Private, non-governmental third-party actors can play multiple roles when it comes to burdens that can reduce or amplify the effects of burdens and associated inequalities: as service providers, as advocates that lobby to increase or reduce burdens, by providing help to users manage burdens, or as the subject of burdens themselves. In discussing immigration, Yu (2023, this volume, issue 4) shows how immigration lawyers can simultaneously help reduce burdens for clients, be the subject of burdens imposed by the state, and reinforce patterns of disparate access by charging a fee for their help. Hilary Hoynes, Nicole Maestas, and Alexander Strand (2022) find that the use of legal representatives significantly speeds up the access to Social Security disability benefits without changing who ultimately receives the income support program. Aiken, Ellen, and Reina (2023, this volume, issue 5), document how burdens increase when emergency rental assistance programs require the participation of both the landlord and tenant. This is what is called a “double take-up challenge.”

Third-party actors are only becoming more important over time. Since the 1990s, the growth in the use of private entities—both non-profits and for-profits—in delivering access to social welfare benefits has clear implications for burdens. The growth of the private sector in delivering social welfare benefits provides another potential source of burdens and subsequent inequalities for some of the same reasons as federalism: more veto players, more room for discretion to impose burdens. Other challenges are specific to private actors. A desire to marketize public services increases learning and compliance costs. Medicare is a clear example (Herd 2021). As of 2020, nearly 40 percent of beneficiaries were exclusively in private health insurance, via their participation in Medicare Advantage, with estimates that this could reach 47 percent by 2029 (Freed et al. 2022; Terry and Muhlestein 2021).

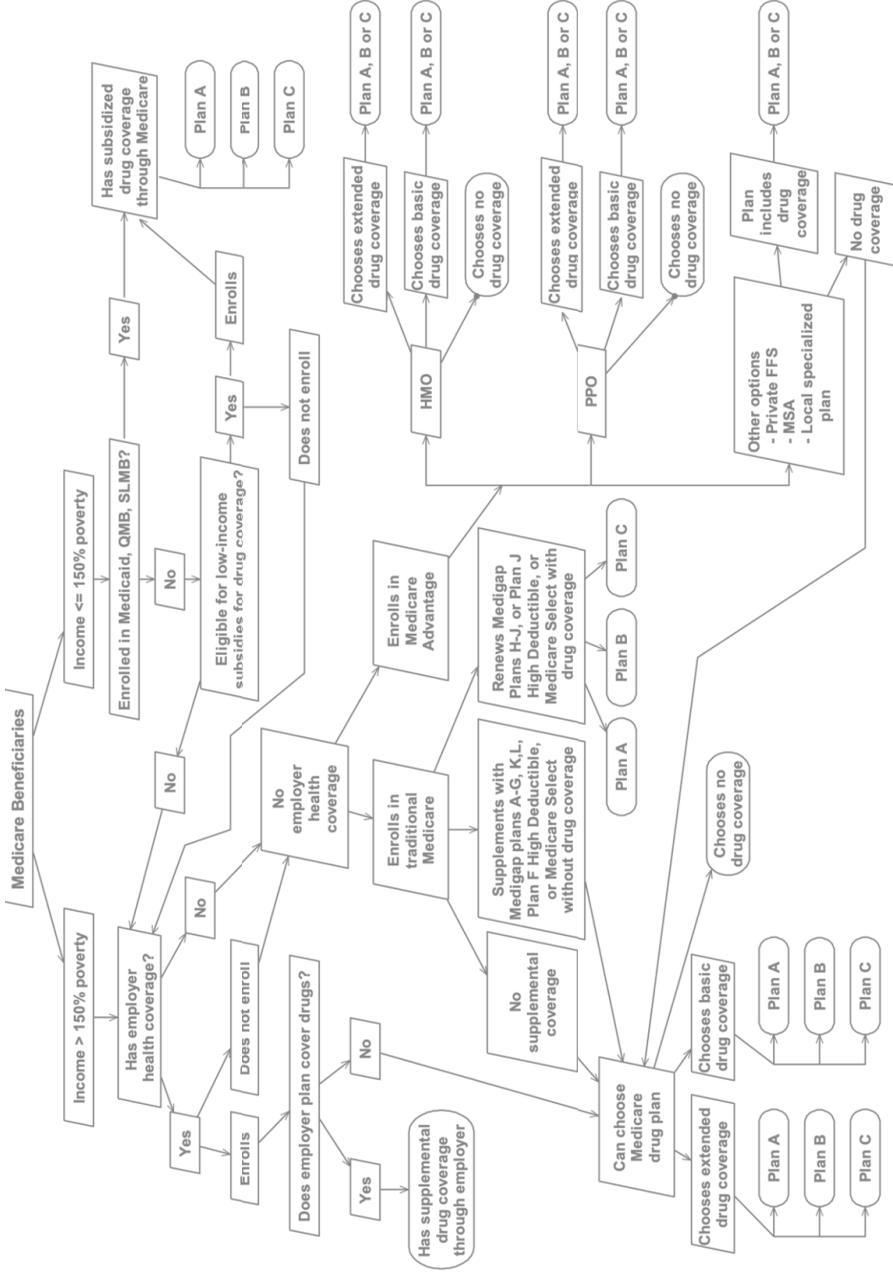
Figure 3 provides an overview of the maze of options people encounter when they enroll in Medicare, which they must deal with on an annual basis, when they either remain in their existing plans or select new coverage. Given the absence of robust regulations regarding how

plan changes are communicated to Medicare beneficiaries, users often act in ways that increase their costs and reduce their benefits. A study of Part D prescription drug plans found that only 5 percent of beneficiaries chose the cheapest plan to meet their needs (Zhou and Zhang 2012). Unsurprisingly, these burdens fall hardest on those who are disabled or have more significant health problems—including cognitive impairment.

The addition of a profit motive will in some cases align with imposing more burdens that are at odds with the best interest of the client. The privatization of poverty-based programs has been a hallmark of welfare reform movement since the 1990s. When the Aid to Families with Dependent Children was removed from the Social Security Act, it was replaced with TANF. TANF was a block grant program that gave states enormous flexibility in how it distributed those funds. States such as Florida put significant funds toward work readiness programs, requirements for people receiving any kind of cash assistance. They also chose to administer those benefits through for-profit organizations, organizations that were more likely to sanction beneficiaries for failing to obey administrative requirements (Soss, Fording, and Schram 2011). This could cost them not only their cash assistance, but also food stamp benefits and Medicaid. Strikingly, studies have found that 30 percent of sanctions were applied erroneously to people who were obeying programmatic rules (Pavetti et al. 2003).

In some cases, the perceived hassles make third parties withdraw essential support that clients need to access benefits. With the example of student loans, Goldstein and his colleagues (2023, this volume, issue 4) show that private organizations might formally have incentives to provide help to individuals and serve their best interests—by directing them to more affordable income-driven repayments—but often fail to do so because loan-service staff do not have the time to deal with the additional hassles of helping borrowers into the program. In a similar manner, the unwillingness of private actors to accept vouchers as forms of payment because of the perceived additional administrative hassle involved can make those vouchers less attractive for users also (Aiken,

Figure 3. The Medicare Maze



Source: Hanoch and Rice 2006. Reprinted with permission.

Ellen, and Reina 2023, this volume, issue 5; Barnes, Halpern-Meeke, and Hoiting 2023, this volume, issue 5; DeLuca, Katz, and Oppenheimer 2023, this volume, issue 5). Immigrants depend on doctors and police to provide essential documentation for visa processes, which the third party experiences as a burden (Moynihan, Herd, and Gerinza 2022). In such cases, the mismatch between the rewards for clients and third parties makes the client dependent on an actor who has little incentive to provide help.

Stefanie DeLuca, Lawrence Katz, and Sarah Oppenheimer (2023, this volume, issue 5) illustrate how third parties can help individuals negotiate the fragmented domain of federal housing assistance. The Creating Moves to Opportunity program was able to significantly increase the success of families using their vouchers to move to high-opportunity neighborhoods. The intensity of the help offered by housing navigators, and the multiple points where help is needed, illustrates the necessity of such support and how onerous the process looks without it.

TOWARD SIMPLE, ACCESSIBLE, AND RESPECTFUL GOVERNMENT

To reduce administrative burdens requires building alternative frameworks, a new toolbox for change and revised institutional norms. What are the normative underpinnings of such an ethic of change? We assume that the provision of public services should be designed to be simple, accessible and respectful. The introduction of burdens that impose costs on the public should be recognized and imposed only when it demonstrates a benefit that exceeds those costs. Burdens should not be used for unsanctioned goals that policymakers are unwilling to explicitly defend, such as undermining the reach of a program, or to target some groups more than others, or to use ordeals to filter out eligible recipients.

Our normative claims may, on their surface, not appear terribly controversial. They are, however, routinely violated in practice. Embedding these norms in government and making them part of practice will require new approaches to measuring citizen-state interactions. This is no easy thing. The articles in this

double issue illustrate this point by showing the wide variety of burdens that could be measured, and how they may matter in unexpected ways. As governments seek to better measure administrative burdens, they will face such practical problems (Executive Office of the President 2022). It is better to at least approximate such measurements, even if imperfect, than ignore them completely.

ADMINISTRATIVE DATA AND TECHNOLOGY CAN HELP, WITH CAVEATS

The pandemic generated a need for massive social support and laid bare the importance of administrative burdens in either facilitating or blocking access to those supports. The collapse of UI benefits pointed to the fragility of systems seemingly designed to be inaccessible. The slow response and relative failure of targeted supports such as rental relief or student lunch supports underlined the challenges of designing complex new systems with many veto players. Other aspects of the state response were more effective. Expansions to SNAP reached needy families quickly and automatically (Bitler, Hoynes, and Schanzenbach 2020), and the waiving of in-person interviews (a documented administrative burden [see Homonoff and Somerville 2021]) led to fewer program terminations (Barnes and Petry 2021). Stimulus payments based on tax data quickly reached those eligible if they were recent tax filers. The expanded CTC saw a dramatic and rapid decline in poverty (Creamer et al. 2022). If we think of the pandemic as an experiment, the lesson seems to be that the use of the tax system can offer a way to significantly reduce burdens.

The long-term shift toward benefits distributed through the tax system reinforces this impression. The growth, relatively high take-up, and political durability of the EITC seems to be a testament to the post-welfare-reform shift to using the tax system. Spending on the EITC far exceeds what was historically spent (on an annual basis) on traditional welfare. Theories as to its relatively low burden, high take-up, and generous benefits range from its link to employment to its concealment within the tax system, allowing it to slide under the political

radar (Howard 1997). Moreover, evidence indicates that the EITC promotes social inclusion and political participation (Halpern-Meekin et al. 2015; Shanks-Booth and Mettler 2019).

The use of the tax system, however, is a double-edged sword. Its concealment undermines its impact by significantly increasing learning costs and submerging the role of the government in providing benefits, thus potentially undermining support for the program (Shanks-Booth and Mettler 2019). For the EITC, private tax preparers help reduce this learning cost, often for a fee (Hoynes 2019). Additionally, the very high rate of audits of EITC recipients creates another *ex post* burden, reducing the benefits of the program (Kiel 2019).

Additionally, for those with low earnings, and disconnected from the tax system, this offers little help. Nearly two-thirds of eligible EITC beneficiaries not receiving a benefit have not filed a tax return, unaware of the benefits they are eligible to receive (Census Bureau 2013). The pandemic stimulus was sent automatically to those who had recently filed taxes, but that left out an estimated eleven million eligible families who would have to navigate the new Internal Revenue Service process for applying for the stimulus. Similarly, the expanded CTC was distributed automatically to recent filers, and those who do not file tax returns faced additional administrative burdens, making them much less likely to receive the payments. Because being a nonfiler is associated with the deepest poverty, this effectively means that generous poverty-reducing programs systematically exclude the poorest eligible individuals because they operate through the tax system. The press to maintain work requirements in a permanent expansion of the CTC would also effectively exclude many such families.

Distribution of social welfare benefits through the tax system also has implications for inequalities in terms of who bears the brunt of burdens. White and well-off Americans largely receive health insurance subsidies via the tax system with employer-based health insurance where administrative burdens are borne by government or private bureaucracies instead of beneficiaries (Ray, Herd, and Moynihan 2023). Indeed, many

Americans receiving subsidized employer-based health insurance are completely unaware they are receiving the benefit, the burdens are so low (Mettler 2011). By contrast, racially marginalized groups are more likely to rely on health insurance subsidies through the Medicaid program or the Affordable Care Act health insurance exchanges, which involve substantially higher burdens (Herd and Moynihan 2018; Michener 2018).

If the tax system offers a lesson, it is that the state can dramatically reduce burdens and deliver support quickly for most people by better using administrative data and information technology that shift the burdens away from the individual and onto the state (Herd et al. 2013). It requires not just new investments in state capacity to make such a shift possible, but also a new way of thinking about citizen-state interactions. Rather than waiting for the individual to complete an onerous process, the state reaches out to help those eligible. This is akin to changing the default in our current model of thinking about access to public benefits.

Technology offers multiple promises. It can be used to target outreach, simplify enrollment processes, and streamline the delivery of services. For example, an intervention with income-driven student loan repayment saw large increases in take-up when the default was changed from requiring individuals to go to a website to complete an application, to sending a prefilled application to beneficiaries. This required a combination of administrative data and technology, and increased take-up from 24 percent to over 60 percent (Mueller and Yannelis 2022). Technology can also be used to reduce psychological costs associated with benefits. Barnes, Halpern-Meekin, and Hoiting (2023, this volume, issue 5), examine the effect of the use of electronic debit cards in WIC, a tool previously adopted in SNAP, as a way to reduce people's sense of stigma.

The lure of technology should not lead us to overlook that it can also be a method of exclusion (Eubanks 2018). Algorithmic bias can be used in ways that target burdens toward marginalized populations. Reliance on online-only application processes is a clear way to exclude populations with low technological literacy

(Sommers et al. 2019). In short, technology is a tool that can be used for good or bad.

NUDGES ARE NOT ENOUGH TO REDUCE BURDENS; SOMETIMES HELP IS NEEDED

In some cases, informational nudges can reduce learning costs. For example, Heinrich Hock and his colleagues (2021) find that informational nudges with tailored messages increased take-up in Social Security Disability Insurance. The tailoring of such messages becomes more effective when it can draw on administrative data. Third parties that directly reach out to populations can also play such a role. Such targeted forms of nudges appear to be more successful than broad-based advertising campaigns.

Redesign of application processes can reduce both learning costs by better conveying information, and compliance costs by reducing documentation demands. For example, Code for America, a civic tech company, has reduced frictions in California SNAP application processes by reducing unnecessary steps as well as developing a mobile friendly platform for applications. In one experiment, it simplified the terminology used to describe *self-employed* (many who are self-employed do not select into this category even though it is beneficial for them to do so) and provided a self-attestation form to reduce documentation requirements. The result was to increase the claiming of larger benefits associated with self-employment status by about one-third (Moynihan et al. 2022).

Some processes are so complex that nudges are not enough: help is needed. DeLuca and her colleagues (2023, this volume, issue 5) document the role of Navigators in aiding people as they negotiate the housing vouchers, echoing previous findings on the role of health-care navigators or aid in FAFSA applications (Bettinger et al. 2012). Hoynes, Maestas, and Strand (2022) show that using attorneys at the beginning of a Social Security Disability Income application substantially reduces the wait time for benefit receipt. Pierce and Moulton (2023, this volume, issue 5) show that reduction of burdens in a foreclosure prevention program increased take-up, and especially benefited female Black and older applicants, and those fac-

ing more complex documentation requirements.

Help is a salient solution when compliance costs are high or for hard-to-reach populations who sit on the margins of society, beyond the reach of standard administrative tools. Simply sending more information in such cases can be of limited value if people cannot act on that information. For example, Elizabeth Linos and her colleagues (2022) find that multiple messages failed to increase take-up for the EITC, suggesting that those not already accessing the benefit needed more direct help. In their experiment to increase SNAP take-up among eligible older adults, Finkelstein and Notowidigdo (2019) find that adding a phone line for an enrollment specialist doubled the increase in SNAP take-up relative to a simple information treatment.

One challenge is that an intervention may help many but still increase inequality within groups. Finkelstein and Notowidigdo's (2019) SNAP study demonstrated how these inequalities play out: those most likely to take advantage of the information or offers of help tended to be those with relatively higher income and better health than the average potential claimant. This underlines not only that frictions tend to deter the most needy, but also that interventions that seek to reduce burdens may come with their own frictions that advantage better-off eligible nonparticipants.

PRACTICAL BURDEN-REDUCTION POLICY FRAMEWORKS ARE EMERGING

Although technology and administrative data provide new tools for policymakers and third parties to reduce burdens, and individual nudges or other types of interventions add to the general toolbox of solutions, the broader challenge is developing and embedding within institutions an ethic to identify and reduce administrative burdens where possible.

We see glimmers of hope on this front. The Biden administration incorporated the framework of administrative burdens into government-wide guidance to agencies, first under the auspices of an inauguration day executive order on social equity (U.S. Office of Management and Budget 2021) and later via another on trust in government—"Transforming

Federal Customer Experience and Service Delivery to Rebuild Trust in Government.” The latter declares that “Agencies must work with the Congress; the private sector and nonprofit organizations; State, local, Tribal, and territorial governments; and other partners to design experiences with the Federal Government that effectively reduce administrative burdens, simplify both public-facing and internal processes to improve efficiency, and empower the Federal workforce to solve problems” (Executive Office of the President 2021).

Although previous administrations have emphasized customer service, the Biden administration has explicitly tied customer experience not just to the experiences of people who interact with government, but also to social equity, promising to “deliver services more equitably and effectively, especially for those who have been historically underserved.”

In practical terms, the executive order institutionalizes a set of routines under which the Office of Management and Budget oversees efforts to improve people’s experience of government, reporting on their progress and setting new goals on an annual basis. Administrative burden initiatives may be championed most warmly by behavioral science nudge units in government (see, for example, UN Innovation Network 2021). This is understandable, and in no small part reflects the work of Cass Sunstein and Richard Thaler, the original *Nudge* authors, in elevating attention to what they label as “sludge” (Sunstein 2021). It also comes with some risks, as behavioral scientists in such units will naturally be inclined to look for behavioral solutions. A more hopeful possibility is that attention to administrative burdens should broaden the perspective of such units. The Biden executive order is explicit in proposing that addressing burdens means thinking not just about nudges and process redesign but also looking at underlying structural causes of burdens: “efforts to improve customer experience should include systematically identifying and resolving the root causes of customer experience challenges, regardless of whether the source of such challenges is statutory, regulatory, budgetary, technological, or process-based” (Executive Office of the President 2021).

The executive order also triggered new

agency guidance when it comes to the implementation of the Paperwork Reduction Act of 1995, which has generally not lived up to its original promise of minimizing the federal paperwork burden on individuals. The revised guidance is notable not just in urging agencies to better identify administrative burdens, and reduce them in the name of greater equity, but also expands the types of costs that government agencies should track (Executive Office of the President 2022). Paperwork Reduction Act estimates have historically focused on time spent completing forms, but the revised guidance emphasizes other types of compliance costs, such as travel time, and recognizing the role of learning and psychological costs. Agencies are told that the Office of Management and Budget will assess how well they

simplify the request for information, while ensuring the continued utility of the information they do collect;

enhance communication, navigation, and outreach tools and processes to reduce learning costs to the public;

improve information collection and submission processes to mitigate challenges that underserved and marginalized communities may disproportionately experience; and

use leading design practices to assess, evaluate, and then improve forms and information collection experiences.

Other governments could follow. Although certain conditions of the U.S. political context make the presence of burdens more likely—intense polarization, federalism, a patchwork safety net where basic public services are provided through multiple actors—the topic has been fruitfully explored in many contexts across the globe. The United Nations (UN Innovation Network 2021) recently focused on reducing burdens as a priority. In the U.S. context, state governments could fruitfully use the Biden executive order as a model to direct attention to reducing administrative burdens. One opportunity is to partner with the civic tech community as a potential partner with both an expertise in technology and an interest

in improving public services (Kennan, Soka and Sullivan 2022; Lowrey 2022).

CONCLUSION: SOCIAL SCIENCE CAN CONTINUE TO PLAY AN ESSENTIAL ROLE IN REDUCING BURDENS

Taking administrative burdens seriously means revisiting how policy is designed and how the administrative state functions. It invites the marriage of multiple skills, such as behavioral science, human-centered design, and deep policy knowledge. One example is the redesign of practices recruiting low-income students with high performance to college (Dynarski et al. 2021). An experiment at the University of Michigan provided personalized communication, which reduced both learning and psychological costs (feelings of uncertainty and inclusion) while activating support from the broader social network of families and college advisors and minimizing application hurdles. This multifaceted approach nearly doubled both applications and enrollments in the target population even without offering any new financial resources.

At a time when U.S. administrative capacity is characterized as being in decline (Klein 2022), the administrative burden agenda offers insight into how investments in capacity could improve the quality of government. Such investments can ensure that the state, rather than individuals, bear the brunt of burdens in public programs and in the long run can reduce administrative costs. For example, the administrative costs for the Social Security program are less than 1 percent of its budget, in large part because of a system that ultimately automated procedures to determine both eligibility and benefit size. This is in stark contrast to programs like SNAP, where administrative costs can run ten times as high (Geller et al. 2018). Variation is also significant across states in terms of administrative costs, which are driven, in part, by levels of administrative burden that make it more expensive to administer each case. County level of administration of SNAP, an example of federalism at play, is tightly linked to more burdens and lower take-up rates, as well as substantially higher administrative costs—24 percent higher—than state-administered programs (Geller et al. 2018).

The Biden executive order has also modeled ways social science research can help, encouraging a wide range of research techniques including “experiential data (including, as appropriate, through randomized controlled trials or other rigorous program evaluation); ethnographic research; feedback from public engagement; human-centered design methodologies such as journey mapping; operational and administrative data analysis; direct observations; examination, from a customer perspective, of how to navigate the agency’s service offerings, apply for a benefit, or comply with a requirement of the agency; observations of customer interaction with the agency’s website or application processes and tools; or observations of customer support service delivery such as activities at call centers” (Executive Office of the President 2021). For social scientists of all stripes then, this is a unique opportunity to advance research to reduce frictions and to help build the general toolbox to reduce burdens.

This double issue showcases how social science can play a role. Although across the articles we see the utility of early theory development in this domain—for example, the ability to illuminate the nature of burdens via learning, compliance, and psychological costs—they also point to the need for a variety of empirical and analytical approaches. The studies balance both qualitative and quantitative approaches. The qualitative analyses leverage in-depth interviews but also rely on observation and consumer complaints as novel sources of data. For quantitative analysis, administrative data play a central role in both diagnosing and solving problems. The lack of prior insights on burdens in many policy domains illustrates the great value of descriptive work that documents the nature and scale of problems previously overlooked.

Much of the original framing of administrative burdens examined how individuals were affected by state action. Articles in this double issue emphasize the need to broaden beyond that perspective. For example, Sackett and Lareau consider the experience of families as a unit of analysis, examining how those experiences transfer across organizations and programs (see also Heinrich et al. 2021). Other

work argues for examining general policy regimes as a unit of analysis, rather than focusing only on individual interactions, because doing so provides a fuller sense of the cumulative nature of burdens that individuals face (Moynihan, Herd, and Gerinza 2022; Pierce and Moulton 2023, this volume, issue 5). In a similar spirit, Rauscher and Burns (2023, this volume, issue 5) make the case for examining a combination of burden-reduction reforms in a policy domain rather than changes to just one part of the process, showing that combinations of reforms are more effective than any particular reform at improving infant health and prenatal care. The consistent logic is that understanding the accumulation of burdens sometimes needs a broader lens than examining discrete citizen-state interactions. Other work offers different units of analysis, which can be conceptual—for example, Sackett and Lareau’s idea of *institutional knots* as a complex blockage of institutional procedures that individuals seem unable to free themselves from—and descriptive, such as Bouek’s (2023, this volume, issue 5) attention to wait lists as a promising venue to understand how state actors manage burdens.

The translation of ideas into government practice is a fraught endeavor. It remains to be seen what will come of the Biden executive order. Whether agencies will act to reduce administrative burdens, how permanent any changes will become, how deeply they will embed themselves within agencies, and the degree to which they become mechanisms to address equity in government are all open questions. Institutionalization begets standardization, and some government employees could easily come to see burden-reduction efforts as one more administrative burden. Government-wide administrative reforms by their nature tend not to be uniformly successful, but to depend on local conditions such as organizational leadership, culture, and the nature of the task. Again, capacity matters: reforms need not just buy-in among lower-level workers, but also investment from a wide range of stakeholders, and new skillsets when it comes to measuring burdens, mapping user journeys, applying principles of human-centered design, and making better use of technology and data. The frame-

work for change, however, is in place. Social scientists have an opportunity to use their research skills as a partner. For researchers interested in this topic both an intellectual framework and a real demand from policymakers exist in a substantive way that did not a decade ago. Researchers also need to maintain a capacity to look beyond specific burden-reduction efforts, both to continue to draw attention to deeper structural causes of problems, and to engage in blue-sky thinking about how to redesign the administrative state to make it work for the people it is intended to serve.

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PART IV

Child and Family Supports



“I Used to Get WIC . . . But Then I Stopped”: How WIC Participants Perceive the Value and Burdens of Maintaining Benefits

CAROLYN BARNES, SARAH HALPERN-MEEKIN, AND
JILL HOITING

This study examines how individuals assess administrative burdens and how these views change over time within the context of the Special Supplemental Nutrition Assistance Program for Women, Infants, and Children (WIC), which provides food to pregnant and breastfeeding women and children under age five. Using interview data from the Baby's First Years: Mothers' Voices study (n = 80), we demonstrate how the circumstances of family life, shifting food needs and preferences, and the receipt of other resources shape how mothers perceive the costs and benefits of program participation. We find that mothers' perceptions of WIC's costs and benefits vary over time and contribute to program participation trajectories, so many eligible people do not participate; need alone does not drive participation decisions.

Keywords: nutrition assistance, administrative burden, social policy, poverty, inequality

The COVID-19 pandemic brought about a once-in-a-century public health crisis and economic precarity not seen since the Great Depression. Unemployment rose from a low of 3.6 percent in December 2019 to a high of 14.4 percent in April 2020 (BLS 2020a, 2020b). Record job loss led to acute economic hardship and food insecurity (Niles et al. 2020; Steimle et al. 2021; Wolfson and Leung 2020). The pandemic also

revealed the importance of safety-net programs in supporting vulnerable populations, raising questions about how well families can access critical assistance. Although scholars emphasize the role of these programs in reducing poverty and food insecurity among vulnerable households (Bitler, Hoynes, and Iselin 2020; Bitler, Hoynes, and Schanzenbach 2020), early accounts of the pandemic highlight the diffi-

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culties of accessing programs such as unemployment insurance and nutrition assistance (Ganong et al. 2022; Gassman-Pines, Ananat, and Fitz-Henley 2020). As the editors outline in the introduction of this issue, the challenges of accessing public benefits—administrative burdens—can undermine policy goals, reinforce patterns of inequality, and weaken the polity (Herd et al. 2023, this issue). Research highlights the dimensions and consequences of administrative burden, but scholars pay less attention to how individuals assess burdens or how they perceive a change in burdens over time.

Studies that do examine responses to burdens focus on how individual-level characteristics like cognitive capacity can shape program uptake (Christensen et al. 2020). This research seldom contextualizes policy targets by providing deep insights into the social and economic factors that might shape how they view burdens and their choice to persist in burdensome welfare claims. Studies that do offer such insights examine how well-resourced individuals successfully claim benefits (Masood and Nisar 2021). We know less about how these social and economic factors inform how low-income individuals perceive the costs of program participation or the value of benefits. How do program beneficiaries weigh the costs and benefits of program participation? How do these views shape patterns of program uptake over time?

We address these questions within the context of the Special Supplemental Nutrition Assistance Program for Women, Infants, and Children (WIC), which provides vouchers to purchase basic food items (such as cereal, milk, and vegetables) to pregnant and breastfeeding people and children under age five. Drawing from eighty in-depth qualitative interviews, we examine initial and continued WIC program use in light of participants’ family contexts, social supports, and other forms of economic assistance. We demonstrate how program participants perceive the value of WIC benefits and the costs of applying for and maintaining benefits during the COVID-19 pandemic. Our interviews also show the challenges of redeeming benefits using the new, electronically distributed eWIC.

In doing so, we examine whether WIC is re-

alizing its potential in addressing inequality in giving children access to a healthy start in life. If, for instance, a burdensome program design creates costs that underresourced or minoritized families are less likely to be able to bear, it is limited in achieving its programmatic mission. Further, this study sheds light on factors that shape individuals’ perceptions of administrative burden and how those burdens are weighed against potential benefits to determine program participation over time. These factors include eWIC and pandemic-induced changes to the program. Finally, these data are collected from mothers participating in a randomized controlled trial of an unconditional cash transfer—Baby’s First Years provides \$333 or \$20 monthly to mothers over the first several years of their babies’ lives. Therefore, we can observe whether and how receiving the larger versus smaller cash gift each month positions mothers to view and respond to WIC administrative burdens differently. This offers insight into how financial resources might shape perceptions of administrative burdens.

LITERATURE REVIEW

Administrative burden reflects an individual’s “onerous experiences with policy implementation” (Burden et al. 2012, 742) that occur within service-seeking bureaucratic encounters and outside conventional bureaucracies (Barnes 2021; Burden et al. 2012; Heinrich 2016; Kahn, Katz, and Gutek 1976). Scholars conceptualize administrative burden as learning, psychological, and compliance costs (Moynihan, Herd, and Harvey 2015). Applicants encounter learning costs when they are unaware of what benefit programs exist, how to apply, and how to use benefits (Barnes 2021; Moynihan, Herd, and Harvey 2015). Psychological costs, or the stigma and stress of application processes, may also discourage uptake (Baekgaard et al. 2021). Compliance costs—burdens of following program rules, providing documents for application and recertification processes, and responding to bureaucrats’ discretionary demands—can deter program participation (Moynihan, Herd, and Harvey 2015). Finally, beneficiaries may experience costs outside conventional service-seeking encounters, such as when they attempt to redeem their benefits

(Barnes 2021). Redemption costs emerge in consumer choice models of service delivery where beneficiaries must understand which goods or services are eligible and find a third-party agent who will redeem the benefit. Redemption costs occur in programs such as Medicaid (which requires beneficiaries to find health-care providers), childcare subsidy programs, the Housing Choice Voucher Program, and WIC (Barnes 2021).

Economists have long considered how those eligible for assistance programs weigh the burdens of participation against the benefits of programs and conclude that nonparticipation may reflect a “utility maximizing decision” (Moffitt 1983, 1023). This is especially the case when the stigma of participating in programs outweighs the value of benefits (Moffitt 1983). In a similar vein, economists frame burdens as ordeal mechanisms—or policy tools that screen out beneficiaries who are undeserving (Heinrich et al. 2021; Schuck and Zeckhauser 2006). From this perspective, applicants rationally respond to burdens by weighing the costs and benefits of program participation. Applicants who persist signal their true preferences and need for assistance. For these deserving applicants, the costs of claiming benefits are low.

In theory, ordeal mechanisms would ensure that assistance programs target those in need, sorting out “imposters” (Nichols and Zeckhauser 1982). Administrative burden scholars, though, critique the narrow view of ordeal mechanisms as overstating the capacity of individuals to pay the costs of laying claims on the state (Christensen et al. 2020; Heinrich et al. 2021; Masood and Nisar 2021). Accordingly, eligible policy targets do not necessarily calculate the costs and benefits of navigating burdens but may lack the capacity to understand and deal with costly bureaucratic encounters. Simply stated, burdens do not sort out imposters but do disproportionately harm vulnerable and marginalized populations (Bell et al. 2021; Brodtkin and Majmundar 2010; Heinrich et al. 2021; Nisar 2018). Empirical studies demonstrate how ordeal mechanisms can lead to bureaucratic disenfranchisement or administrative exclusion wherein individuals who are eligible for programs are deterred from claiming benefits

not because they are undeserving or prefer not to receive them but because the costs of doing so are too difficult to surmount (Brodtkin and Majmundar 2010; Heinrich et al. 2021).

To help explain these patterns of exclusion, more recent research reframes individuals as active agents in claiming benefits (Masood and Nisar 2021). Policy targets’ capacity to successfully claim benefits can depend on their cognitive capacity, administrative capital, or administrative literacy (Christensen et al. 2020; Döring 2021; Masood and Nisar 2021). Julian Christensen and colleagues (2020) point to the role of cognitive resources like executive functioning—or the capacity to plan and engage in goal-directed behavior—in bearing administrative burdens. Scarcity, poor mental and physical health, and age-related cognitive decline can erode executive function in ways that undermine individuals’ capacity to claim benefits (Christensen et al. 2020). To reduce administrative burden, individuals may strategically leverage social, cultural, and economic capital (Masood and Nisar 2021). Further, people may rely on social networks or organizations for information and strategies to deal with administrative burdens (Heinrich 2016; Nisar 2018).

This work emphasizes individual-level factors that contribute to the capacity to successfully claim benefits and organizations that facilitate individuals’ capabilities; this overlooks individuals’ processes of choosing whether to claim and maintain benefits and the social and economic circumstances that shape these decisions. Further, this research does not probe how potential participants view the value and burdens of programs over time or how these perspectives shape eligible individuals’ claiming behavior (Moffitt 1983).

For example, a mother who is eligible for the Supplemental Nutrition Assistance Program (SNAP) may forgo claiming benefits because of the instrumental support she receives from friends and family or the economic resources of other targeted programs such as the Earned Income Tax Credit. These resources may ease the necessity of her relying on SNAP and therefore alter her willingness to deal with the burdens of applying for benefits. In the case of WIC—in which the value of benefits declines over time as children age—mothers may per-

ceive the value as outweighing the costs at one point in time but later as exceeding the value and therefore exit the program. In this sense, it is not simply the burdens themselves that decrease claiming. How individuals perceive the intersection between the costs and benefits of program participation—views that may be shaped by an individual’s social and economic circumstances—can determine whether they claim benefits (Moffitt 1983). Low-income families are situated within social contexts that may inform their decisions to bear the burdens of welfare claiming (Domínguez and Watkins 2003; Henly, Danziger, and Offer 2005), and they often rely on multiple means-tested programs (Yang et al. 2019) that may shape how they perceive the value of benefits. To better understand how individuals decide to bear the burdens of claiming and maintaining benefits, we draw from in-depth qualitative interviews about how social and economic circumstances shape WIC benefit claims and program use over time.

CONTEXT

WIC is the third-largest food assistance program in the United States, serving 6.2 million families in 2020, a figure that includes nearly half of all infants (Toossi, Jones, and Hodges 2021). The program was established amid growing concerns about poverty-driven child malnutrition in the late 1960s, and the Department of Agriculture piloted small food distribution programs through select neighborhood clinics (Oliveira et al. 2002). This was formally authorized as a demonstration project in 1972. The WIC program then expanded to forty-five states and became permanent in 1974.

WIC offers a food package and nutritional education for individuals who have certain nutritional risks and meet income eligibility (Gray et al. 2019; Kline et al. 2020). Those who are pregnant, have given birth up to six months postpartum but are not breastfeeding, or are breastfeeding up to a year postpartum are eligible. Children are eligible from infancy to their fifth birthday. Individuals are eligible if

their household income falls below 185 percent of the federal poverty line or they receive Temporary Assistance to Needy Families (TANF), Medicaid, or SNAP (Kline et al. 2020). Unlike other means-tested programs, WIC does not condition eligibility on immigrant status.¹

After the initial certification, participants are eligible for a year. To maintain benefits, participants must attend quarterly appointments that assess nutritional risk, provide nutritional education, and issue benefits. WIC participants are prescribed a food package tailored to meet their household’s nutritional needs and a shopping guide that indicates WIC-participating retailers (Tiehen and Frazão 2016). Food packages specify eligible foods by brand and size. WIC participants purchase food using an electronic benefit transfer (EBT) card.

WIC enrollment and coverage rates—the percentage of the eligible population that participates in the program—have declined significantly since 2011 (Toossi, Jones, and Hodges 2021). Further, despite COVID policy waivers that made the program more accessible to beneficiaries, WIC participation in 2020 decreased by 2 percent from 6.4 million in 2019 to 6.2 million (Hall and Neuberger 2021). In addition, studies show that WIC program participation varies by the child’s age; most child participants enter the program within the first three months of life and exit after their first birthday (Gundersen 2005). Newer research suggests that mothers maintain longer-term connections with the WIC program over time through intermittent use across multiple pregnancies (Barnes, Michener, and Rains 2023). Nevertheless, some research attributes decline in program usage after infancy to changes in the food package, which eliminates formula from benefit packages after the baby turns one (Jackowitz and Tiehen 2009), meaning that the cash value of WIC benefits can decline by nearly \$130 at this point (Schanzenbach and Thorn 2020).

Other scholars point to required quarterly WIC appointments, two of which are in-person (Woelfel et al. 2004), and challenging shopping

1. WIC does not condition eligibility on immigrant status, but Carolyn Heinrich and her colleagues (2021) offer an example of discrimination when a WIC worker imposed additional compliance on a Latino man seeking benefits for his infant.

experiences (Barnes 2021) as reasons for declining enrollment. High compliance costs in the form of in-person appointments preclude long-term WIC participation. Transportation challenges and difficulties arranging appointments to accommodate work schedules can lead to program exits (Liu and Liu 2016; Panzera et al. 2017; Rosenberg, Alperen, and Chiasson 2003; Woelfel et al. 2004).

Learning how to redeem WIC benefits can also discourage participation over time. As one qualitative study of North Carolina WIC participants shows, participants struggle to identify and purchase WIC-eligible foods due to the limited portability of WIC benefits (Barnes 2021). For example, WIC participants say it is difficult to identify the WIC-approved foods—such as bread, milk, cheese, cereal, and baby food—that match their prescribed food package. Retailers add to this challenge by failing to keep WIC-approved items in stock or mislabeling foods as WIC-approved that are not. In addition, participants must learn which retailers accept WIC, stock and label WIC-eligible foods, and comply with redemption guidelines. The narrow selection of WIC-approved foods, which limits portability, and the reliance on third-party agents to redeem benefits can create redemption costs for recipients.

To modernize the program, WIC has transitioned to eWIC. The Child Nutrition and WIC Reauthorization Act of 2010 required WIC state agencies to implement EBT systems in lieu of paper vouchers by October 1, 2020. To participate in WIC, vendors must attend an annual training and are subject to audit by local WIC staff. Vendors must also keep WIC-approved foods in stock, train cashiers to process WIC purchases, and update their systems to reflect any state changes in WIC-approved foods.²

In theory, eWIC would minimize stigma, offer greater flexibility for participants, and reduce transaction times (Barnes and Riel 2022). However, research offers mixed evidence on the benefits of transitioning to an electronic benefit transfer system. On the one hand, research suggests that eWIC has improved the shopping

experience (Hanks et al. 2019; Isaacs, Shriver, and Paynter 2021; Vasan et al. 2021). Yet some qualitative research points to persistent challenges WIC participants face when trying to correctly identify and purchase WIC-approved food, even with eWIC (Li et al. 2021; McElrone, Zimmer, and Anderson Steeves 2021).

BABY'S FIRST YEARS

A key contextual consideration framing our study is that we draw our data from the Baby's First Years (BFY) intervention. BFY is the first randomized controlled trial of the effects of unconditional cash gifts on child development in the United States. Mothers participating in the study agreed to be randomly assigned to receive a large (\$333) or small (\$20) monthly cash gift for the first six years of their focal child's life, distributed on a debit card; the gift is not conditional on mothers engaging in any type of behavior, including study participation, nor are they constrained in how they may spend it. The research team worked closely with state and local agencies to ensure, to the extent possible, that the cash gift does not count against eligibility for government benefits. Given the intervention context of this study, we are able to observe whether mothers in the large- versus small-cash-gift groups display distinct WIC use patterns or describe particular trends in the administrative burdens they see connected to engaging with the WIC program. It is possible that this additional monthly cash income could make mothers in the large-gift group feel less of a need for WIC or, alternatively, they could use these additional resources to help them overcome barriers to program access (for example, transportation to WIC appointments). We explore these possibilities.

CURRENT STUDY

This study draws on the administrative burden research and empirical evidence about WIC program and retail experiences to explore how participants perceive the value and costs of program participation and how these views shape decisions to continue program receipt. Draw-

2. Some states require stores to connect their systems to the state's WIC EBT system daily to reconcile their WIC authorized products with any state-level changes to food packages (for more information, see Louisiana WIC 2022; Minnesota WIC n.d.).

ing from interviews with eighty low-income mothers, we observe families as they experience challenges with accessing, maintaining, and using the WIC program amid the transition to eWIC and the onset of a global pandemic. In addition, we observe how a randomly assigned large versus small monthly cash gift might alter mothers' interactions with and views of WIC. We explore how these factors shape mothers' perceptions of program burdens and benefits. In doing so, we address our research questions of whether and how mothers experience administrative burdens with the WIC program, how they consider both the benefits and costs of program use in deciding to access WIC services, and how these perceptions unfold over time.

METHODS

In BFY, one thousand mothers were recruited from across four metro areas—New Orleans, Omaha, New York City, and the Twin Cities—when they gave birth to the focal child, starting in 2018.³ All were over the age of eighteen and living below the federal poverty line, most were women of color, just under half of the mothers were in coresidential partnerships, and approximately one-quarter were first-time mothers. On average, they reported household incomes of about \$20,000. The cities were chosen to capture variation in demographics, cost of living, and policy environment (for more details on study design, see Noble et al. 2021).

Baby's First Years: Mother's Voices (BFY: MV) is the qualitative component of the study, in which eighty of the mothers from BFY participated. Using stratified random sampling, we recruited fifty mothers from New Orleans and thirty from the Twin Cities, which aligns with the site distribution of mothers in the larger study. Within each city, we sampled an equal number of mothers receiving each gift amount for a total of forty each in the large- and small-gift groups.

Table 1 provides the demographic charac-

teristics of the BFY: MV mothers at wave 1. Black mothers make up 66 percent of the sample, White mothers 10 percent, Hispanic mothers 9 percent, Asian mothers 4 percent, Native American mothers 1 percent, and the remaining mothers identify with multiple races or another race. BFY: MV mothers had between one and six children with a median of two; for 29 percent of mothers, the focal child was their first. At wave 1, the median age of mothers was twenty-seven and the focal child thirteen months. At the time of the first interview, 79 percent of the focal children had turned one year old, meaning that most were no longer eligible to receive formula through WIC. Only three mothers had another infant—younger than the focal child—at wave 1. At the time of the wave 1 interview, 64 percent of BFY: MV mothers were using WIC, 71 percent received SNAP, and 9 percent were enrolled in TANF.

Nationally, about two-thirds of WIC participants are at or below the federal poverty line, the cutoff used for recruitment into BFY, and about 20 percent identify as Black (Kline et al. 2020). Although the overall participation rate for all those eligible for WIC is 57 percent, among infants under one it is 98 percent, and among one-year-olds it is 61 percent (USDA 2021). The BFY: MV families, therefore, differ from the national WIC population in being more economically disadvantaged and more likely to be Black. We view the demographic makeup as a strength. Our analysis offers useful insights on most vulnerable families who have been disproportionately harmed by the COVID-19 pandemic.

DATA

For the present study, we used the first two waves of semi-structured interviews from BFY: MV. For wave 1, interviews typically lasted about one and a half hours. Most (68 percent) occurred in person between July 2019 and March 2020 and were usually completed in mothers' homes. During the COVID-19 pan-

3. Because mothers were recruited over the course of approximately a year, they are interviewed in different months, spread across that year, so that their children are a similar age at the time of the interview. For example, one mother may have been recruited in December 2018 and then completed a wave 1 interview in December 2019, whereas another may have given birth and been recruited in March 2019 and completed a wave 1 interview in April 2020.

Table 1. Demographic Characteristics of BFY, MV Mothers at Wave 1 (*N* = 80)

	<i>n</i>	Percent	Median	Minimum	Maximum
Gift amount					
Large	40	50			
Small	40	50			
Site					
New Orleans	50	63			
Twin Cities	30	38			
Age					
Mother (in years)	80		27	19	42
Focal child (in months)	80		13	10	21
Focal child > one year of age	63	79			
Race and ethnicity					
Asian	3	4			
Black	53	66			
Hispanic	7	9			
Native	1	1			
White	8	10			
Multiple	6	8			
Other	2	3			
Children					
Mother's number of children	80		2	1	6
Focal child is mother's first child	23	29			
Has another child under age one	3	4			
Sex of focal child					
Male	40	50			
Female	40	50			
Romantic partner status					
Has romantic partner	45	56			
Coresides with romantic partner	32	40			
Romantic partner is focal child's father	37	46			
Household size					
Full-time residents only	80		4	2	12
Full-time and part-time residents	80		5	2	12
Lives with an older generation	25	31			
Employment status					
Formally employed	30	38			
Not formally employed	49	61			
Program and benefit use					
SNAP	57	71			
WIC	51	64			
TANF	7	9			

Source: Authors' tabulation.

demic, we transitioned to conducting interviews by phone for the remaining wave 1 interviews completed by September 2020. All wave 2 interviews occurred by phone between July 2020 and August 2021 and typically lasted a lit-

tle over an hour. For each mother, waves 1 and 2 interviews occurred nine to twelve months apart. The interviews covered an array of topics, including mothers' childhood and educational experiences, parenthood and family life,

sources of income and types of expenses, decisions about finances as well as financial services, experiences with income support programs (including WIC), mothers' experiences of Baby's First Years, and mothers' vision for their futures and their children's. Because mothers were recruited into BFY: MV at the time of the first interview, all eighty completed an interview in the first wave, and 90 percent of mothers completed the wave 2 interview.⁴ Interviews were audiorecorded and transcribed. We use pseudonyms for all mothers and children.

EXTERNAL FACTORS: LOCATION, EWIC, AND COVID-19

Although WIC is a federal program, it varies somewhat between states. For example, although most recipients use their benefits at regular grocery stores and markets, some states, such as California, have many specialized WIC stores (McLaughlin and Martinez 2021). The two states in our study, Louisiana and Minnesota, do not have such stores.

The timeframe of our wave 1 interviews that occurred in 2019 and 2020 coincided with substantial changes in the WIC program (see figure 1). First, benefits switched from being distributed via paper vouchers to being loaded on a debit-like card through the transition to eWIC. In New Orleans, eWIC was rolled out simultaneously across the sixteen WIC offices; mothers began receiving their EBT cards in the fall of 2019 as they had their WIC visits, and vouchers were phased out by the end of that year.⁵ In the Twin Cities, vouchers were phased in during the spring of 2019, and eWIC cards were gradually disseminated as WIC visits occurred.⁶ This was accompanied by a change in how recipients could use their allocated benefits. Among the redemption costs stemming from limited portability, WIC users had needed to separate

their groceries into WIC and non-WIC items, have the cashier verify the WIC-eligibility of each item, and then turn over the paper voucher for that item. If a parent had a voucher for three gallons of milk, for example, but there were only two gallons in the store, the parent could either buy no milk, saving the voucher for another day, or give up the value of the third gallon of milk, receiving two for the price of three. This was no longer the case with eWIC.

The second major program change during the study occurred with the onset of the COVID-19 pandemic in 2020. Their daily life considerably altered, BFY: MV mothers dealt with shifting work and family responsibilities. Although not all mothers were in the workforce before the pandemic, many who were saw their jobs affected by it, temporarily or permanently losing jobs, or seeing their hours cut. In addition, they managed changes to their children's routines, which for some mothers meant less availability of family and friends to help care for children, early care and education program closures, and transitions to virtual learning for their older children. These changes have the potential to influence mothers' perceptions of WIC's benefits and costs, because those experiencing job or income loss could see WIC benefits as having more value whereas those managing the new routines of their children might find the administrative requirements more difficult to satisfy.

Initially, WIC offices in both BFY: MV locations suspended in-person visits in response to COVID-19. In New Orleans, some of the required in-person services resumed in July 2020, but in the Twin Cities, services remained remote as of October 2021 unless in-person services were requested and could be accommodated.⁷ Research has found that program modifications in response to the pandemic eased some, but not all, of the program access

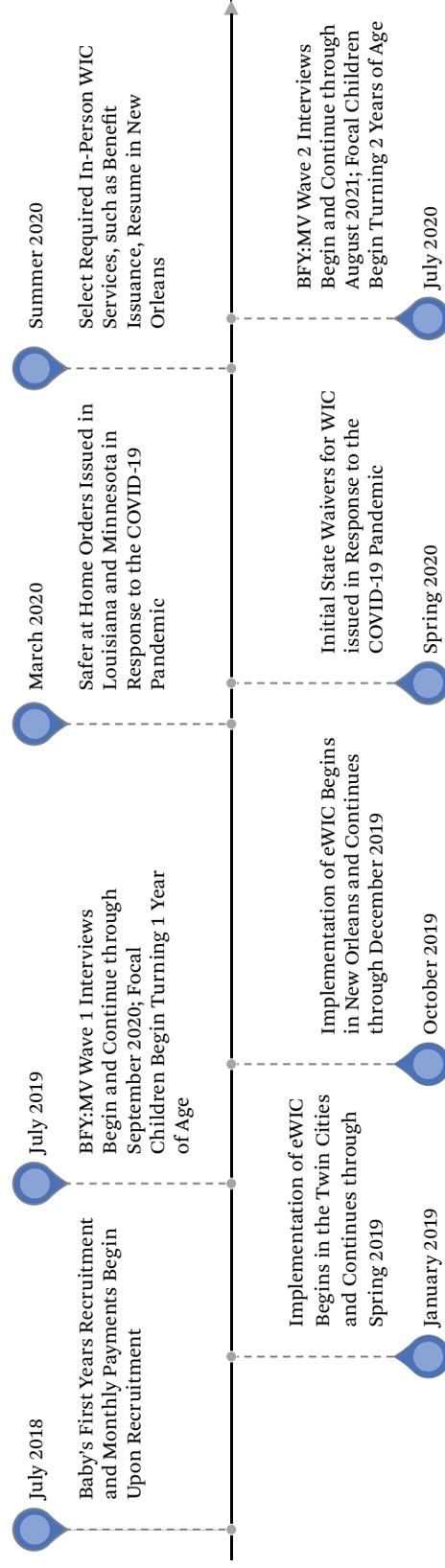
4. In light of issues with Child Protective Services, we did not attempt to recontact one of the mothers at wave 2, therefore our total possible sample size at that wave is seventy-nine.

5. Chantell Reed, New Orleans eWIC and COVID-19 related changes, telephone conversation, 2021.

6. Valeesha Halmon, Ramsey County eWIC and COVID-19 related changes, telephone conversation, 2021; Jill Wilson, Hennepin County eWIC and COVID-19 related changes, telephone conversation, 2021.

7. Halmon, telephone conversation, 2021; Reed, telephone conversation, 2021; Wilson, telephone conversation, 2021.

Figure 1. Timeline for Baby's First Years, eWIC Implementation, and COVID-19



Source: Authors' tabulation based on Halmon 2021; Moreland 2020; Reed 2021; Wilson 2021.

barriers families faced (Barnes and Petry 2021; Barnes and Riel 2022). Marianne Bitler, Hilary Hoynes, and John Iselin (2020) find that WIC is a countercyclical program, meaning that it may have helped to counteract the pandemic-induced economic downturn. In this study, we observe whether and how these experiences around eWIC and the service changes due to the pandemic shaped mothers' program perceptions and the burdens they cited in accessing or using benefits.

ANALYSIS

Because of its qualitative approach, BFY: MV allows for the possibility of discovering unanticipated themes or factors that are not included in the larger study's surveys (DeLuca et al. 2012), including our analysis of mothers' experiences with WIC. We entered all wave 1 and wave 2 transcripts into Dedoose 9.0.17 and used this qualitative software for our analysis. Because the semi-structured interviews covered many topics, we began by identifying all excerpts in which mothers discuss topics related to food security and then narrowed to those specific to WIC. Because we did not ask specifically about administrative burdens with WIC, we draw on the narratives mothers spontaneously offered during the interviews.

We used both inductive and deductive approaches to our coding. We structured our coding hierarchy to capture mothers' perceptions of WIC as high cost, low cost, high benefit, or low benefit. Within each of these codes, we developed subcodes. We drew on the literature regarding administrative burden to organize the category of WIC's high costs, creating subcodes for learning costs, psychological costs, and compliance costs (Herd and Moynihan 2018). Within learning costs, we also specified when mothers cited redemption costs (Barnes 2021). We developed the subcodes for the categories of high benefit, low benefit, and low cost based on the perspectives shared by mothers in the interviews. Under low cost, we in-

cluded subcodes regarding convenience, including those created by eWIC and remote services. We also included a subcode indicating an absence of noted costs related to WIC participation. The subcodes for WIC being high benefit included valuing the baby formula it covered, seeing value in WIC-provided food and drinks, saving money by using WIC, lack of other supports or resources (making WIC resources relatively more important), WIC staff, education provided by WIC, and eligibility for other programs and services that comes with WIC receipt. We also included a subcode indicating whether there was an absence of benefit critique in a mother's narrative about WIC. Last, subcodes related to the low-benefit perspective included the loss of highly valued formula, the limited value of WIC-provided food and drink, and the limited value of WIC's child health and nutrition education.

We applied our coding scheme to identify all costs and benefits described by each mother at both waves. That is, it was mothers' perspectives of what was costly and what was beneficial that drove our determinations, as opposed to our sense of what would be burdensome versus useful. For each mother at each wave, we were then able to determine the combination of mothers' views as high benefit–high cost, high benefit–low cost, low benefit–high cost, or low benefit–low cost based on their descriptions of WIC's benefits and costs. Although many mothers viewed the program uniformly (for example, all the views they expressed could be described as high cost), some described both high- and low-cost or both high- and low-benefit perspectives. For example, a mother may describe the ease of using eWIC (low cost) and the difficulty of getting WIC staff on the phone to ask a question about eligibility (high cost), or a mother may highly value the formula WIC provides (high benefit) but report that her children will not eat the other foods it offers (low benefit).⁸ We consider these nuances throughout our coding process. We also noted

8. When we categorize mothers' perspectives as high benefit–low cost, and so on, we do so primarily based on whether they reported any high benefits or costs; if they reported both high- and low-cost or benefit perspectives, we considered what category best captured their general sentiment about the program and categorized their views accordingly.

Table 2. Distribution of Benefit and Cost Categories

	Wave 1 (N = 80) n (Percent)	Wave 2 (N = 71) n (Percent)
High benefit	56 (70)	32 (45)
Low benefit	17 (21)	18 (25)
High cost	23 (29)	27 (38)
Low cost	50 (63)	28 (39)

Source: Authors' tabulation.

Note: Due to missing data and an inability to categorize some mothers' responses, benefit and cost totals at each wave do not add up to 100 percent. We report percentages based on the full sample at each interview wave to avoid inflating estimates. If we were to remove cases from the sample size for which we are missing values, we would find 77 percent of mothers are in the high-benefit category, 23 percent in the low-benefit category, 32 percent in the high cost category, and 68 percent in the low cost category at wave 1. At wave 2, we would find 64 percent of mothers are in the high-benefit category, 36 percent in the low-benefit category, 49 percent in the high-cost category, and 51 percent in the low-cost category.

parents' WIC receipt status at each wave and categorized their participation as continuing from wave 1 to wave 2, ceasing between wave 1 and wave 2, starting between wave 1 and wave 2, or having not participated at both waves 1 and 2.

Two researchers independently coded the excerpts for twenty-two of the eighty mothers and then worked together with a third study team member to resolve any differences in coding. This allowed for the development of coding reliability and for analytic discussion of the meaning of the codes and themes. Among the remaining cases, any questions of coding or categorization that arose were resolved through consensus by a pair from the research team. After completing our coding and categorization, we examined the patterns and themes that emerged by cost and benefit pairings and among the participation types. We investigated differences between the mothers receiving the large BFY gift amount and small-gift amount to account for the role of the unconditional cash transfer in our sample; we also examined differences between groups by site, given that the experience with the WIC program could vary by state.

RESULTS

We categorized mothers' accounts of their experiences with WIC as high- versus low-cost and high- versus low-benefit to understand how the intersection of these cost and benefit experiences relate to mothers' decisions to participate in WIC. Here, we first present the types of experiences that characterized reports. Table 2 presents the distribution of benefit and cost categories, which we discuss in depth. At least 91 percent of mothers indicated current or previous WIC receipt, meaning that nearly all had some familiarity with it.⁹ They followed four trajectories of WIC participation from the wave 1 to the wave 2 interviews (see table 3): continued participation (twenty-six, or 33 percent); did not participate at either wave (nineteen, or 24 percent); stopped participating (did at wave 1 but not at wave 2; fifteen, or 19 percent); or started participating (did not at wave 1 but began by wave 2; two, or 3 percent). We then explore how these views of costs and benefits varied by mothers' patterns of participation over time, which sheds light on how the relative balance of perceived costs and benefits shapes program participation.

9. Of the eighty mothers, seventy-three reported current or previous WIC receipt and four that they had no experience with WIC. We were unable to discern whether the remaining three had any experience. To avoid overestimating, we calculate the overall rate of previous or current participation using the full sample of eighty mothers; the rate may therefore be an underestimate.

Table 3. WIC Participation over Time

	<i>n</i>	Percent
Continued participation from wave 1 to wave 2	26	33
Ceased participation between wave 1 to wave 2	15	19
Started participation between wave 1 to wave 2	2	3
No participation at wave 1 or wave 2	19	24

Source: Authors’ tabulation.

Note: *N* = 80. Due to missing data and an inability to categorize some mothers’ responses, participation categories do not add to 100 percent. We report percentages based on the full sample size to avoid overestimation. If we were to remove cases from the sample size for which we are missing values, we would find that 42 percent of mothers continued participation, 24 percent ceased participation, three percent started participation, and 31 percent did not participate at either wave. For seventeen additional mothers, we know WIC participation status at wave 1 but not wave 2. Ten (13 percent of mothers) participated and seven (9 percent of mothers) did not. One additional mother participated at wave 2, but her WIC participation status at wave 1 is unknown.

HIGH BENEFIT

Among the eighty mothers, fifty-six (70 percent) described WIC in ways we characterized as high benefit at wave 1, when their children were about a year old; by wave 2, only thirty-two (45 percent) did.¹⁰ The most common reasons mothers saw benefit in the WIC program, especially before the children turned one (the age at which WIC stops covering formula), were the food and drinks it provided. Further, mothers appreciated saving money when they were able to stretch scarce resources to cover other costs, given that WIC was taking care of certain basic food costs for their children; some valued WIC because they lacked other resources, such as their SNAP benefits, making WIC a key part of their budgets. Although less common, some mothers highlighted the nutrition education WIC provided, that participation made them eligible for other programs or discounts (such as free zoo entry), or the helpfulness and friendliness of the WIC staff. Here we illustrate those themes most common among mothers who described seeing high benefit to WIC participation.

The first time we spoke to her, Trinity, a White mother of four, including baby Sebastian, from the Twin Cities, told us, “I do have

WIC. So, that also is a huge life saver for, like, the formula. Now he’s on regular milk, but we’ll get three gallons for Sebastian, three gallons for [my other young son], and my older boys go through the gallons pretty quick.” Trinity actively manages her children’s food consumption and relies on WIC to ensure that, even when they run short on fruits and vegetables each month, she’s still able to provide the basics. “So, you know, I try to space it out or tell [the boys], you know, no cereal at night. . . . I always make sure that there’s milk, eggs, bread, butter, all the basics, and noodles.” For Trinity, WIC is essential to making sure her kids—not just those under five—are fed throughout the month.

During our wave 2 interview, when we asked about WIC, Eve, a Hmong mother of one who lives in the Twin Cities and at the time was pregnant with her second child, shared a similar perspective on the important role WIC played as a key household resource that shored up her food budget. She quickly pulled out her phone and opened the WIC app (a feature of eWIC) to show us how she uses WIC-approved foods to feed her child. “So currently for Eli and I, we get cheese, we get tofu, we get eggs, we get breakfast cereal, peanut butter, peas or beans,

10. Because of missing data and the inability to categorize some responses, benefit and cost totals at each wave do not add to 100 percent. We report percentages based on the full sample at each interview wave to avoid potential overestimates (for more detail, see table 2).

and whole grain items, fresh fruits, fresh or frozen fruits and vegetables, yogurt. And, of course, Eli, he is lacto [lactose intolerant], so we get soymilk for [him] and then we get regular milk for me. And juice as well.” Eve noted that using all of this food requires some creativity on her part, because her two-year-old is “really picky.” “So it is kind of hard to give him all these items at once. But he really does love his bread. He likes to eat cheese, but it has to be incorporated like in the bread. Like, for example, like a grilled cheese. . . . So it just really depends on his mood some days, and then everything else he just intakes it other days, but he loves to switch his vegetables.” Even with her son’s food tastes changing from day to day, she says of WIC, “It’s working great.”

Mothers who lacked alternative resources and whose children’s food preferences matched the items WIC provided valued these benefits as well as the money they saved and the holes in their budgets WIC filled. WIC was a core element of their food budgets, fulfilling the program’s stated mission of “providing nutritious foods” to “safeguard the health” of participating families.

LOW BENEFIT

The proportion of mothers who reported limited benefits to WIC participation remained stable from wave 1 to wave 2, seventeen (21 percent) and eighteen (25 percent), respectively.¹¹ Here, the temporal nature of how mothers weighed the costs and benefits of the WIC program emerged. Mothers saw WIC as offering low benefits for one of two reasons: they no longer received the one thing from WIC that they highly valued (formula) or they saw limited value in the foods and drinks WIC provided.

At a baby’s first birthday, WIC stops covering the costs of formula, which some mothers referred to as milk or baby milk. This marked

a turning point in many mothers’ relationships with WIC. As Cassandra, a Black mother of one in New Orleans, explained at our wave 2 interview: “The food that they gave me, my baby really wasn’t eating. . . . The main reason why I were getting WIC was because I needed the milk. Milk assistance. So, you know, once she stopped using the milk, I really didn’t need the WIC [any] more.” The many mothers like Cassandra are correct in a financial sense, in that the value of what mothers typically described being prescribed in formula (seven cans per month x \$20 per can = \$140, according to several mothers’ estimates) far outstripped the value of what they were prescribed in cows’ milk (three gallons per month x \$3.70 per gallon = \$11.10).¹² The financial gains to WIC participation therefore objectively change with the transition from formula to milk (see also Schanzenbach and Thorn 2020).

When mothers cited issues with specific foods, it was often not being prescribed the kind of milk they preferred (such as 1 percent rather than whole or cows’ milk rather than soy) or being limited to kinds of baby food or cereal no one in their family wanted to eat (such as cereal with low or no sugar). More simply, the foods prescribed by the program did not match participants’ preferences. When we spoke with Patrice, a Black mother of five, including toddler Demyah, in New Orleans, at wave 2, she told us that the WIC food package did not match what her family wanted to eat. “I stopped getting WIC. I mean, they don’t give us what the kids eat, and it just like pile up and pile up. And I feel like other people could get that. They give us, like, one percent milk, and they give us, like, for the cereal. But the kids don’t really eat cereal. The only cereal they probably will eat is the Cheerios, and they don’t really eat that. . . . Demyah don’t drink cow-base milk. I let her drink SILK soy milk.” Some mothers described being able to get other

11. The reason the proportion of mothers describing WIC as high benefit declines from waves 1 to 2 without a comparable increase over time in those describing it as low benefit is that we have less information about mothers’ views at wave 2 due to attrition; interviewers inadvertently skipped this question; or mothers did not say enough for us to characterize their views, such as indicating that they did not receive WIC but not elaborating.

12. These are the estimated value to mothers of the WIC-prescribed formula versus milk. The cost to the government is distinct, however, since WIC pays a far lower rate for formula as negotiated by states, often paying only 15 percent of the market cost (Oliveira 2011).

kinds of milk alternatives (soy, almond) through WIC. The state WIC programs in Louisiana and Minnesota allow for the purchase of soy milk, for example. However, some mothers were under the impression that they would only be offered cow milk through WIC and so chose to forgo WIC and purchase their chosen milk alternative themselves. Others saw limited value in the products to which WIC gave them access, leading them to see limited benefits to program participation.

HIGH COST

The proportion of mothers who saw WIC participation as costly was fairly consistent between waves 1 and 2, twenty-three (29 percent) and twenty-seven (38 percent), respectively. By far, the most common reason mothers described participation as costly was compliance costs, such as having to manage appointments—remembering to keep them, finding time in a busy schedule for them, difficulty scheduling them around work or other obligations, arranging transportation to them, and bringing children to the appointments—and dealing with any necessary forms and documents. Issues around appointments were the primary cost cited. In addition, some mothers described learning costs, either learning about the program (pre-enrollment) or learning how to navigate the program (after enrollment), or psychological costs of the program, the stress or stigma of interacting with unhelpful staff.

Among these potential burdens, as discussed, compliance costs emerged most frequently. For example, Jaelyn, a Black mother with six children in the Twin Cities, said that her husband was opposed to getting help from any assistance programs, so Jaelyn juggled a lot on limited resources. They did receive WIC for some of their now-older children. For their youngest, however, making it to the appointments proved to be too much: "I never got it with Hassan though. I don't know, I missed ap-

pointment. And then, I don't know, something came up. [The WIC staff member] always called me, 'You come into the WIC appointment? You coming?' Something always keep coming up. I never got the WIC with Hassan." For Jaelyn, complying with the required frequency of WIC appointments was too difficult to continue participation; that is, the compliance costs were too high. Similarly, the first time we met Simone, a Black mother of one in New Orleans, she told us that finding time in her schedule to get to the WIC office has stood in the way of her ongoing participation. "I was getting WIC. I can always go and still get it or whatever. I had just been so busy with work. Like with me working Monday through Friday, I haven't had a chance to get up there and get it." As it was for Jaelyn, the requirements to go to the WIC office while juggling work and childcare raised the compliance costs above what Simone was willing to pay. The ease of being able to "always go and still get it," which Simone described, changed with the onset of the COVID-19 pandemic, however.

Multiple mothers cited a concern over in-person appointments during the pandemic as a reason they had stopped using WIC. Especially because they had to bring their children with them as part of the WIC appointments, they saw the health risks of going to a WIC appointment as outweighing the benefits.¹³ When we met her at wave 1, Tori, a White mother of three in New Orleans, told us she had stopped receiving WIC because she could not make her appointments.

I have issues missing my WIC appointments, apparently, since this pandemic started, especially. I've missed two appointments, and because we don't have a car and just the way, like, one time it was raining. I don't even remember what happened the second time. We weren't able to make it. So, it just kind of sucks, but otherwise, other than having to go

13. In response to the pandemic, WIC offices in both New Orleans and the Twin Cities transitioned to remote services after their state's receipt of a federal waiver. In July 2020, New Orleans WIC offices returned to some in-person services, including brief education and benefit issuance (Reed 2021). In the Twin Cities, Hennepin County continued remote services into the fall of 2021 (Wilson, telephone conversation, 2021), whereas over the course of the pandemic, Ramsey County began offering some in-person services at the client's request and curbside pickup of eWIC cards (Halmon 2021).

there physically and have the appointment, it would be good if it was other than that . . . if we could do applications online and/or video phone call like we can for SNAP.

“That sucks,” she concluded about in-person appointments. “That sucks without a car.” The combination of transportation issues and the risks of in-person meetings during a pandemic made Tori feel that the costs to WIC participation were high.

For many, redemption costs remained a significant hurdle even with the switch to eWIC. For some mothers, eWIC compounded the burdens of redeeming benefits given that they found navigating the program more difficult than before. At wave 1, when we asked about her experiences with WIC, Alisha, a Black mother of three in New Orleans, said, “Well, it was okay, but now that they upgraded to a credit card, and you can only go to like grocery stores like Walmart and [grocery store], it’s just too much. You have to walk around the store. You have to see what’s for WIC and what’s not for WIC. It’s a lot. It’s a lot.” Other mothers confirmed that fewer stores accepted their benefits after the transition to eWIC. When we met her at wave 2, Serena, a Black mother of three in New Orleans, told us she had received WIC in the past but was not currently because of the problems she faced trying to redeem those benefits with the eWIC card: “I think with this card thing they have made it complicated. Less places take it now, so it just really made it bad.”

At wave 2, Yasmin, a Black mother of three in New Orleans, carefully walked us through what the process of using WIC was like before and after the switch to eWIC:

When you get to the register, you tell them that you have a WIC. Alright? They got to call somebody over, see that if they don’t come or if they don’t answer the radio, it’s hard, you got to stand there, and the people behind you are like ‘What’s going on?’ I keep apologizing, ‘I’m so sorry, but I have a WIC, you know. I am really sorry,’ and someone finally comes over, they check the card, and then what you should have in your basket pops up on their screen, so if you don’t have what’s in their basket you

pay the difference if that’s what you really want. . . . Nothing is labeled in the aisle for WIC. It’s just a whole—you got to ask somebody. . . . “Is this available on WIC?” They don’t know. “Let me call somebody.” I’m just like, “Oh god, please. Let it be over.” So, I mean it’s a good thing to have. But the process you have to go through to get it, it’s horrible.

Yasmin compared this experience with what it was like before the switch to eWIC, when her paper vouchers were accompanied by a sheet of paper listing what she was eligible to receive. “Well, before the process changed, all you had to do was sign the back of it. Look at a sheet of paper. . . . I love being a visual person. I can’t do things, you know, offhand. I can’t read it once, and then get it. I need to look at this. . . . That way I know exactly what I go get, I know exactly what I need. . . . They made it way more complicated, and a lot longer.”

As Yasmin explained, eWIC increased redemption costs for her—the time and effort of redeeming the benefits, learning what she could and could not purchase, and dealing with the stigma she felt attached to WIC use. Even though the eWIC card may be less distinct from the payment methods non-WIC customers are using, the process of involving store staff and holding up the line made Yasmin feel even more singled out than she did when using paper vouchers. The challenges of finding a store that accepted WIC or finding the WIC-approved items led some mothers to leave the program. Others, who continued to receive WIC, stopped redeeming all of their benefits because figuring out what they could select was too much effort.

As Nakeisha, a Black mother of two in New Orleans, told us at wave 2: “That WIC is something else. I can’t deal with them. I only get the main stuff that I know because half of the stuff on there they be giving you, you bring it to the counter, [and you’re told] that’s not the right one. So, I just want to get the main stuff that I know that I can get.” Nakeisha avoided some of the redemption and learning costs of using WIC, but at the price of forgone food assistance for her family. Like Nakeisha, other mothers described paying out of pocket for foods WIC

would have covered in order to avoid the costs of WIC participation.

LOW COST

Mothers were quite likely to describe WIC participation as low cost at wave 1, fifty (63 percent) doing so; by wave 2, only twenty-eight (39 percent) did.¹⁴ In expressing this low-cost perspective, mothers often had little to say about their experiences. Some, however, used words such as *easy* to describe the process of enrolling in and using WIC. Some noted the convenience of new features, including eWIC and the pandemic-induced switch to phone appointments from in-person ones.

For example, Jayla, a Black mother of one in New Orleans, is fairly typical of this group; for her, participation was not particularly notable at our wave 1 interview, either in what they received or the challenges in navigating the program. She said, “I get WIC for Mila . . . We just get like milk, juice, stuff like that, yogurt, things like that. . . . It’s just good, no issues.” At wave 2, her story was the same: “I like WIC, too. I don’t have no problems with them either.”

Some mothers viewed the switch to eWIC as increasing redemption costs, as described. Others felt differently. At wave 1, Alexandra, a Black mother of one in the Twin Cities, described the eWIC card as “pretty easy to use.” Her husband, in contrast, did not feel comfortable so instead used their BFY card when he was at the store buying baby food. The plus side of the card, for some mothers, came in the flexibility eWIC offered in redeeming their benefits. Whereas before they needed to redeem their voucher for all of a prescribed food item at once, such as getting all three prescribed gallons of milk or getting fewer and forgoing the remainder for the month, eWIC allowed them to purchase items as needed. As Imani, a Black mother of four in New Orleans, told us at wave 1, “With the vouchers, you have to get everything at one time. With the card, you can stretch it out throughout the month. . . . I think

the card is much better.” At wave 2, Chantel shared a similar sentiment—“I don’t have to get everything at one time”—and pointed out how much easier it was for her to manage the food benefits for all three of her children on WIC with everything loaded on one card rather than spread across three separate sets of vouchers.

Because the switch to eWIC for some mothers came shortly before the pandemic led to widespread shutdowns, some mothers saw eWIC as easing the burdens of having to go into the WIC office. As Soledad, a Latina mother of three, living in the Twin Cities, told us at wave 2, “[WIC is] much better because now they handed [you] a card, and you no longer have to go to their office. You schedule appointments through the phone . . . much better.” As we see here, the response to the eWIC transition among mothers was far from uniform, with some feeling it eased the costs of program use while others saw it as increasing them substantially.

We use these perspectives, of WIC as high-versus low-benefit and high- versus low-cost, to understand the participation patterns we see over time, from wave 1 to wave 2.

CONTINUED PARTICIPATION

Of the eighty mothers, only a minority—twenty-six (33 percent)—continued their WIC participation from wave 1 through wave 2.¹⁵ At wave 1, most of these mothers (sixteen, 62 percent of those who continued participation) described WIC as high benefit and low cost; in this group, four described WIC as high benefit–high cost and four described it as low benefit–low cost. Mothers in this group tended to describe the benefit application process as easy, and they valued the food WIC provided, particularly before their child was one, when WIC was helping cover the costs of formula. Even among the mothers who continued participating in WIC across interview waves, several noted that their families did not eat some of

14. See previous footnote for some reasons this declined without a comparable increase in the proportion viewing it as high cost.

15. Due to missing data and an inability to categorize some mothers’ responses, participation categories do not add to 100 percent. We report percentages based on the full sample of eighty mothers to avoid potential overestimates (for detail, see table 3).

what WIC covered, and so they did not redeem all of their benefits; they ended up with those foods piling up at home, or they shared them with other family members. The difference in moms' enthusiasm for WIC based on whether they had an infant for whom it was covering formula was notable.

NO PARTICIPATION

Of the eighty mothers, nineteen (24 percent) did not receive WIC at either wave. Many in this group had participated in WIC in the past but were just not receiving it at the times of the interviews. At wave 1, these mothers (seven, 37 percent) most commonly described WIC as high benefit–high cost; the rest were evenly spread across the other perspectives. Mothers in this group had often received WIC but stopped doing so by the time of our wave 1 interview, sometimes because of compliance challenges or the lower value they saw WIC having after their babies were one. Other mothers, however, had not received WIC for the focal child, even if they had done so with older children; making it to appointments was often a key difficulty. Some mothers had stopped using WIC when they no longer received formula—some even described their WIC benefits as stopping at that point, as opposed to saying they chose to stop receiving WIC. As Michelle, a Black mother of three in New Orleans, reported, “They said he aged out.” Tori, introduced earlier, told us that it began to matter less if they were receiving WIC once her son aged out of formula because “those are the most important days to have it.” In recounting when they had last received WIC, mothers often pegged it to the time when their youngest child was still drinking formula, emphasizing what a key turning point in their relationship with the WIC program the end of formula coverage represents.

CEASED PARTICIPATION

Of the eighty mothers, fifteen (19 percent) were using WIC at wave 1 but stopped by wave 2. We saw their views of the program evolve over time. At wave 1, a majority (ten, or 67 percent) described WIC as high benefit–low cost. By wave 2, however, none did so: about a third described

it as high benefit–high cost and a third as low benefit–low cost. It would seem that for some of these mothers, the costs or benefits of participation changed, leading them to decide that taking part in WIC was no longer worthwhile. Two factors stood out. First, some mothers found that the milk WIC prescribed did not match their children's or their preferences and thus WIC no longer met their needs; alternatively, they had needed help affording formula—one mother described WIC as “milk assistance”—but once their children switched to milk, they could more easily cover these costs with their earned income and SNAP benefits. Second, with the beginning of the pandemic, as WIC—and so many other offices—struggled to transition to a virtual world, mothers' relationships with the program were disrupted; many simply never went back. As Jade, a Black mother of two in New Orleans, told us, “I have not received WIC since, in months . . . because the pandemic started and they wasn't accepting anymore, anymore appointments. So, when I did actually make the appointment, it was basically for . . . [my toddler] to go to the appointment, but they never gave me a date or a time. They was just like come in whenever you could, but then, you know, my baby couldn't go in . . . so I just never went.” Other mothers similarly recounted finding the WIC offices closed or requiring their child's in-person attendance during the pandemic, which they did not feel comfortable with, and so their participation in WIC ended because they could not or did not comply with program requirements.

BEGAN PARTICIPATION

Of the eighty mothers, two (3 percent) were not using WIC at wave 1 but had begun doing so by wave 2. Because so few people had this experience, we cannot identify patterns in their program perspectives. Like some in the no participation group, the mothers who appear to have begun participation at wave 2 had actually received WIC previously but were not at the time of the wave 1 interviews. This underlines the sometimes unstable nature of parents' experiences with WIC, cycling on and off benefits, particularly when their receipt is interrupted by a missed appointment.

VARIATION BY SITE AND OTHER RESOURCES

At wave 1, just under two-thirds of mothers in both sites reported WIC participation. Likewise, their perspectives on costs and benefits of participation were similarly distributed within each site, with the exception of a higher likelihood in New Orleans of seeing WIC as low benefit–low cost (18 percent of mothers, relative to 10 percent in the Twin Cities).¹⁶

Because this study was conducted in the context of an intervention, attending to whether and how the additional income received through BFY by the large-gift group (\$333 per month) relative to the small-gift group (\$20 per month) is related to use and views of WIC's administrative burdens is important. At wave 1, we see no differences in WIC receipt between groups: just under two-thirds of mothers in both gift groups reported that they received WIC for the focal child. At wave 2, despite a substantial decline in WIC receipt overall, differences by BFY gift group remain small, 38 percent of large-gift group mothers and 41 percent of small-gift group mothers reporting receipt. Additionally, the perspectives mothers shared on the benefits and costs of WIC participation were distributed similarly within each group. This would suggest that the additional dollars from BFY do not alleviate the need for WIC or change the perception of the costs and benefits associated with WIC participation. Given that all BFY mothers were below the federal poverty line at the start of the study, and that the WIC program reaches up to 185 percent of the federal poverty line, this finding may not be surprising.

In addition, we can examine how mothers' participation in another common nutrition assistance program, SNAP, is related to their WIC participation. At wave 1, three-quarters of those not receiving WIC were on SNAP, as were two-thirds of those on WIC. This pattern continued at wave 2: mothers were more likely than not to be on SNAP regardless of WIC participation. Mothers therefore do not appear to be uniformly substituting SNAP for WIC. Despite

their receipt of these other resources, mothers who received SNAP were likely to describe WIC as a high-benefit or a low-cost program at wave 1. These trends continued at wave 2, suggesting that, for many mothers, WIC and SNAP are more complements than substitutes.

DISCUSSION

We demonstrate how the circumstances of family life, shifting food preferences, and the receipt of other resources shape WIC-eligible mothers' perceptions of the costs and benefits of program participation. We find evidence that mothers' perceptions vary over time and, in some ways, shape program participation trajectories; need alone does not drive participation decisions. The additional income from BFY does not appear to shift the costs and benefits of WIC that mothers randomly assigned to the larger versus smaller gift groups perceive. Many emphasized the high compliance and redemption costs, showing some ways in which structural factors drive perceived costs. However, the high value of WIC benefits for infants made program participation worth the burdens of accessing and redeeming benefits. We find that perceptions of the value of the WIC program shifted as children aged out of formula and WIC-approved foods no longer matched families' preferences. As the value of benefits declined, the high compliance and redemption costs discouraged many mothers from staying on the program. Child age and the resources that mothers had to navigate program participation costs, therefore, worked to sort who gained and who withdrew from WIC benefits. The burdens appear to be disproportionately affecting women who cannot afford the costs of participation. These findings have suggestive implications not only for WIC but also for other programs with high redemption costs, such as Medicaid, childcare subsidies, and Housing Choice Vouchers (Barnes 2021).

This points to two key takeaways from this study. First, for WIC participation, formula is a singularly important benefit among the set of foods currently offered. Second, costs matter as

16. Because the interviewers in Minnesota were disproportionately likely not to gather information on WIC status at wave 2, we do not offer site comparisons focused on wave 2.

much, if not more than, benefits in shaping prospective mothers' willingness to participate, especially after they lose formula benefits. Because we follow families over a year, we see how perceptions of the relative mix of costs and benefits evolve over time. Further, we see that when participation was disrupted, families may not return, suggesting some degree of path dependency in program participation patterns. Some WIC offices struggled to maintain connections with or serve families at the onset of the pandemic; even though they were able to adapt their service models to provide services virtually, the initial disruptions had longer-term implications for some families, who did not return to seek benefits.

As studies demonstrate, the evidence that eWIC reduced administrative burden is mixed (Leone et al. 2021; McElrone, Zimmer, and Anderson Steeves 2021). For some mothers, eWIC increased the burden as stores and mothers alike struggled with the adjustment. This experience, though, was not universal: some mothers saw the new program delivery system as cutting their redemption costs. Even so, eWIC was insufficient in addressing the main burdens parents cited as shaping their program experiences—compliance costs. Many of the parents interviewed lacked the time and transportation resources to make it to in-person appointments. It therefore follows that eWIC does not appear to address a primary administrative burden facing potential and current program participants.

This study, of course, is not without limitations. First, we capture perceptions of administrative burdens that may arise from implementation failures rather than burdensome structural program features. We lack qualitative data from the staff's perspective to understand whether some of WIC participants' burdensome experiences stem from policy implementation failures. Further, as is true of most qualitative studies, the results are not generalizable; the intention of this study is to examine the variety of perspectives and experiences mothers describe with WIC. Our sample size limits our ability to make comparisons among our respondents. Whether the frequency of these perceptions varies substantially within other populations or locations is

an open question. Because families are WIC-eligible up to 185 percent of the poverty line, but our sample was recruited from mothers who were below 100 percent of the poverty line, we are missing the perspective of those who have relatively higher incomes. Second, we only follow mothers over a limited time around the birth of one of their children; we see that experiences change over time and may be different with each child, depending on a mother's circumstances, and so the points of view mothers express about the WIC program should be expected to vary over time. Third, the COVID-19 pandemic disrupted many aspects of life, including those germane to families' participation in WIC, such as their willingness to ride public transportation to get to appointments and whether WIC offices were open and parents willing to take their children in for appointments. Although some mothers were dissuaded by these obstacles, others may have continued their participation longer than they otherwise would, as the costs associated with attending in-person appointments were eased for a period of time during the pandemic with the option for phone appointments. Looking to the future, the facility with which social service providers pivot their service delivery will be key to maintaining access to program participation as climate change and associated extreme weather events grow in their disruptive impact.

We see three take-away public policy messages from this study. First, those eligible for a program may become more or less willing to tackle the burdens of participation depending on the benefits of doing so; neither these costs nor these benefits are static for participants. For example, with the loss of formula benefits once children turned one, many mothers were no longer willing to tackle the same set of costs. That is, the administrative burdens of program participation must be assessed in a relative way. Second, eWIC created and eased costs of program usage for different mothers, depending on how easy both they and the stores around them found the new system to use. More scaffolding to ease transitions for both individuals and the stores through which they redeem benefits could be useful. Third, policymakers ought to reflect on which admin-

istrative burdens families feel the weight of the most and which eWIC actually resolves. We see a mismatch between these, which suggests room for further program refinements to address the burdens families perceive as most costly. For example, WIC offices now have experience administering the program without quarterly in-person visits, which suggests an opportunity to reflect on whether and how often in-person visits should be required in the future, since these are a barrier mothers see to their ongoing participation. Given how many mothers participate in both SNAP and WIC, for example, programs could work around administrative silos to allow families to complete their requirements for both programs simultaneously in one visit.¹⁷ This could raise the benefits of going to a WIC appointment, given that SNAP benefits are substantial for many families, an average of \$392 per month for households with children (Center on Budget and Policy Priorities 2019), and lower the costs, because it would limit the number of appointments parents need to juggle. However, this ease of access must be weighed against the potential loss of relationships with WIC staff that some parents build and value through their WIC appointments (Barnes, Michener, and Rains 2023).

Using the WIC program as a case, this study advances our understanding of how lower-income families in the United States assess and make decisions in light of the administrative burdens of participating in means-tested assistance programs. These decisions are based on their implicit assessment of the relative balance of the costs and benefits of program participation; notably, however, the compliance and redemption costs that weighed most heavily varied across mothers. Inequities across mothers, such as their facility in navigating the eWIC app, their access to personal transportation, employment schedules, and the other resources on which they had to draw (such as SNAP), changed their perceptions of the costs and benefits attached to program participation. Further, mothers whose children's food

preferences aligned with WIC's food packages receive greater benefits from the program: WIC food is only valuable insofar as children are willing to eat it.

The intention of the WIC program is to boost mothers' and children's adequate nutritional intake. Although the weight of the evidence suggests that WIC is effective at achieving this goal and in promoting positive child development (Currie and Rossin-Slater 2020), opportunities to reach more children for a longer span in the early childhood period by addressing the administrative burdens mothers must navigate to access these supports are clear. Because WIC participation rates are well below eligibility rates, room for WIC's impact to grow on the healthy development of economically disadvantaged children is substantial. WIC shows potential as a tool for giving children access to a more equal start in life, but currently administrative burdens are impeding its ability to fully deliver on this promise.

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17. In some places, like New Orleans, initial eligibility determinations are already coordinated across assistance programs, but the recertification process is not. Further, as mothers described, SNAP program appointments were fully remote, making demands for in-person appointments in WIC more exceptional.

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Administrative Burdens and Economic Insecurity Among Black, Latino, and White Families



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This study investigates how administrative burdens influence differential receipt of income transfers after a family member loses a job. Using the panel component of the Current Population Survey from 1990 through 2019, we find that administrative burdens have increased in the Temporary Assistance for Needy Families and Unemployment Insurance programs but declined for the Supplemental Nutrition Assistance Program. These administrative burden effects generally contribute to lower income replacement rates for Black and Latino families experiencing job loss relative to White families, though results are sensitive to adjustments for benefit underreporting. Moreover, states with higher shares of White residents have smaller administrative burden effects, on average. Reducing administrative burdens in income transfer programs would likely reduce racial-ethnic inequalities in economic insecurity.

Keywords: administrative burdens, welfare state, inequality, poverty

For low-income families, or families experiencing an income shock, government income support plays an important role in allowing the family to meet its basic needs. Evidence suggests, however, that benefits coverage among eligible families is relatively low across income support programs (Elder and Powers 2006; Kroft 2008; Moynihan, Herd, and Harvey 2015; East and Simon 2020). Moreover, access to income support differs across individuals of different races and ethnicities and across time, even among those who are eligible to receive the benefit. This study investigates how enrollment in income transfers varies by race-

ethnicity and across time to understand how differential program coverage affects families' economic well-being.

Specifically, we use the panel component of the U.S. Current Population Survey's Annual Social and Economic Supplement (CPS ASEC) from 1990 through 2019 to investigate receipt of income transfers after a member of a low-income family unit loses a job, and whether benefit receipt after job loss varies by race-ethnicity. We focus primarily on benefit receipt among families who appear to be eligible to receive the given income transfer, isolating (to the extent possible) challenges related to ben-

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efit access among the eligible from the regulations that affect eligibility itself.¹ We present findings with and without adjustments for potential underreporting of income transfers in the CPS ASEC using TRIM3, as we elaborate on later.

We focus on benefit receipt after job loss for two main reasons: first, job loss is a critical event that sharply reduces household income (East and Simon 2020; Couch and Placzek 2010), challenging the ability of low-income families to meet basic needs; moreover, job loss is an experience that often prompts eligibility for income transfer programs or, if a family is already enrolled, an increase in benefit levels. For example, an individual from a low-income household who loses a job could potentially be eligible for unemployment insurance (UI) benefits, Supplemental Nutrition Assistance Program (SNAP) benefits, or cash assistance from Temporary Assistance for Needy Families (TANF). In reality, however, many eligible individuals do not receive the income support they are entitled to receive, and benefits take-up differs significantly by program type (Kroft 2008; Sommers et al. 2012). We view the share of households that do not receive the benefits they are eligible for in a given state or year as a holistic measure of that program's administrative burden. Rather than focusing on first-order burdens, such as how one policy or procedure affects benefit access, we measure the aggregate consequences of bundles of first-order burdens that affect program participation among the eligible. This conceptualization of administrative burden is broader than other uses of the construct, including those used in this double issue, but we believe it is instructive to take benefit receipt among eligible households as the default expectation and policy aspiration. In turn, we view the share of eligible households not receiving a benefit as a measure of administrative burden, be it due to policy design, implementation failures, or lack of citizen education.

Means-tested transfers, in particular, face lower take-up rates relative to programs such

as Social Security and Medicare, which have near-perfect take-up rates among the eligible population (Moynihan, Herd, and Harvey 2015). Receipt of UI, for example, is far from universal. Outside periods of major economic downturn, fewer than half of unemployed workers receive UI, and both those with less education and minoritized populations are significantly less likely to receive this benefit than highly educated persons and White adults (Gould-Werth and Schaefer 2012; Nichols and Simms 2012; Skandalis, Marinescu, and Massenkoff 2022). One key reason for uneven benefits take-up is that means-tested programs require greater effort on behalf of public officials and claimants to confirm an individual's eligibility. In fact, perceived ineligibility is the most cited reason for failure to file for and ultimately receive UI (Gould-Werth and Schaefer 2012; Vroman 2009; Wandner and Stettner 2000).

Although research suggests that administrative burdens are consequential for whether citizens successfully submit claims (Herd 2015; Herd et al. 2013; Heinrich 2018; Nisar 2018; 2018b), few studies holistically investigate how administrative burdens contribute to income replacement rates among low-income families experiencing a major income shock. Detailing where and when programs achieve near-universal coverage of eligible households is critical to identifying what works, just as mapping where and when benefit take-up falls short is key to identifying what does not work. Analyzing these trends across places and over time enables us to monitor program performance and determine where to target resources or develop new outreach strategies to ensure vulnerable families receive the benefits they need and deserve. Given the central role of state and local governments in implementing these programs, our holistic measure can also serve as a report card for their performance in connecting eligible families to benefits. At the same time, investigating how administrative burdens broadly shape economic outcomes may yield new insights into the function of the U.S. welfare state. Additionally, exploring

1. We take into account, for example, that recent immigrants are often categorically ineligible for social transfers. Their lack of benefit receipt would be attributable to eligibility rules rather than barriers to access among the eligible, which is our primary focus.

racial-ethnic differences in receipt of assistance may aid us in accounting for the persistently higher levels of poverty among Black and Latino families than among White families, as well as inform strategies to reduce such inequalities.

Our study therefore aims to answer two primary research questions. First, when a member of a low-income family loses a job, to what extent can they access the government income support they are eligible to receive? How does this vary across time and by race-ethnicity? Second, what effects do administrative burdens have on the economic well-being of low-income families? How does this vary across time and by race-ethnicity?

BACKGROUND

A robust body of research shows that income support programs have beneficial short- and long-term effects on low-income families, especially those with children. This study focuses on benefits receipt among households encountering financial difficulties, with or without minors. However, households that include children are more likely to be low income than those without (Shrider et al. 2021) and to be eligible beneficiaries of income transfer programs. Indeed, to qualify for TANF, households must have at least one child under the age of eighteen present (U.S. Department of Health and Human Services 2021), and two-thirds of SNAP benefits go to families with children (Center on Budget and Policy Priorities 2017). Recipients of UI, in contrast, are somewhat less likely to live in a household with a child: 44 percent of UI recipients coreside with an individual under the age of eighteen (Carey et al. 2021). Because most families receiving benefits include children, much of the research examining the effects of these programs focus on such households.

Income support programs are influential in reducing poverty in the short run and often result in improvements in both health and economic productivity in the long run (Hoynes and Schanzenbach 2018). In 2015, SNAP benefits alone lifted nearly four million children out of poverty (Hoynes and Schanzenbach 2018; Wheaton and Tran 2018), and the collective value of income transfers and tax credits re-

moved 7.4 million in 2017 (Hoynes and Schanzenbach 2018; Shapiro and Trisi 2017). Additionally, SNAP access during childhood is related to better health outcomes during adulthood (Hoynes, Schanzenbach, and Almond 2016).

The impact of TANF on family well-being is relatively modest, in part because federal funding has been held at its original 1996 level (Floyd, Pavetti, and Schott 2017). However, research suggests that sizable increases in total income from higher TANF (\$1,000) payments are associated with significant increases in student achievement (Duncan, Morris, and Rodrigues 2011; Hoynes and Schanzenbach 2018) and TANF coverage may improve a family's daily routine and decrease the likelihood that a child repeats a grade (Wang 2015). During the Great Recession, about 40 percent of households that included a person receiving UI benefits would have been considered poor before accounting for this income transfer (Gabe and Whittaker 2012). During the COVID-19 pandemic, UI benefits played a pivotal role in reducing hardship among the unemployed and stimulating economic activity (Falk et al. 2021).

Given the importance of income support programs for family and child well-being, racial and ethnic differences in benefit receipt may perpetuate inequalities in economic opportunity. Studies show that unequal access to resources, particularly among families with children, contributes to disparities in health, education, material hardship, and subjective well-being (Duncan, Morris, and Rodrigues 2011; National Academies of Sciences, Engineering, and Medicine 2019; O'Brien et al. 2020; Cross 2020). Black and Latino families in the United States have long faced unequal access to resources relative to White families. Although labor-market inequalities influence many of these disparities in income, the decentralization of the American welfare state also tends to perpetuate racial-ethnic inequalities (Michener 2018; Soss et al. 2008; Hardy and Logan 2020; Herd and Moynihan 2018). Black families are more likely to live in states that have not expanded Medicaid, have lower minimum wages, do not offer supplements to the federal EITC, spend less on TANF cash as-

sistance, and offer less-generous UI benefits (Michener 2018).

ADMINISTRATIVE BURDENS IN THE AMERICAN WELFARE STATE

Administrative burdens are commonly classified into three broad categories: learning costs, psychological costs, and compliance costs (Moynihan, Herd, and Harvey 2015). A learning cost refers to the responsibility imposed on citizens to learn about a program, ascertain whether they are eligible, and understand the nature of benefits and how to access services. Psychological costs are incurred when citizens have to deal with the stigma associated with participating in an unpopular program; they may also involve a loss of autonomy and increased stress as a result of navigating program procedures. Compliance costs include the completion of applications for enrollment or reenrollment and responding to or avoiding discretionary bureaucratic requests.

Typically, researchers focus on specific instances of administrative burdens: paperwork, extra hurdles for applying to benefits, excessive bureaucratic discretion, and so on. In this study, we adopt a broader conceptualization of administrative burdens: all factors that contribute to the lack of benefit receipt among individuals who are eligible for the given benefit. We are, in effect, capturing the aggregate consequences of a series of first-order burdens that affect program participation among the eligible. This broader conceptualization deviates from typical administrative burden analyses that focus on a single burden or a single program; instead, it adopts as a counterfactual that all families eligible to receive a given benefit should receive the benefit. This counterfactual is not without precedent. Data from European countries find near-universal coverage of unemployment benefits in Germany, Finland, Austria, and Belgium (Thévenot, Maestri, and Maquet 2016). The UK Universal Credit automatically updates recipients' benefit values when their earnings change (Coady et al. 2021);

in Estonia, thirteen national data registries connect to efficiently identify eligible recipients for unemployment benefits and to distribute benefits (e-Estonia 2018; Helmes 2020). We acknowledge that many factors drive the lack of take-up of benefits—from stigma to low information about a given benefit to burdensome application processes. In viewing the counterfactual as a near-automatic distribution of benefits, however, we can conceptualize each of these broadly as administrative burdens and can investigate how such burdens shape access to resources throughout the past thirty years.²

Notably, our full-coverage counterfactual does not attribute residual lack of coverage—after accounting for specific administrative burdens—to behavioral differences overall or between subgroups. Historically, the United States has prevented some subgroups from gaining equal access to income support programs through a series of policies and practices that give rise to racially discriminatory outcomes. For example, TANF's predecessor, Aid to Families with Dependent Children (AFDC), restricted benefit receipt for African Americans to certain times of the year to guarantee the supply of Black labor for agriculture and domestic work (Floyd et al. 2021). Thus potential behavioral differences, such as whether to apply for benefits, can be conditioned by program and policy design. Adopting a broader conceptualization of administrative burdens addresses this potential endogeneity issue and accounts for racist policies and practices within the welfare state that may obstruct program participation. It also allows us to benchmark trends across time and place and offers a tool that can be carried forward in future research to continue monitoring progress using publicly available data.

WHY FOCUS ON JOB LOSS?

A primary goal of income support programs is to protect families from negative economic shocks (Figinski 2017). In this analysis, we examine receipt of income support from SNAP,

2. One may argue that applicants who forgo an application process to receive benefits, perhaps due to low potential benefit value relative to cost of applying, should not be considered as facing an administrative burden. Our perspective argues the contrary: all costs that inhibit benefit receipt among eligible individuals can be conceptualized as a burden. In an auto-enrollment counterfactual, such costs would not exist.

TANF, or UI after a person in a low-income family experiences job loss.³ Job loss is relatively common: in a typical (that is, nonrecession) year, between 1 and 2 percent of workers are laid off, low-income and less-educated workers at even higher rates.⁴ Past analyses reveal how job loss drives an immediate decline in individual earnings and overall household income (Couch and Placzek 2010; East and Simon 2020). For example, Chloe East and David Simon (2020) find that no-fault job loss reduces individual earnings by between 49 and 66 percent over the first six months; after one year, monthly earnings are still 38 percent lower than the month before the layoff event, and negative effects on earnings are traceable more than five years beyond the event (see Couch, Jolly, and Placzek 2011).

Focusing on job loss in this analysis is a particularly useful scope condition for understanding administrative burdens: as an income shock, it marks a critical moment when low-income families will generally turn to income transfer programs for support. Relative to other events that may trigger eligibility for income support programs—namely, family transitions such as childbirth, divorce, family member death—job loss is more common and arguably more straightforward to measure in national surveys.

Research has used job loss as a trigger event to examine the dynamics of the U.S. social safety net. For example, East and Simon (2020)

use data from the Survey of Income and Program Participation (SIPP) to examine receipt of major public assistance programs following an involuntary layoff. Consistent with the literature (Rothstein and Valletta 2017), they find that UI is the most substantial source of income support for individuals who lose their jobs, followed by SNAP benefits; they find other income support programs, notably TANF, provide less help (see also Bitler, Hoynes, and Kuka 2017). Whereas East and Simon (2020) primarily focus on earnings replacement after job loss across the income distribution, this study focuses on the consequences of uneven access to income transfers among families that are likely eligible to receive the benefits, focusing on racial-ethnic and over-time differences.⁵

DATA AND METHODS

We use the panel component of the CPS ASEC from 1990 to 2019.⁶ Households in the CPS ASEC sampling frame are sampled for four consecutive months, then are not interviewed for the next eight months, and then are then included in the CPS again for the next four months. As a result, roughly half the respondents in one year's CPS ASEC are also featured in the subsequent year's CPS ASEC. The panel component of the ASEC is not often used (for recent exceptions, see Hardy, Smeeding, and Ziliak 2018; Lundberg 2021) but provides a powerful source of data to measure year-on-year

3. Marianne Bitler, Hilary Hoynes, and Elira Kuka (2017) find that Earned Income Tax Credit (EITC) can mitigate income losses for married couples with children; however, given the CPS ASEC assumes perfect coverage of the EITC, and that the benefit does not mitigate income losses for most recipients, we do not investigate the program in this study.

4. This is according to the Job Openings and Labor Turnover Survey of the Bureau of Labor Statistics. Given adults who experience job loss often live with other individuals in a family unit, the total number of individuals affected by job loss within the family unit is, by definition, notably larger.

5. Two related differences between their study and ours include, first, our use of the CPS ASEC rather than SIPP, which allows us to cover a longer time period, to incorporate TRIM3 and identify eligibility for different income transfers, and to adjust for benefit underreporting; and, second, their focus on individuals experiencing a no-fault layoff versus our broader focus on examining income and benefits coverage of families with a working-age adult that transitions from employment to nonemployment for any reason (other than retirement or enrollment in education).

6. Starting in 1990 is necessary because certain income variables necessary for this analysis, such as income received from unemployment benefits, are not available in earlier years. As discussed later, much of our analysis focuses on 1993 through 2017, as we apply benefit adjustments from TRIM3, which are only available during this framework.

transitions in employment, poverty, income, benefit receipt, and more. Moreover, it features larger sample sizes and more comprehensive income data relative to other sources of the panel data, such as the SIPP or PSID.

We first limit our sample to respondents who are observed in consecutive years within the ASEC. Although we use data from both years in which each respondent is observed, we evaluate all outcomes in the second of the two years. This limits our sample to some forty thousand individuals per year who are observed in the ASEC for their second year. Following common practice in the inequality and poverty literature, we focus on outcomes at the family unit level (more specifically, the Supplemental Poverty Measure unit, which is equivalent to the household in more than 95 percent of cases). We refer to the family unit as family regardless of whether it includes children.

Our analytical focus is on families with a working-age adult that transition from employment in year one to nonemployment in year two. Our definition of nonemployment includes working-age adults who are jobless and actively looking for work (unemployed) but also those who are jobless and do not report to be looking for work (nonemployed).⁷ We do not include as nonemployed any working-age adults who are retired or in education. Because we are interested in lower-income families (those more likely to seek government assistance in the event of job loss), we limit the sample to families with a pretax, pretransfer income that is below half the national median in the second year in which they are observed. The rationale is that wealthier families experiencing job loss are less likely to face economic insecurity relative to lower-income families that experience job loss. In figures A.2 through A.5, we also present results for the full sample without cutting based on pretax-transfer incomes.

We focus on pretax-transfer incomes in the second year (after job loss), rather than the first year, in our primary analysis given that the pretax-transfer incomes after job loss are more indicative of the family's potential need for income transfers. Focusing on pre-job-loss income may capture some families who are better off in the year after job loss if another family member increases work intensity or receives higher wages, and also leads to the possibility of missing families who experience the largest losses in income and might be eligible for higher levels of benefit receipt. We present results that cut the sample based on incomes in the year before job loss in figure A.4.

As to outcomes of interest, among the low-income families with a working-age adult who experience job loss, we are primarily interested in two sets of outcomes: the lack of receipt of transfer benefits among those who appear to be eligible to receive the transfers, and the replacement rate of transfers. We discuss these in turn.

First, we measure our primary proxy of *administrative burdens*: nonreceipt of SNAP, TANF, and UI transfers among families eligible to receive the benefits in the year in which a family member becomes jobless. These are binary indicators of whether at least one member of the family receives a positive value of the given benefit in the second year (regardless of whether the family also received the benefit in the year before job loss). As we document in figure A.1, most families who receive SNAP, TANF, or UI benefits in the year of job loss did not receive the given benefit in the year before job loss.⁸

We measure *eligibility* for SNAP and TANF benefits using indicators from Urban Institute's TRIM3 simulations, which takes into account immigration status, family structure and size, state policy rules, and more when identifying likely eligibility.⁹ TRIM3 does not provide

7. Trends and racial differences are comparable if we limit the sample to those who transition to unemployed and active in the labor market.

8. If a family receives transfer benefits in both years, but the value of the transfers does not increase after experiencing job loss, then the given transfer will not contribute to our calculation of the replacement rate.

9. Our measure of likely eligibility is based on observables within the CPS ASEC and does not encompass all dimensions of eligibility. For example, some states impose drug tests for TANF benefit eligibility; we cannot

an estimate of eligibility for UI benefits. Thus, we create a proxy of UI eligibility manually in the ASEC based on whether the newly jobless individual worked at least twenty-six weeks in the prior year; worked at least ten hours per week, on average, in the prior year; and reports being unemployed (jobless and actively searching for work).

Our second indicator captures the consequences of administrative burdens. We measure the replacement rate of income transfers as the share of lost market earnings that are compensated by increases in transfer benefits for a family experiencing job loss. For example, if a family loses \$20,000 in annual earnings due to lost wages after job loss, but subsequently receives \$5,000 in additional social assistance (beyond what the family received in the year prior to job loss), the replacement rate is 25 percent. We bottom-code replacement rates at zero (no negative values) and top-code at 100 percent (perfect replacement). Of course, the U.S. legal maximum replacement rate is typically below perfect replacement. For example, state laws usually cap the UI maximum benefit amount between 70 and 80 percent of prior income, just as SNAP recipients are expected to spend 30 percent of their resources on food, limiting the benefit amount to no more than 70 percent of their income (D.C. Department of Human Services 2022; Lacoma 2022). Under these restrictions, replacement rates between 70 and 80 percent likely represent a best-case scenario.

To assess the broader contribution of administrative burdens to economic insecurity, we also use the indicators of program eligibility and benefit receipt to produce a counterfactual replacement rate if all eligible individuals received the benefits they are eligible to receive. To calculate this, we first compute the total

sum of transfers that a family unit would receive if it indeed received all SNAP, UI, and TANF benefits for which it is eligible. We then substitute this value for the observed value of benefit receipt. We then construct the counterfactual replacement rate using these substituted benefit values.¹⁰

We supplement our primary results with three sensitivity tests. First, we address the benefit underreporting of TANF and SNAP in the CPS ASEC. Benefit underreporting will likely lead us to underestimate replacement rates. If benefit underreporting has intensified from the 1990s onward, or varies meaningfully by race-ethnicity, it may alter our conclusions about trends and disparities in benefit access after job loss. To address this issue, we present a set of results in which we adjust for underreporting in TANF and SNAP using Urban Institute's TRIM3 simulations.¹¹ In short, TRIM3 uses information about each individual and household in the CPS ASEC to predict the value of benefits that a recipient is likely eligible to receive. The simulations use individual or household data on race, ethnicity, immigration status, marital status, household structure, state of residence, income, state-level policy rules, and more to estimate program eligibility. One limitation of TRIM3 is that the data are currently available only from 1993 through 2017; thus we limit many of our analyses to these years. A second limitation is that TRIM3's benefit simulations may allocate SNAP and TANF benefits too strongly (relative to administrative records) toward households at the bottom of the income distribution (Stevens, Fox, and Heggeness 2018). As a result, the use of TRIM3 could provide an overoptimistic scenario of TANF and SNAP benefit receipt among our focal populations. We therefore present results both with and without TRIM3 benefit ad-

identify whether certain individuals in the ASEC may have failed this test and therefore may be falsely identified as eligible to receive TANF in our estimates. This is a limitation of our measure of eligibility.

10. Given that our measurement of replacement rates captures only changes in income transfers from the prior year in the numerator, it may penalize families that already received the maximum value of SNAP benefits in the year prior to unemployment, and thus saw no change in SNAP benefits after job loss.

11. TRIM3 has been used in several recent studies on poverty (Falk 2015) and is also used extensively in the recent National Academies of Sciences, Engineering, and Medicine (2019) report on reducing child poverty.

justments and evaluate our conclusions in either scenario.

Second, it could be that different population characteristics across states, rather than administrative burdens, drive incomplete access to benefits. To test this possibility, we also estimate our counterfactual replacement rates after reweighting each state-year’s population to have the same population characteristics as the United States as a whole. Specifically, we equalize the mean levels of high school graduation, college graduation, family structure, employment rates, gender, household size, and number of children of each state to match the mean values among all states (see figures A.2 through A.5).

Third, it could be that variation in states’ benefit levels, rather than differential access, could drive any differences we observe in counterfactual replacement rates. Given that SNAP benefits do not vary across states (other than Alaska and Hawaii), and that UI benefits largely vary depending on an individual’s prior earnings, it is primarily policy-driven variation in TANF benefit levels that threaten our analysis.

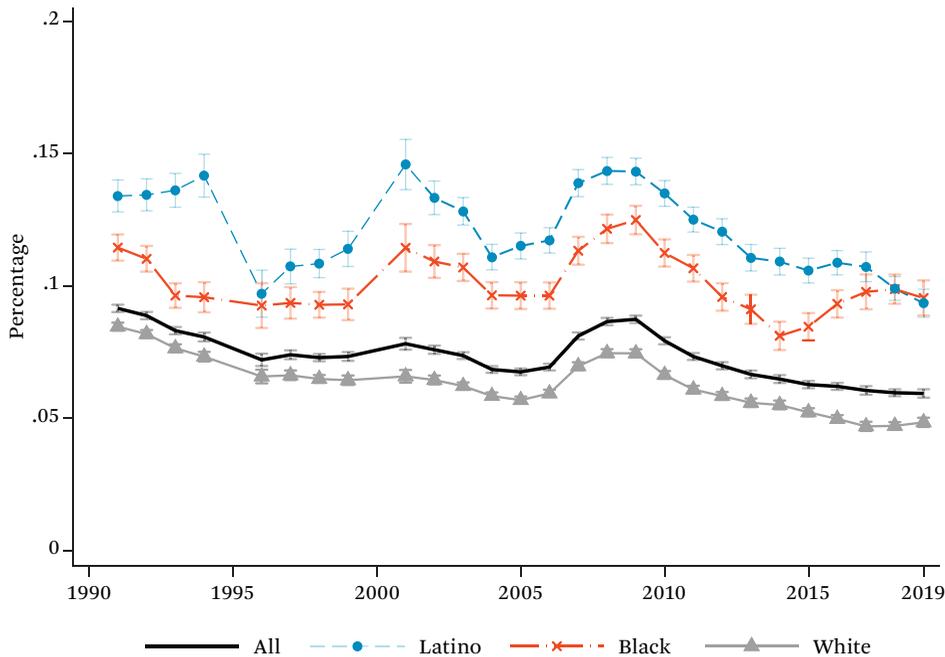
Thus, we also produce estimates of counterfactual replacement rates after equalizing all states’ TANF benefit levels (see figures A.2 through A.5).

FINDINGS

Figure 1 presents the share of all family units in the United States with at least one member experiencing a transition from employment to nonemployment by race-ethnicity and year. In 1990, just under 10 percent of all families had one member transition from being employed in 1989 to not employed in 1990. For Whites, the rate was slightly lower than the national mean (around 8 percent); for Blacks and Latinos, it was higher (around 12 percent and 14.5 percent, respectively).

In the following two decades, the share of families experiencing job loss steadily declined until the onset of the Great Recession, then spiked around 2008 and 2009 before steadily declining again. In 2010, the share of families experiencing job loss from the prior year was just above 5 percent. Across all years, however, racial-ethnic differences persist. Blacks and La-

Figure 1. Family Units with at Least One Employment to Nonemployment Transition from Previous Year



Source: Authors’ calculations from the U.S. Current Population Survey (Flood et al. 2022).

Note: Error bars represent 95 percent confidence intervals.

tinians consistently face notably higher rates of family job loss relative to Whites. By 2019, in fact, the share of Blacks or Latinos experiencing family job loss was around double the rate of that of Whites, around 10 percent to 5 percent.

ADMINISTRATIVE BURDEN EFFECT

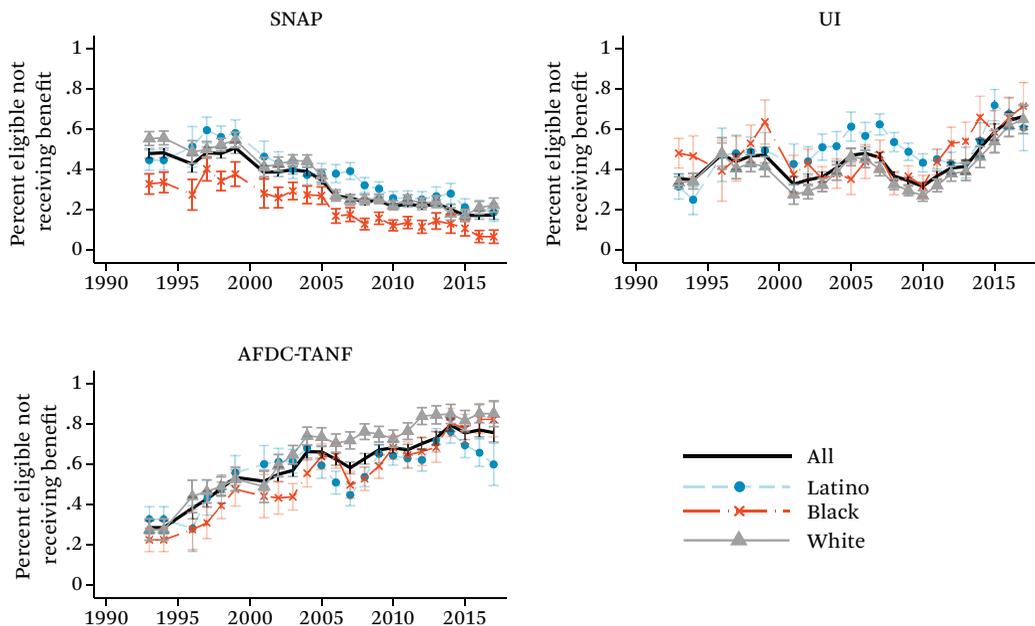
Figure 2 provides descriptive trends in the nonparticipation of SNAP, UI, and AFDC-TANF benefit receipt among low-income families who experience joblessness and are likely eligible to receive the given benefit. The upper left panel shows that SNAP benefits, the only of these transfers primarily administered at the federal level, have low and declining rates of nonparticipation among likely eligible families experiencing job loss. In 1990, an estimated 45 percent of likely eligible SNAP families experiencing job loss did not receive the benefit, though this figure fell to around 20 percent in 2019. In many years, Blacks see lower than average nonparticipation rates of SNAP benefits among the eligible, whereas Latinos often see

higher than average. This may reflect the “chilling effects” of immigration enforcement that disproportionately affect Latino families (Friedman and Venkataramani 2021). That is, many Latino immigrants who are eligible to receive benefits may forgo them to avoid real or perceived negative immigration consequences for themselves or those close to them who may be undocumented (Friedman and Venkataramani 2021; Watson 2014).

The upper right panel of figure 2, in contrast, suggests higher nonparticipation rates among the eligible for UI benefits. In 1990, UI missed an estimated 40 percent of likely eligible families experiencing job loss. By 2019, this had increased to about 60 percent. Across most years, Black and Latino families experiencing job loss are less likely to receive UI benefits despite likely being eligible (see also Kuka and Stuart 2021).

The lower left panel shows steep declines in access for AFDC-TANF benefit receipt. In 1990, cash assistance from AFDC missed an estimated 20 percent of likely eligible families ex-

Figure 2. Administrative Burden Effect



Source: Authors' calculations from the US. Current Population Survey (Flood et al. 2022).

Note: Rates of benefit nonparticipation among low-income families who experience joblessness and are likely eligible to receive the given benefit.

perceiving job loss, outperforming SNAP and UI. In 2019, however, nonparticipation climbed to 80 percent of likely eligible families experiencing job loss. Differences across race-ethnicity are not generally statistically significant in most years, though White families have lower rates of take-up in more recent years.

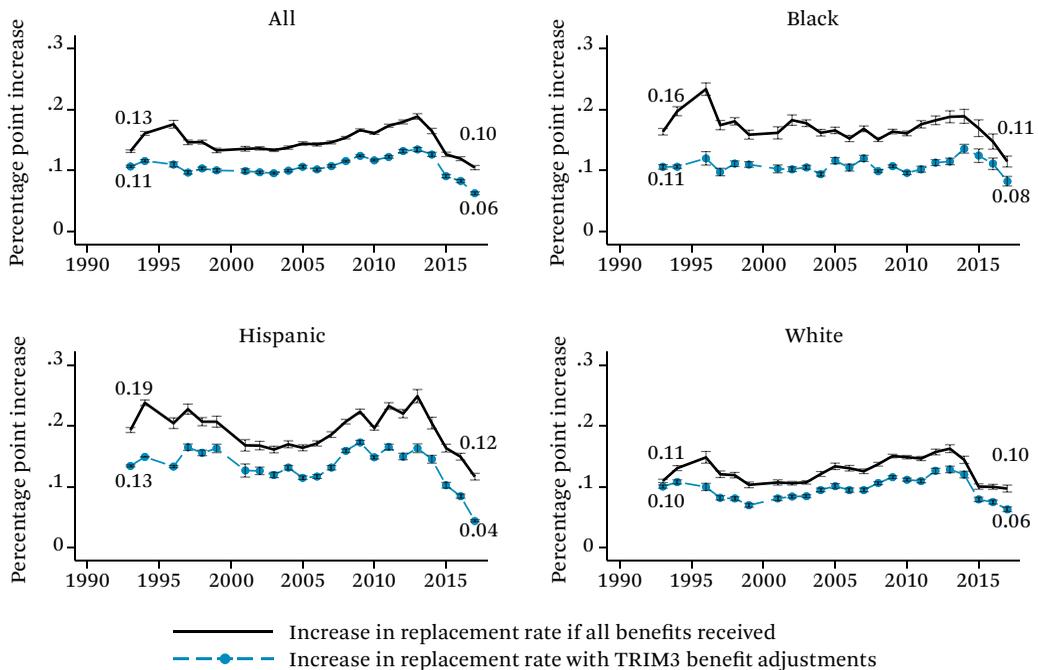
Put simply, administrative barriers and other factors that limit access to benefit receipt among the eligible are leaving considerable income support undelivered for families experiencing job loss. This is likely to affect the economic insecurity of these families. To contextualize the consequences, we visualize counterfactual income replacement rates if all families eligible for the benefits actually receive the benefits.

The thick solid line in each panel of figure 3 shows the estimated increase in replacement rates if families were to access the benefits they are eligible to receive. The dashed line presents the same, but after adding in TRIM3 benefit adjustments. The upper left panel, for example,

documents that the average low-income family experiencing job loss could have had a 13 percentage point higher replacement rate—or 11 percentage points with TRIM3 adjustments—in 1993 if they received all the transfers for which they were eligible. In 2019, however, the rate declined to 10 percentage points, or 6 percentage points with TRIM3. Thus, families are receiving a larger share of benefits for which they are eligible in more recent years compared to the early 1990s. Subsequent investigation confirms that this trend is driven primarily by rising SNAP participation among eligible families (see figure 2).

Black families (upper right) and Latino families (lower left) experienced larger potential increases in replacement rates than White families if they had received all benefits after job loss, although racial differences mostly even out after TRIM3 adjustments. Recall that TRIM3 over-allocates some income transfers toward the bottom of the income distribution, so the true replacement rate may be some-

Figure 3. Percentage Point Increase in Replacement Rates



Source: Authors' calculations from the US Current Population Survey (Flood et al. 2022).

Note: No administrative burden effect. Sample limited to households in pre-tax/transfer SPM poverty after experiencing job loss. TRIM3 adjustments applied for SNAP and TANF benefits.

where between the two lines in figure 3. Figures A.2 through A.5 present results when not cutting the samples based on income, or when cutting the sample based on income in the year before job loss. These alternative results offer similar conclusions: the potential increase in replacement rates if families facing job loss received all SNAP, TANF, and UI benefits for which they are eligible has declined over time, and is generally larger for Black and Hispanic families relative to White families, though TRIM3 adjustments continue to narrow or eliminate those racial differences.

In figures A.2 through A.5, we provide evidence that variation across time and race-ethnicity in potential increase in replacement rates is primarily driven by benefit access, rather than differences in TANF benefit levels across states or differences in compositional features of states' populations.

CHARACTERISTICS OF STATES WITH LARGE ADMINISTRATIVE BURDEN EFFECTS

Our prior results identify administrative burden effects across time by the race-ethnicity of individuals. As a final step, we investigate how the racial-ethnic composition of place is associated with administrative burden effects. Specifically, we identify demographic characteristics of states with smaller and larger administrative burden effects, measured here as the mean percentage increase in the replacement rate in a state in the absence of the administrative burden effect (similar to figure 3) averaged over 1993 through 2017. Our assessments of the state-level correlates of administrative burden effects are purely descriptive associations; the methods we use are not designed to infer causality.

Figure 4 plots the mean administrative burden effect by state, depending on the modeling decisions made: our baseline estimates with no adjustments, with TRIM3 benefit adjustments, with homogenous state-level demographic characteristics, and with equal state TANF benefit levels. Higher values (darker colors) represent stronger administrative burden effects or, more precisely, higher percentage point increases in the replacement rate of families experiencing job loss if they were able to

access all benefits for which they are likely eligible.

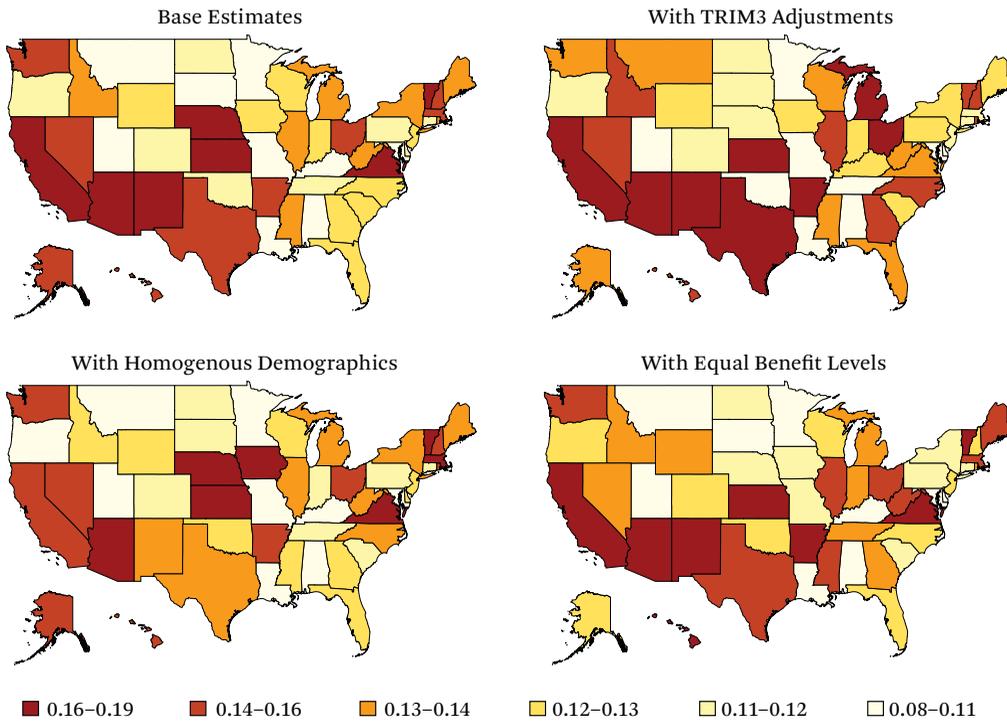
In percentage point terms, the largest administrative burden effects are concentrated in the Southwest, the smallest in the upper Midwest. Arizona, for example, consistently performs the worst of all states: in our base estimates, its average increase in replacement rates would be 19 percentage points if its families received all income transfers they are eligible for after job loss. Arizona was also the first state to reduce its lifetime limit of cash assistance from TANF to twelve months, down from the national maximum of sixty (Parolin 2021). On the opposite end, Utah is the best performing state: the average increase in replacement rates is 8 percentage points.

These geographic differences are likely to overlap with important demographic differences in the administrative burden effect. Consider, for example, that poor-performing states such as Arizona and Texas tend to have larger shares of Latino residents than other states. Even if differences in administrative burden effects do not vary widely across individuals of different races and ethnicities (see figure 3), we may see more notable disparities across places with higher proportions of Black or Latino residents.

Figure 5 investigates this possibility. Specifically, it displays the bivariate association of a state's demographic characteristics—race-ethnicity and share of children in single-parent homes—with the mean administrative burden effect—the percentage point gain in replacement rates with full transfer receipt—in the state from 1993 through 2017. We again test four variations of the estimates, aligning with the four panels of figure 4. These bivariate associations provide us a descriptive view of the characteristics of states with higher or lower percentage point increases in the counterfactual replacement rate.

With respect to race-ethnicity, the findings in figure 5 show that the larger the share of White state residents, the lower the administrative burden effect. In contrast, states with a larger share of Latino residents, in particular, tend to face larger administrative burden effects. States with larger shares of Asian residents also experience larger administrative

Figure 4. Mean Change in Replacement Rate If Families Received All Income Transfers They Are Eligible to Receive, 1993–2017



Source: Authors' calculations from the US Current Population Survey (Flood et al. 2022).

Note: Darker colors indicate a stronger administrative burden effect (defined as percent replacement rate if families received all transfers for which they were eligible minus the observed replacement rate). *Homogenous demographics* refers to results after reweighting state populations to match the national means of adults with only a high school degree, adults with a college degree or more, household structure (single parent with children, single adult without children, two-parents with children, multiple adults without children), number of children in the home, number of adults in the home, female, and employment rates. *Equal Benefit Levels* refers to an adjustment that alters AFDC-TANF benefit levels in each state-year to match the national median TANF benefit levels among recipients in the given year, effectively eliminating state-variation in TANF generosity (and thus limiting variation primarily to differential access).

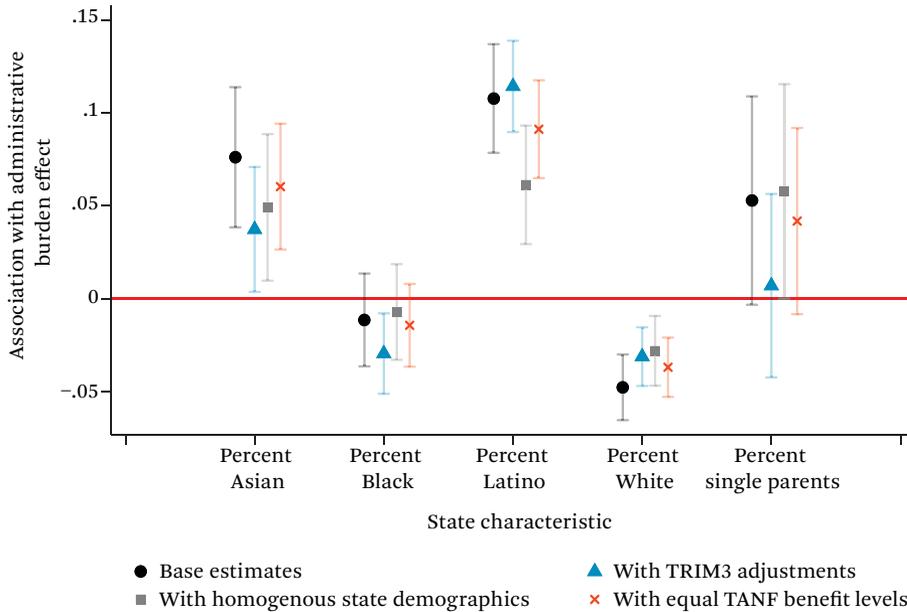
burden effects, or higher potential increases in replacement rates if families received all income transfers after job loss. The coefficients for the share of Black parents and single parents are generally insignificant.

The findings are consistent whether we apply TRIM3 adjustments for benefit underreporting, adjust to match the demographic characteristics (excluding race-ethnicity) of states, and equalize TANF benefit levels. In short, families experiencing job loss in states with higher shares of Latino residents in particular have

relatively more to gain if barriers to accessing benefits for which the families are likely eligible to receive were fewer.

DISCUSSION AND CONCLUSION

Government income support programs play a critical role in reducing hardship and economic insecurity in the event of job loss. However, that income support is not provided automatically. Potential claimants must navigate a myriad of bureaucratic processes to claim the benefits, and many potential recipients either

Figure 5. Bivariate Association of Demographic Characteristic, 1993–2017

Source: Authors' tabulation (Flood et al. 2022).

Note: Mean administrative burden effect, counterfactual increases in replacement rates. The figure plots point estimates and 95 percent confidence intervals from separate bivariate estimates that regress the mean percentage point increase in a state's replacement rate should family units receive the transfers for which they are eligible between 1993 to 2017 (*administrative burden effect*) on the labeled state-level covariate. *Homogenous demographics* refers to results after reweighting state populations to match the national means of adults with only a high school degree, adults with a college degree or more, household structure (single parent with children, single adult without children, two parents with children, multiple adults without children), number of children in the home, number of adults in the home, female, and employment rates. *Equal TANF Benefit Levels* refers to an adjustment that alters AFDC-TANF benefit levels in each state-year to match the national median TANF benefit levels among recipients in the given year, effectively eliminating state-variation in TANF generosity (and thus limiting variation primarily to differential access).

do not initiate or complete the process. These administrative burdens lead to large sums of unclaimed income transfers each year. In this article, we examine variation in the receipt of income transfers after a family member experienced job loss. We underscore three key findings.

First, individuals from low-income families experiencing job loss and who are eligible to receive income transfers are less likely to receive UI or TANF benefits in the late 2010s than in the early 1990s, but more likely to receive SNAP benefits. Thus administrative burdens, broadly defined, have worsened for UI and TANF but not for SNAP.

Second, and relatedly, individuals currently receive more of the benefits available to them than they used to. In other words, the potential increase in replacement rates for receiving all available TANF, SNAP, and UI transfers is smaller in the late 2010s than in the early 1990s. From this perspective, the contribution of administrative burdens to economic insecurity has decreased, largely due to rising SNAP participation among the eligible. However, some of the trend is also due to declining TANF benefit levels for the average state. When the value of potential income transfers declines, removing all administrative burden effects has less consequence because the income transfers do

less, by definition, to improve replacement rates.

Third, our evidence suggests that these trends have not occurred evenly across the population. Black and Latino families experience job loss at a greater rate than White families, and also generally lower income replacement rates as a result of administrative burden effects. However, across all racial-ethnic groups, administrative burden effects have declined slightly over time, likely due in part to rising accessibility of SNAP benefits. Moreover, the racial-ethnic differences narrow markedly when adjusting for benefit underreporting with TRIM3. Shifting focus from the race-ethnicity of individuals to the racial-ethnic composition of place, we find that states with higher proportions of White residents tend to have smaller administrative burden effects.

Our operationalization of administrative burdens shifts focus from specific bureaucratic steps that reduce benefit take-up to coverage rates among likely eligible individuals more broadly. This approach has several advantages. First, measuring population coverage is relatively simple and can be readily used to track variation in the intensity of administrative burdens across programs, places, time, and population subgroups. Cross-sectional snapshots of coverage rates not only reveal programs or places that should be targeted for policy intervention, but can also be used to identify aspects of program design or implementation that are effective in boosting enrollment and may be adopted by other programs or jurisdictions. Second, panel data at the household level, as this study uses, can be used to measure coverage rates after a semi-exogenous eligibility (or benefit level) trigger, such as job loss. This type of data can be useful for tracking trends in program access over time among a set of families experiencing relatively similar income shocks.

Beyond these practical and empirical advantages, our approach also shifts the locus of action away from the household and toward the state. Identifying the learning costs, psychological costs, and compliance costs that households face is essential to understanding what does and does not work in program design. Yet these behavioral- or knowledge-based explana-

tions for why households fail to enroll in social programs assume a level of agency with state interactions that may undermine efforts to expand coverage. If an eligible household remains uncovered even after addressing the myriad costs to enrollment, it can be attributed to an affirmative choice to decline assistance. If we instead take universal coverage as the working counterfactual, as this study does, any eligible households not receiving coverage continues to be viewed as a failure of the state that motivates additional interventions. This is important for two reasons. First, for many families, and particularly Black and Latino families, past discriminatory and unfair interactions with the welfare state may lessen their willingness to actively pursue the benefits they are entitled to receive. Reducing enrollment costs is not enough to surmount the legacy of exclusion that colors families' perceptions of government programs. Second, heterogeneity in the capacity of households to navigate interactions with the state is extreme; an enrollment process deemed low cost or accessible to the median eligible family may still be too difficult for many. Taking full coverage as the goal makes it the explicit responsibility of the state to ensure that all families receive the support they need and deserve, regardless of their cognitive abilities, language facility, or physical capacities.

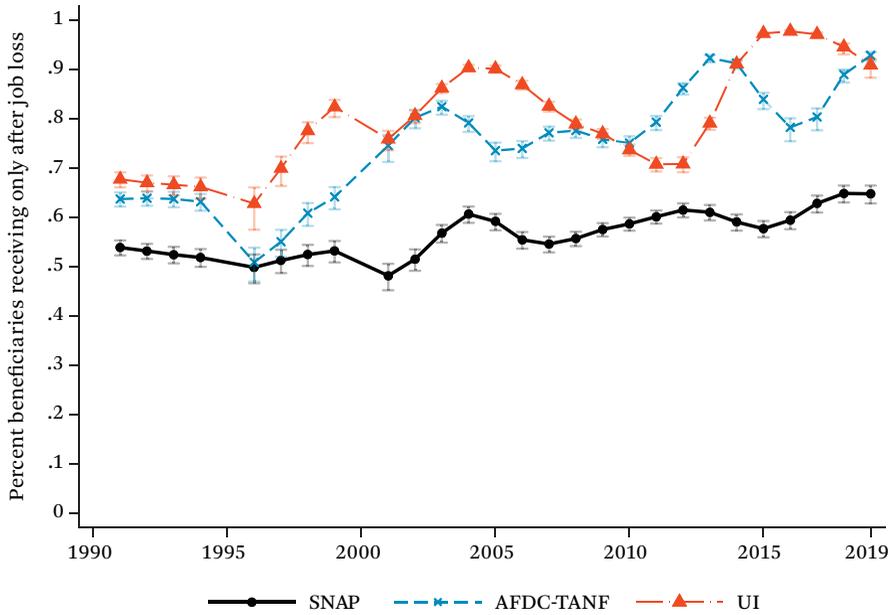
Moving forward, improving data collection is key to measuring administrative burden intensity and evaluating policy interventions. Data reporting should be standardized and streamlined so that policymakers and the public can quickly evaluate coverage across programs and jurisdictions. A dashboard that includes basic information, such as coverage rates among eligible individuals, time from application to benefit receipt, success rates from initial application, and so on, would be useful for setting benchmarks to evaluate the performance of state and federal governments. This administrative data can and should be paired with improved qualitative and quantitative data collection at the household level. Household panel surveys, for example, could benefit from incorporating a battery of questions regarding experiences navigating program enrollment: whether the household considered applying for a program, number of attempts, outcome, and

so on. This information could be used to identify which stages of the initial enrollment or recertification process should be targeted for intervention.

Administrative burdens contribute to lower income replacement rates for families experiencing job loss, our study suggests, particularly

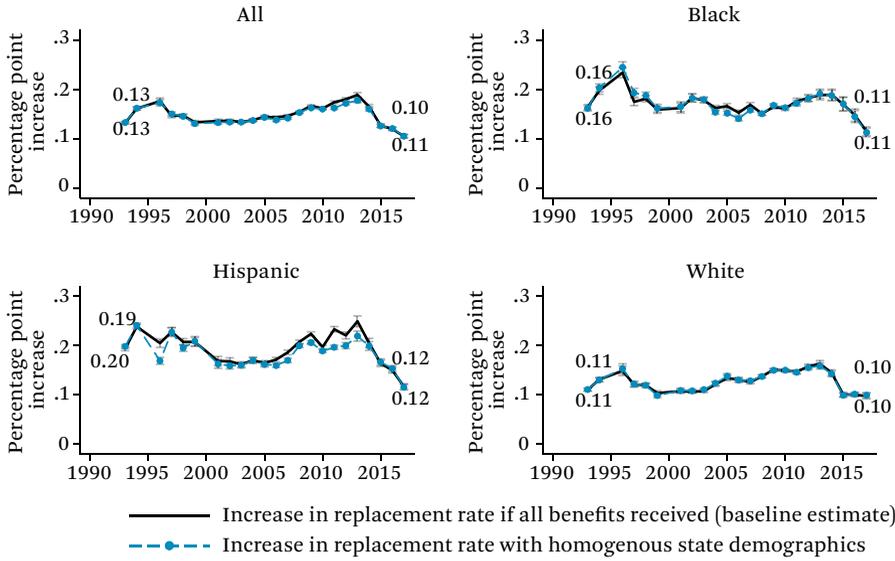
for Black and Latino families and in states with large shares of non-White residents. Improving the evaluation of administrative burden effects, and identifying solutions toward reducing them, may be important for promoting greater economic security and reducing racial-ethnic inequalities in economic well-being.

Figure A.1. SPM Family Units Receiving Benefit Only in Year of Job Loss



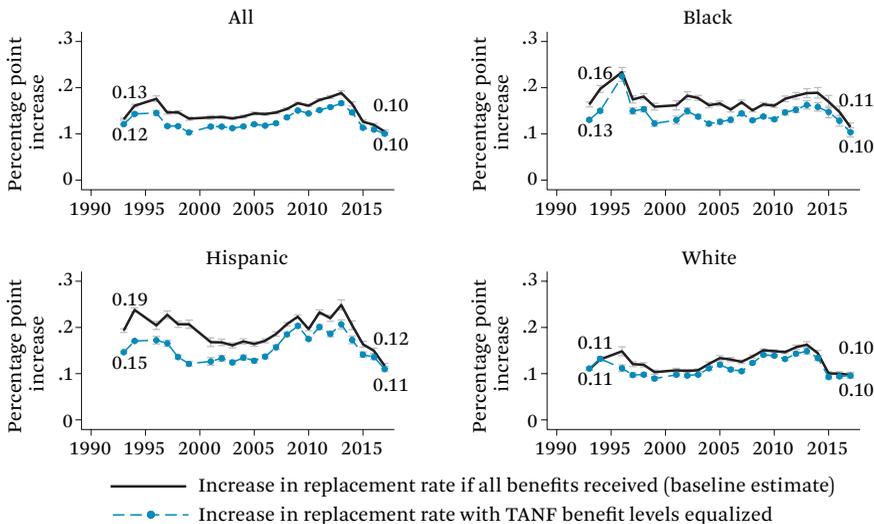
Source: Authors' calculations from the U.S. Current Population Survey (Flood et al. 2022).

Figure A.2. Consistent Compositions Across States



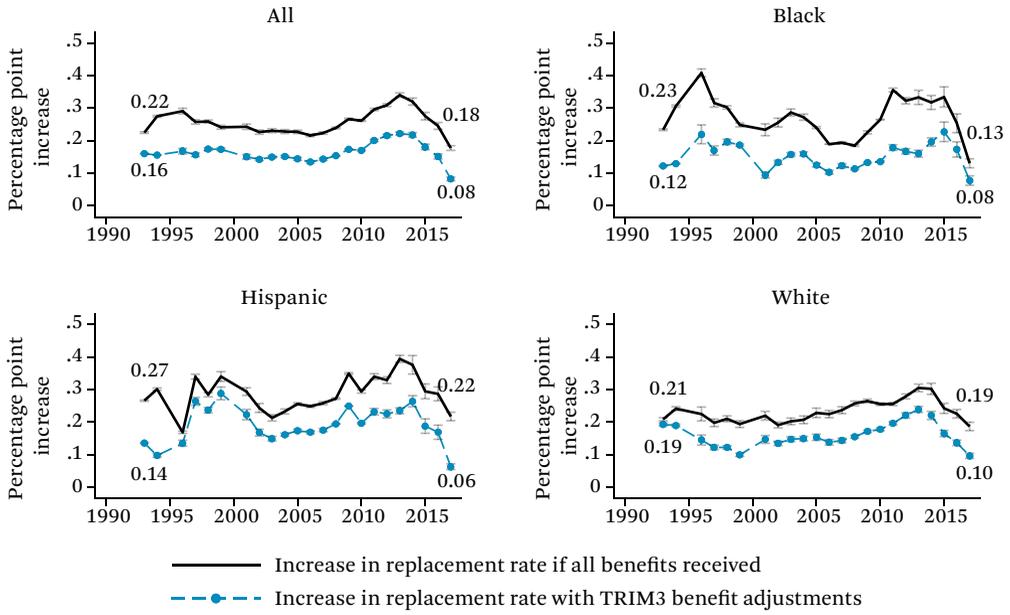
Source: Authors' calculations from the US. Current Population Survey (Flood et al. 2022).
 Note: Percentage point increase in replacement rates if family units received all income transfers for which they are likely eligible (no administrative burden effect). We reweight state populations to match the national means of adults with only a high school degree, adults with a college degree or more, household structure (single parent with children, single adult without children, two parents with children, multiple adults without children), number of children in the home, number of adults in the home, female, and employment rates.

Figure A.3. TANF Benefits Equalized



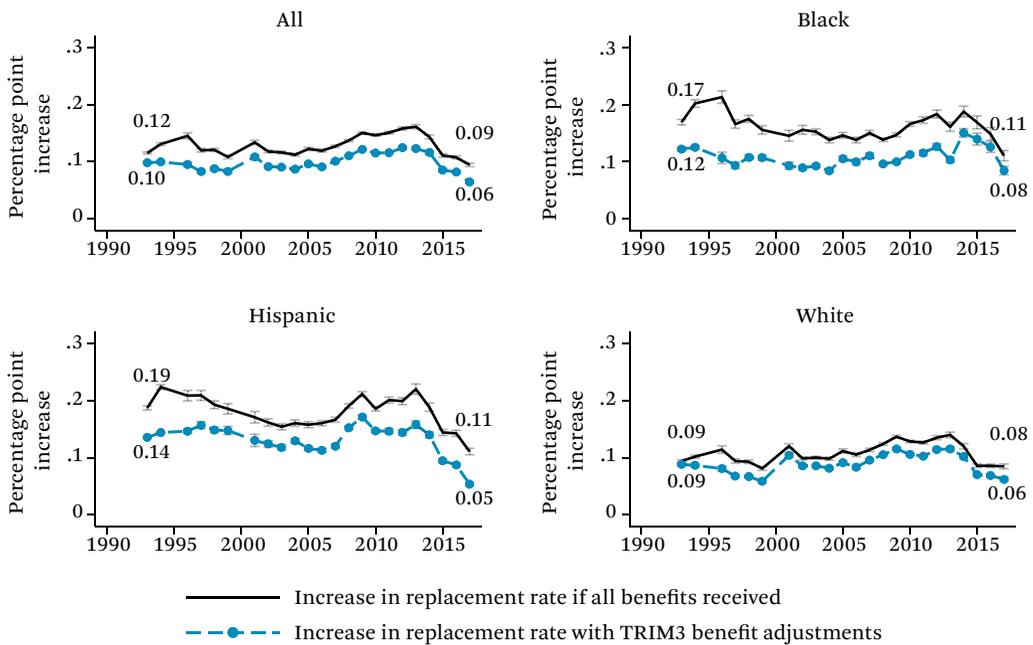
Source: Authors' calculations from the US. Current Population Survey (Flood et al. 2022).
 Note: Percentage point increase in replacement rates if family units received all income transfers for which they are likely eligible (no administrative burden effect). We adjust AFDC/TANF benefit levels in each state-year to match the national median TANF benefit levels among recipients in the given year, effectively eliminating state-variation in TANF generosity (and thus limiting variation primarily to differential access).

Figure A.4. Results for All Family Units Based on Prior-Year Income



Source: Authors' calculations from the US. Current Population Survey (Flood et al. 2022).
 Note: Percentage point increase in replacement rates if family units received all income transfers for which they are likely eligible (no "administrative burden" effect). Sample limited to family units with pre-tax/transfer incomes below half the national median income in the year prior to job loss.

Figure A.5. Results for All Family Units Regardless of Income



Source: Authors' calculations from the US. Current Population Survey (Flood et al. 2022).
 Note: Percentage point increase in replacement rates if family units received all income transfers for which they are likely eligible (no administrative burden effect).

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The Wait List as Redistributive Policy: Access and Burdens in the Subsidized Childcare System



JENNIFER W. BOUEK

This article theorizes the wait list as an underexamined vehicle of administrative burden. Wait lists are now common within the U.S. social safety net, yet little research has considered their administration. Drawing on a surprising case of Massachusetts' declining wait list for subsidized childcare, I find that administrative burdens were introduced to the list following state questioning of agency competence. The burdens have resulted in the ongoing deactivation of thousands of caseloads from the list per month and a 75 percent reduction in the total number of waiting families in just five years. My findings suggest wait lists as understudied but consequential sites of opaque policymaking that shape access to critical social services and the legibility of unmet need.

Keywords: childcare, wait lists, inequality, social welfare

Stephanie learned that she was pregnant during her last year of college.¹ She moved home to Boston, had her baby, got a job, and planned to start a life for herself and her child. Stephanie's job, though, paid just \$2,100 a month—enough to keep her out of poverty but not enough for rent, food, or diapers and certainly not enough for childcare. Stephanie applied for the state subsidized childcare program, a criti-

cal social welfare program that provides care to low- and moderate-income working families for free or at a reduced price. Despite her eligibility, Stephanie was unable to obtain assistance. Limited funding had restricted the number of available vouchers. Instead, she was placed on the state's wait list, a process that according to Stephanie went as follows: "Do your application, we'll put it in the system,

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1. All participants' identities have been anonymized.

you'll get a confirmation letter when we send out updates, and wait."

Stephanie's experience is not uncommon. Increasingly, this is how many social welfare programs work: apply and wait. Like publicly subsidized childcare, many means-tested benefits are now managed from a place of scarcity. Amid the broader shift of the twentieth-century American welfare state from entitlement to eligibility (Allard 2009; Hasenfeld and Garrow 2012), gaps in funding have been increasingly filled with wait lists to catalog the families eligible for but without access to multiple forms of social assistance, including subsidized childcare but also housing assistance, substance abuse treatment, elder care, and even emergency homeless shelters, among others. Wait lists are now foundational to and ubiquitous within our social safety net.

Even so, their significance has been only peripherally considered. Existing work notes lengthy and problematic wait lists (DeLuca, Garboden, and Rosenblatt 2013; Desmond 2016; Moynihan, Gerzina, and Herd 2021) and more broadly lengthy and problematic wait times (Auyero 2011; Cohen 2018), but we know less about how wait lists are managed and why, the scope of administrative burdens attached to them, and the implications for citizens' access to public resources. These questions are important for two reasons. First, wait lists function not only as precursors to obtaining assistance for those in need, but also as public performance measures for those in charge, making them co-constitutional social statistics relevant to both beneficiary and elected leader. Second, wait lists operate in spaces with little public oversight or opportunities for public scrutiny, meaning that they may also create opportunities for discretionary decision-making that could lead to exacerbating systems of inequality. Uncovering the rules and practices—the administrative burdens—through which wait lists are governed is therefore critical to understanding issues of access in the contemporary social safety net.

To examine the role of administrative burdens in wait lists, I draw on the surprising case of Massachusetts' recently declining wait list for subsidized childcare. Between 2013 and 2018 it dropped by 75 percent, from nearly sixty

thousand cases to fifteen thousand, where it remains today. Given the historical and widespread scarcity that has characterized the subsidized childcare program, the decline in wait list numbers is at first perplexing. Current estimates suggest that just 8 percent of the nearly thirteen million eligible children nationwide receive subsidized services (Ullrich, Schmidt, and Cosse 2019). Other families, like Stephanie's, often wait for years. Thus—and especially given the consistency of program eligibility requirements, the absence of change in program capacity, the historical underfunding, and the rise in employment rates in the state over this same period—one might have instead predicted a growing wait list.

To explain, I redirect attention to the administration of the wait list and its significance as a discretely managed public performance measure. In my review of archival documents, I find that immediately before the rapid plunge in wait list numbers, state officials, wary of the growing length of the list, had ordered an audit of the state's Early Education and Care (EEC) Department with the primary goal of reviewing the agency's wait list. The audit found evidence of possible inflation, which state leaders attributed to agency mismanagement. In response, the list was "cleaned" and additional administrative requirements for clients to remain on the list were introduced, resulting in the sudden drop in wait list numbers as caseloads were terminated for failure to adhere to the new and newly enforced burdens, even as evidence of ineligibility remained ambiguous.

In the second half of this article, after this historical context, I explore the downstream burdens created for families and organizations. I find that, first, terminations have continued so that thousands of cases are currently deactivated from the wait list every month, despite demographic estimates suggesting persistently higher levels of unmet need, and second, that wait list numbers have especially declined within majority Black, Hispanic, and immigrant communities. Meanwhile, the newly introduced administrative practices also placed an additional level of burden onto contracted providers, contributing to a parallel and material, and ongoing, reduction in subsidized childcare at the level of the organizational field.

Ultimately, I argue that because the wait list came to symbolize agency competence, the performance of the list itself became the problem to resolve rather than the possible unmet need it represented. This analytical delineation is important because it shifts attention away from wait lists as objective indicators of need to instead emphasize them as understudied but consequential sites of opaque policymaking that can shape both access to critical social services and the legibility of unmet need.

BACKGROUND

The subsidized childcare program is a critical antipoverty and child well-being program designed to support intergenerational mobility through maternal employment and child development. Federally funded by the Child Care and Development Block Grant, states are allotted grants through which to support the establishment of public-private childcare markets for low- and moderate-income families. Much like under the Housing Choice Voucher program, beneficiaries are typically given time-limited vouchers with which to “purchase” childcare from private providers contracting with the state. Although friends and family members can be designated as caregivers, contracted providers are typically childcare centers or in-home family childcare providers, which are licensed facilities operated out of the provider’s home.

Access to the program, however, is increasingly limited because voucher availability and the number of subsidized providers have both declined nationwide over the 2010s (Mohan 2017; Ullrich, Schmidt, and Cosse 2019). Consequently, many states now revert eligible families to wait lists. As of 2016, eighteen states had wait lists for subsidized childcare with the reported length of the lists ranging from twenty-four in Colorado to more than twenty-four thousand in Massachusetts.² Longer lists have been more recently reported, such as in Texas when approximately seventy-five thousand children statewide were waiting for subsidized care in 2018 (Waller 2018). Although data are scarce on how long parents typically spend on these

wait lists, the National Women’s Law Center (NWLC) finds that parents could wait anywhere from under six months to a year or more (Schulman and Blank 2016).

Subsidized childcare, however, is far from an isolated case. Wait lists now appear to be commonplace in the process of securing a range of social services. The waiting list for Medicaid waiver services in New Jersey, for example, is 8,500 people with a wait time of three to six months. This is short relative to other states, such as Texas, where one mother was told that the wait for disability services for her children showing signs of severe autism would be ten years (Stuckey 2022). Demand for housing assistance also is so severe in some areas, such as Denver or Houston or New York City, that wait lists are no longer open for enrollment. Instead, lotteries are held for the possibility of getting onto the list. Despite their rationing, the national average wait time for housing assistance is two years (Fischer and Sard 2017). Even when services appear critical to the health and survival of an individual, a wait list is still likely. In Maine, for instance, 925 elderly residents were wait-listed for home health care as recently as 2021. One resident, eighty-year-old Louise Shackett, refused to understand: “I should be getting the help I need *and that I am eligible for*” (Galewitz 2021, emphasis added).

In the contemporary United States, however, eligibility for services can mean little. Despite some expansions of the social welfare state over the past several decades, state agencies still find themselves underresourced and ill equipped to grapple with growing demand (Edin and Shaefer 2015). The origins of this disenfranchisement were formalized in the 1996 welfare reforms, which restructured the way public assistance is delivered. With the intention of promoting a work-first welfare state, direct cash payments were largely replaced with in-kind services (Allard 2009). These services, however, were introduced under an eligibility rather than entitlement model, meaning services are rendered only when budgets allow. Childcare offers an insightful case.

2. The National Women’s Law Center, which collects this data, stopped reporting on waitlists after 2016. States’ reporting on lists is highly variable because of a lack of federal standards in waitlist administration.

Given the work-first approach of the reforms combined with the fact that most welfare recipients were mothers (Moffitt 2015), policymakers recognized childcare as indispensable to any path forward. Between 1996 and 2003, total federal spending on childcare for low-income families tripled from \$4 billion to more than \$12 billion. Spending increases, though, in parallel to other assistance programs, slowed in the 2000s and remained stagnant for nearly two decades. It was not until 2018 that any meaningful reinvestments were made in the childcare program and even then, total spending remained below 2003 levels. COVID-19 relief has sent more money into childcare with 2022 budget projections around \$33 billion, but spending is anticipated to return to pre-pandemic budgets by 2024 (Hahn et al. 2021).

With too few resources and unable to serve all eligible, policymakers and bureaucrats instead resorted to rationing and triaging strategies, including the implementation of wait lists. Predictably, then, as spending on subsidized childcare slowed, state wait lists for the program grew. Estimates from the NWLC suggest that by 2016 more than 450,000 children nationwide were on state wait lists for subsidized childcare, excluding those in California and New York where records are maintained at the local district level and aggregate statewide data are not available (Schulman and Blank 2016).

To be sure, childcare wait lists are not isolated to the public program. Even for those able and willing to pay privately, accessing a slot may take years. Although no systematic data collection on the length of individual childcare provider wait lists is in place, popular reporting suggests that wait lists for non-subsidized infant care in a licensed and out-of-home childcare setting (that is, not a nanny or an au pair or kith and kin) can easily be more than a year long and in some markets up to three years (LegUp 2022; Nguyen 2021). But while the scarcity of childcare in the private market can be rationed through price, a practice that exacerbates inequalities elsewhere, the state must resort to alternative methods. One such alternative method is the management of wait lists.

BURDENS AND THE POLITICAL SALIENCE OF THE WAIT LIST

Scholars have highlighted how bureaucratic complexity can be intentionally invoked to covertly triage scarce resources (Gustafson 2011; Hacker 2004; Herd and Moynihan 2018; Lipsky 1984), a process Michael Lipsky called “bureaucratic disentanglement” (1984, 9). Although wait lists do not necessarily have to be spaces of complexity, they often are. Research on rental assistance wait lists, for example, has found that beneficiaries experience the process as “opaque and complex,” and one that typically involves considerable labor and requires significant knowledge to successfully navigate (Keene et al. 2021, 1). Learning about the existence of and how to navigate a wait list, for instance, can be read as forms of what Donald Moynihan and colleagues (2015) call “learning costs.” Who does one call to be placed on the list? What are the policies to get and stay on the list? How does one move up or down on the list? And how might one check their status? Managing these requirements after learning about them, represent forms of “compliance cost,” (Moynihan, Herd, and Harvey 2015). Gathering paperwork, submitting changes of address, and responding to annual interest letters, among other requirements, all exact the burden of compliance from beneficiaries.

Beyond list logistics, the experience of waiting and the accompanying uncertainty can become a deliberate and specific form of disentanglement (Heinrich et al. 2022). Stephanie Pierce and Stephanie Moulton, in their discussion of mortgage relief (2023, this issue), describe how long wait times for services can amount to what they classify as passive compliance costs, in which an individual is tasked with waiting on the state to act. These passive costs can affect who receives services, and who does not, because not all applicants will be able to persist. Given that many waiting on services may also be in a state of crisis, the act of waiting itself could be elevated to a third type of cost: psychological (Moynihan, Herd, and Harvey 2015). Those waiting may often have only a vague timeline for when services can be expected, if ever, and are often waiting for resources critical to their well-being. Waiting in

this sense is a visceral experience of power (Bourdieu 2000).

Significant here, however, is that these burdens are not inevitable. They are the result of choices made by state and local administrators. The costs exacted therefore can and do vary based on these choices, which is why it is important to remember that wait lists are not just relevant to those doing the waiting. Wait lists can also be public performance measures, making them additionally relevant to the politicians and nonelected state actors who manage and are evaluated by the lists.

Like other social statistics, wait lists operate on a dual plane. On the one hand, they can be resourceful for the fair and transparent dissemination of public services, incentivizing public actors' accountability (Heinrich and Marschke 2010; Porter 1995). Wait lists can, for example, demonstrate how effectively a program's resources are being distributed or help officials weigh the magnitude of unmet need. On the other hand, though, social statistics are prone to manipulation precisely because they are also evaluative measures reflecting the successes or failures of administrative actors (Espeland and Sauder 2007; Heinrich and Marschke 2010; Moynihan 2008). For example, using the case of standardized testing in public schools, Brian Jacob and Steven Levitt (2003) demonstrate how the intensification of standardized test scores in teacher evaluations in the Chicago public school system significantly increased not student achievement, but teacher cheating. Teacher cheating was also more likely to occur in high-stakes circumstances, such as low-achieving classrooms, and less so when the benefits of cheating were lower and the costs higher (Jacob and Levitt 2003, 847). We could similarly consider the 2014 scandal at the Veterans Health Administration (VA). To incentivize responsive services for veterans, VA administrators' pay structure rewarded short turnaround times. But because the VA lacked the resources to meet these deadlines, executives instead encouraged staff to falsify information (Lopez 2015; Moynihan 2014). In each example, the performance measures came to reflect the appearance of progress rather than progress itself.

These cases tell us four things about perfor-

mance measures as social statistics. First, they are intended for transparency and fair governance and therefore are taken seriously as evaluative measures for individuals and organizations (Heinrich and Marschke 2010; Porter 1995). Consequently, and second, performance as behavior can become disassociated from performance as information (Moynihan 2008, 5), resulting in the strategic "gaming" of important performance indicators (Espeland and Sauder 2007). Third, an actor's propensity for gaming performance measures is typically relative to how much weight is placed on the performance measure itself and the actor's ability (resources) for achieving the measure (Heinrich and Marschke 2010). Fourth, their manipulation can have material consequences, especially for vulnerable populations.

Wait lists, therefore, can be tools for both resource management *and* impression management. In fact, they are ideal sites for the latter because they are typically maintained almost entirely under the supervision of nonelected bureaucrats, including local authorities (Keene et al. 2021; Leopold 2012), and with little public oversight. Given these qualities, I theorize the wait list as a discrete site of "subterranean" policymaking (Hacker 2004), the methods of which are accomplished or capable of being accomplished by the introduction, repeal, or modification of administrative burdens. To demonstrate, I draw on in-depth interviews and analysis of administrative and archival data to first describe how the Massachusetts state wait list for subsidized childcare became a significant social statistic, and one that was emblematic of agency dysfunction, and how administrative burdens were invoked to restore its integrity. Second, I explore the downstream effects of these administrative burdens at the individual and organizational levels.

POLICY SETTING

Childcare represents more than an insightful case. Extensive research has demonstrated the robust relationship between childcare availability and mothers' labor-force participation (Aaronson and Alba 2021; Blau and Robins 1989; Landivar et al. 2020; Presser and Baldwin 1980). Early childhood contexts also have implications for children's cognitive and emo-

tional development, the effects of which can reach long into adulthood (Heckman 2006). Even so, childcare remains unaffordable and broadly inaccessible. Childcare costs typically rival and sometimes surpass housing costs in most states (DeParle 2021). According to recent data collected and analyzed by the Economic Policy Institute, for example, infant care in Massachusetts is 31 percent more than the average rent. Similar patterns are found across the country: in Connecticut infant care is 11 percent higher than the average rent, in Indiana it is 24 percent higher. In Wyoming, a minimum wage worker would need to work full time for thirty-seven weeks to pay for childcare for just one infant.

Yet the majority of mothers still work. As of 2020, 67 percent of mothers with children younger than six years old were in the formal labor force (Women's Bureau 2020). This means that every day, mothers without safe or reliable childcare must make difficult and sometimes dangerous decisions about their employment and their children's care (Edin and Shaefer 2015; Levine 2013). This context is what makes subsidized childcare so critical. In an attempt to more strategically deliver services, states have adopted a triage schema, prioritizing vouchers for teen parents, homeless families, and those currently or recently receiving cash assistance or welfare, among a few other select groups. Families involved with child protective services through the Department of Children and Families (DCF) are also typically prioritized and, in Massachusetts, placed directly into services. Their prioritization means that families in "target" groups are less likely to be placed onto the wait list, but, as Frank Edwards and his colleagues (2023, this issue) document, are likely to endure other versions of administrative burdens.

For all other eligible families, the wait list is now the first step to receiving services in Massachusetts, as in many other states. Getting onto the list is straightforward. You need two things: your personal information and contact with a wait list administrator. This administrator can be any employee of a subsidized childcare center, a Child Care Resource and Referral (CCRR) caseworker, or those working the 211-hotline. At first pass, this administrator will

input your name, your contact information, your stated income, and the number of children in your home, among other data, into a centralized platform called KinderWait, a system used by several other states and owned by Controltec, a company that specializes in what it calls childcare subsidy management solutions and that was recently bought out by the private equity firm Firmament—a business model built around the proliferation of wait lists to support my earlier point. Immediately, the software will compute your eligibility. If deemed eligible, your file will be registered on the list until funding becomes available, a wait that can take from months to up to two or three years. Once you receive an offer, you can officially apply to the program, a process that takes from days to several weeks. As detailed in the sections that follow, however, *staying* on the wait list can require consistent and considerable labor.

From a demographic standpoint, most families likely to be on the wait list would be most accurately categorized as *near poor*, that is, earning too much to be considered highly vulnerable but not enough to afford childcare in the private market. Income eligibility parameters for subsidized childcare are generous relative to other assistance programs. In Massachusetts, eligibility is 50 percent of the median state income, which as of 2016 equated to a maximum annual income of just over \$55,000 for a family of four. At the other end, though, are families who likely have very few resources, including any classification from the state. For example, all homeless families are now prioritized on the wait list according to the McKinney-Vento definition. However, at the time of this study, a family was only deemed homeless by the EEC if living within a state-sanctioned Department of Housing and Community Development shelter, de facto excluding those living in hotels or cars or other precarious and possibly unhoused arrangements. For this article, then, unhoused and otherwise vulnerable families absent of a state classification were possibly also on the wait list.

It is also mothers, and especially poor and near-poor mothers of color, who are likely to be on the wait list. Black mothers in particular have significantly higher rates of subsidized

childcare program participation than White or Hispanic mothers (Radey and Brewster 2007). Recent administrative data also suggest that a substantial portion of those on Massachusetts' wait list are not native English speakers, nearly 16 percent of children on the list indicating Spanish as their first language, followed by smaller percentages indicating Portuguese or Haitian Creole as their primary language.³ Barriers to accessing childcare, including administrative burdens buried in the wait list, therefore contribute to the gendered and racialized reproduction of inequality, what Whitney Laster Pirtle and Tashelle Wright term “structural gendered racism” (2021) and reflect inter-sectional disadvantages similar to those documented within and reverberating across many other institutional contexts (Sackett and Lareau 2023).

DATA AND METHODS

The data used in this article originate from two primary sources: in-depth interviews and administrative records. In total, I interviewed forty individuals working within or around the field of subsidized childcare in Boston, Massachusetts (table 1). Because my interests lay in the relationship between the state and families' access to childcare, I intentionally reached out to those working in the subsidized system. Among them, seventeen were directors of centers, including executive directors overseeing multiple sites and directors of specific elements of the programs such as enrollment. These seventeen individuals represented eight organizations. I also interviewed two individuals currently or formerly employed by the EEC and two from the CCRR agency, which are nonprofits regionally subcontracted by the EEC to manage the distribution of vouchers and placement of families into subsidized slots. It was during one of the latter interviews that I was introduced to the original wait list conflict and cleaning that resulted in many of the burdens introduced and discussed below.

I recruited participants through multiple outlets. First, I strategically cold-called and emailed local advocates and providers whom I had heard speak at public board meetings. I

Table 1. Interview Participants by Occupation

	N
Childcare providers	
Subsidized center directors	17
Private center directors	2
Teachers	4
Bureaucrats	
CCRR	2
EEC licensor	1
Former EEC commissioner	1
Policy Advocates	
Local	4
National	5
Related	
Community college counselor	1
Subsidized housing	1
Social worker	2
Total	40

Source: Author's tabulation.

then relied on snowball sampling and interviewee referrals. Interviews took place in person and over the telephone. All but two were recorded and later transcribed. Of the two interviews not recorded—one because of technical failure and the other by request—I took detailed notes immediately following. Interviews were frequently prefaced and followed up with ongoing email conversations.

It was from these individuals that I began piecing together a broader understanding of how the wait list functioned and how it did not, as well as the wider institutional history of the list. In most interviews, the wait list emerged unprompted when I asked about the mechanics of serving subsidized families. For some, the wait list was more problematic than for others. It was from enrollment directors that I learned about the technical logistics of the wait list and in particular the monthly deactivation of children from the wait list.

To corroborate these deactivations and the longer wait list history, I submitted a public records request for administrative data from the EEC on the number of children actively on the wait list, number terminated from the wait list

3. EEC administrator, email correspondence, November 23, 2022.

in total, by zip code, and by reason, in addition to the number reinstated to the wait list following a termination by month for November 2013 to December 2019. The numbers aligned with what participants had described to me, but still missing was an explanation for the terminations. As Javier Auyero (2021) argues in his advocacy for political ethnography, “numbers provide a baseline but not the complete truth.”

To better understand the context and possible reasons for the wait list decline and ongoing terminations, I first reviewed annual EEC legislative reports from 2012 to 2017, EEC management bulletins, and third-party research reports, including two Urban Institute reports commissioned by the EEC. I then returned to my fieldnotes taken while attending the EEC monthly board meetings beginning in November 2016. In all, over a three-year period, I had attended or viewed online eighteen of these meetings, which begin with an open public commentary period followed by organized discussion of ongoing agency business. To validate the notes I had taken, I requested minutes of public board meetings and other relevant public committee meetings from January 2013 through December 2017. I analyzed these documents, in total 427 pages, for mentions of the wait list as well as voucher funding and slot use updates, which helped me piece together a timeline of the wait list’s recent history and political shaping. These minutes led me to the 2014 state audit of the EEC, the investigation that became the instigation for the original wait list cleaning and which I was able to locate online. This audit, in addition to local reporting and the archival materials discussed above, became central to my understanding of the wait list as presented here.

RESULTS

Between 2013 and 2018 the number of cases on the Massachusetts wait list for subsidized childcare dropped by 75 percent. The drop was sudden and should have been unexpected given the program’s historical underfunding combined with limited changes to eligibility requirements and no meaningful changes in program capacity statewide. In other words, the list was not going down because people were getting in. In addition, demographic estimates

would have similarly supported more demand: the state’s child population remained relatively stable, unemployment rates fell from 6.7 to 3.7 even as economic inequality worsened. It was unlikely, then, that the list was shrinking because of population-level changes. This article theorizes instead a third source of change: political administrative.

In Massachusetts in 2014, a state audit of the EEC led to the intensification and renewed enforcement of multiple forms of administrative burdens for families navigating the program’s wait list. The audit came following a meteoric rise in the number of caseloads on the wait list, a number that was at once shocking but also predictable because by 2011, the EEC had imposed a voucher freeze due to the “unstable economy” and a fear of overspending the budget. The freeze would last two and a half years and result in the exponential growth of the wait list. Former Commissioner Killins explained to a reporter in early 2013, “We have seen a surge of about 2,000 people per month go on to our waiting lists and we have not been able to respond to that need” (Johnson 2013). By 2013, the state’s childcare wait list reached nearly sixty thousand, quadrupling since 2005 and becoming one of the longest in the country.

Still, the wait list was not a problem until it was declared one. As Moynihan (2008) points out, the meaning of performance measures is highly subjective. The context of the wait list as problematic only shifted when rising caseloads collided with calls for universal childcare from then Governor Deval Patrick. Patrick had run on a platform of education, including early education and care. In 2008 his administration had published their education agenda, “The New Promise of Public Education.” Among promises of expanded community college and teacher retention was universal early education: “a coordinated plan to provide high-quality early education and care for *all children beginning at birth*” (The Patrick Administration Education Action Agenda 2008; emphasis added).

Patrick tried to make good on his promises, repeatedly calling for increased investments into public education, including expanded access to early education. In his January 2013 State of the State address, Patrick specifically touched on the EEC wait list and universalizing

childcare: “Toddlers, infants, other preschoolers, 300,000 [*sic*] of them are on the wait list for early education opportunities. Let’s ensure that every child in Massachusetts has access to high quality early education” (Patrick 2013). Soon after, the governor requested an additional \$131 million intended to eliminate the EEC’s wait list and expand early education access over the next four years, in addition to other investments like teacher salaries. State senate leaders responded by publicly questioning the agency’s competence and would later approve only \$15 million.

At a time when state resources were still limited from the effects of the Great Recession, repeated calls for increased spending appeared to cause tension between the Governor and House Speaker Robert DeLeo. A 2013 news article from the *Boston Herald*, published only weeks after the governor’s address, reads, “A fed-up House Speaker Robert A. DeLeo—already in a showdown with Gov. Deval Patrick over taxes—vowed yesterday to clean up two scandal-ravaged agencies in the Patrick Administration, telling the Herald the abuses in the welfare and early education departments must stop” (Cassidy 2013). In fact, the cleaning up had already begun.

Questioning whether the agency was “managing its money and caseload efficiently” (Levenson 2013), and specifically suspicious of the recent wait list growth, DeLeo had ordered an investigation into the EEC from the newly minted state auditor’s office: “Before we make any further investments, we want to make sure their house is in order.” The audit would span two years, from 2011 to 2013, and not be published until November 2014. It would find evidence of agency wait list mismanagement, revealing more than 21,500 “possibly ineligible” children on the wait list.

While under investigation by the state auditor, however, the EEC leadership defended the validity of their wait list data. After the audit was well under way but not yet published, board members strategized about how to communicate the authenticity of their data: “Board Member Childs reported that the active wait list for childcare subsidies has grown to more

than fifty thousand children. Board Member Scott-Chandler opined that although the data demonstrates that the wait list is increasing, stakeholders do not trust the data, so the Department needs to get the message out that *this data is not inflated and reflects real children.*”⁴

Given the voucher freeze, an increasing wait list was not unexpected. After all, newly added cases were still being screened by caseworkers and systems such as KinderWait before they were ever placed onto the list. As described to me by Claudia, who worked at a subsidized childcare program that operates three centers and whose entire job consisted of managing those centers’ enrollment, “it’s all in the computer.” When she mentioned her guilt when parents came in and earned \$100 or so over eligibility, I asked her if she was ever tempted to manipulate the results. She explained, “It won’t let us. It just says, ‘exceeds the income.’ . . . It’s sad because you wish you could help them but there’s just no way because it’s just all in the computer, it calculates it itself.”

The possible overestimation was problematic for the state for two reasons. At the time, in addition to recording waiting families, the state claimed to use the wait list as a funding barometer. Consequently, the auditor’s office argued that “inaccurate data may adversely affect the Legislature’s ability to assess the need for childcare services and establish appropriate funding.” Overestimating need could presumably result in overbudgeting. Even so, the legislature had already begun cutting the agency’s budget. Between 2010 and 2012, the years of the greatest wait list growth, the EEC’s budget dropped by more than \$30 million, including funding for expanding access to income eligible families, suggesting that numbers alone were not dictating this process.

The second problem was more political. As an executive at the National Women’s Law Center explained by email, state actors must be concerned about not only the accuracy of the list but also “the negative political consequences of having a long waiting list, and how it would look to the public and/or advocates.” DeLeo, too, had positioned himself as a friend

4. Board meeting minutes, January 8, 2013 (emphasis added).

to the early education and childcare sector and an advocate for early childhood education (Children's Trust 2016; MADCA 2017). An ever-growing wait list was in neither Patrick's favor nor his own. Still, as House speaker, DeLeo was also responsible for helping manage the state budget, which at the time was strained from the lingering effects of the Recession. Even had the list reflected only "real children," existing funding for them all was hardly enough. By redirecting attention to the agency's performance, the debate pivoted to focus on the agency's inability to manage the list rather than the legislature's inability to fund it.

When the audit was released, one of the problems the investigation revealed was duplicates. Because of the many wait list administrators, some families were being placed on the wait list more than once. Even so, duplicates were only a minor problem, accounting for fewer than seven hundred of the 21,561 estimated overage. The others, according to the auditor's report, were records of children that had not been updated in twelve months or more, an existence that technically violated EEC policy and that the state wanted fixed.

In practice, the agency was balancing type 1 false-positive errors over type 2 false-negative errors by intentionally keeping families on the list who may have no longer been active only because of a recent glitch. Relevant case file information, including families' dates of application, had been lost when the wait list had been transitioned over to KinderWait in 2011. Rather than terminate families inaccurately, the agency disabled the platform's automatic archive system to allow families to remain on the list under the new platform for at least a year, meaning that families who were no longer eligible or active were possibly still on the list. Following the audit, however, the feature—which automatically archives families inactive in the system for twelve months and two weeks or more—was reinstated and more than twenty thousand children's entries were immediately deactivated. Although now impossible to say with confidence, this pivot likely flipped the risk-reward ratio to instead prioritize the integrity of the list but at the expense of potentially

eligible families. A redirection to preference type 2 over type 1 errors.

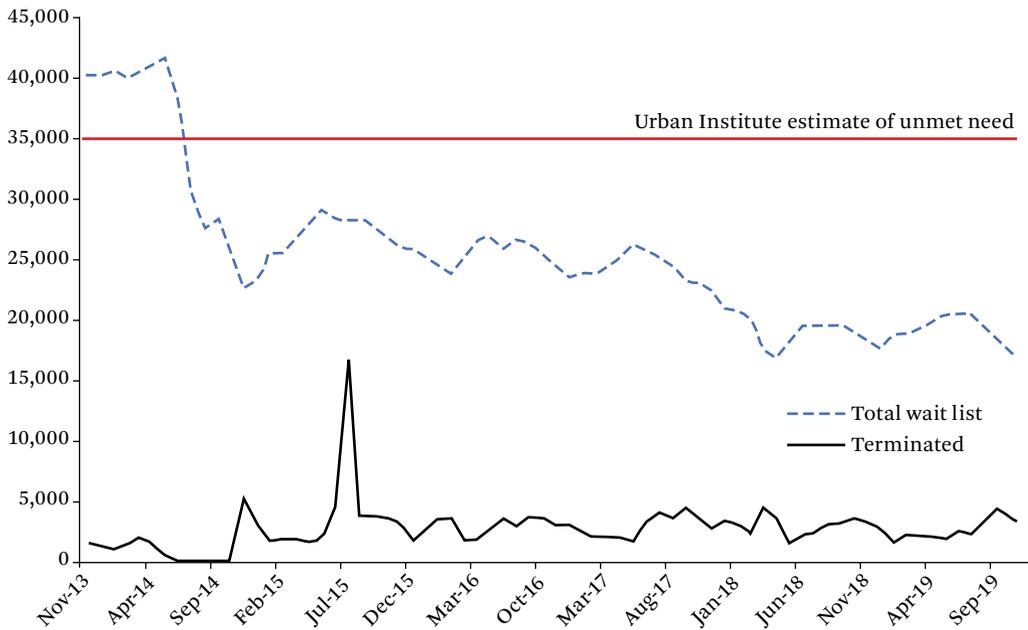
In 2014, with the list about forty thousand cases deep, the early education narrative in state politics also flipped. The following fiscal year, Patrick asked for a reduced \$15 million for childcare access expansion, his goal dropping from universal to 1,700 children (Simpson 2014). Although the EEC had historically leveraged its long and growing wait list as a reason for increased funding, the list itself, rather than the possible unmet need it represented, appeared to remain the problem. Soon after taking over agency leadership in late 2013, then Commissioner Weber acknowledged the wait list as "one of the most politically salient and known aspects of [the] EEC."⁵ Within months, the former commissioner had assembled an internal task force to review the wait list procedures. The recommended "enhancements" included expediting the removal of families from the list, shortening the duration for reinstatement, and "establish[ing] a consistent process for 'blocking access' to families terminated for cause" (board meeting presentation, April 8, 2014). The cause, however, is often an inability to pay even the subsidized fee. In short, despite agency protests over the validity of the data a year earlier, the list came to symbolize the agency's incompetence rather than valid need.

That summer, the EEC undertook, "the additional initiative to perform a Waitlist Cleanup project," which the agency internally described as "aggressive" (board meeting minutes, September 11, 2014) and which would involve "purging the list of families who are no longer interested in care," (Isaacs et al. 2015, 52). To accomplish this, CCRR employees were tasked with contacting all families remaining on the list. First, a confirmation letter was sent. Two telephone calls followed, one mandated to be during nonbusiness hours. If families did not respond to the letter or the calls within thirty days, they were dropped from the wait list. Between April 2014 to August 2014 alone, the number of children on the wait list dropped further—from 41,028 to 27,593 (Isaacs et al. 2015, 103).

By 2018, with a cleaning ritual firmly em-

5. Board meeting minutes, April 8, 2014.

Figure 1. Children Active and Terminated Monthly from State Wait List for Subsidized Childcare, Massachusetts



Source: Author's tabulation based on EEC administrative data.

bedded in agency practice, the wait list had dropped to approximately fifteen thousand children (figure 1), the same as it had been in 2005 and where it more or less remains, oscillating monthly between fifteen and twenty thousand since. The cleanup is preserved as a bullet-point accomplishment on the state auditor's landing page and the wait list has mostly dropped from agency discussion. Whereas access expansion and specifically wait list numbers had been a recurring theme in board meetings between 2012 and 2015, mentions declined precipitously in 2016. By 2017, the term was mentioned only three times, twice from members of the public who continued to express frustration over the time families were on the list and waiting for subsidized care, a figure that to my knowledge has not changed.⁶ The state appears to have already made a hard pivot away from access expansion as a goal: "Board Member Wasser Gish noted that the [House Budget update]

presentation assumes that since voucher access is closed, there will be an attrition of the number of vouchers. Deputy Commissioner Concannon responded that the House did not fund wait list remediation, and the intention is not to increase access."⁷

IMPLICATIONS FOR ACCESSIBILITY

Social statistics introduced as a form of performance management, like the wait list, can on the one hand offer opportunities for a more efficient public sector. Cleaning the wait list could theoretically make it a more useful administrative tool for effectively distributing public resources. On the other hand, when performance measures become more important than the behavior itself, unintended consequences can follow (Moynihan 2009). Whatever the motivation behind the wait list purge, of greater concern here are the consequences. In the following two sections, I describe how the introduction of incremental wait list bur-

6. Board meeting minutes, October 10, 2017.

7. Board meeting minutes, May 10, 2016.

dens now shape families' access to subsidized childcare at the individual and organizational levels.

Many Points of Termination

Since the purge, the agency's wait list cleaning practices have proliferated. Families now must respond to the agency's annual confirmation letters—telephone calls are no longer made—and letters of childcare offers from the CCRRs and the subsidized providers to remain on the wait list. When the latter will be sent, how many a family might receive, or where the letters will originate cannot be determined. Generally, two pathways lead to termination.

First, families may be offered a voucher from the CCRR. To receive the voucher, they must respond to the offer within fifteen days of the date of the letter to make an appointment with a caseworker. If they are successful, they must secure care on their own but do so within thirty days, after which funding is not guaranteed and they may be placed back on the wait list (Weber 2019). If they fail to respond, they will be dropped. If dropped, they can appeal and be placed back on the list if they contact the EEC within thirty days of removal.

The second way families can be removed from the list is through offer letters for contract slots, which are subsidized slots contracted to specific childcare centers or home-based providers. These offer letters are sent directly from the provider with the open contract slot to families and again families must respond within fifteen days of the letter's being processed. The key here, however, is the number of letters sent. For every slot that the provider has open, five letters must be sent per EEC rules. The first family to respond will get the slot, but the other four families must still acknowledge receipt of the letter. If they do not, they are considered inactive and removed from the list. Hannah, an enrollment manager of a large system of subsidized providers, explained: "I'm gonna go into the wait list. I'm gonna put in that I have twenty openings. The system sends out five times as many letters as you have openings. . . . [If] nobody responds—it could be that it was a wrong address, it could be any reason—they don't respond, the system terminates in thirty days. They don't go back

to the bottom of the list. They're terminated. They're not anywhere at this point." Consequently, parents could be required to respond to multiple letters a year all without ever actually securing a subsidized childcare slot.

When a parent fails to respond to one of these letters within the agency's required time frame, whether they want the placement or not (families are permitted to turn down contract slots up to three times before being deactivated), they are deemed no longer interested in services and removed from the wait list. One of the central problems with this type of wait list cleaning, of course, is in the interpretation of families' interest, which misaligns with both current scholarship on the daily tumultuousness of poverty and administrators' own understanding of their clients. As Hannah described, the risk of wait list expulsion is highly correlated with stress and vulnerability:

Families that are applying for the subsidies have a lot going on in their lives. I always say like, I don't have kids. I'm not living paycheck to paycheck and I can tell you that when I come home at night and I grab my mail, I often don't go through it for a while. And now you think about a family who is a single parent, trying to manage two jobs, a lot of stress, a lot of trauma. . . . I don't really expect that they're going through their mail at night.

In this case, not going through one's mail at night could translate into termination from a years-long wait list. Rosa, a CCRR employee, agreed. She said that, in fact, the letters often never reach their intended families. Sometimes they are returned to sender. Other times clients claim that their mail has been tampered with. In some cases, the letters may never have been sent at all. The same state audit investigating the integrity of the list also found that, at the time, up to 15 percent of confirmation letters were not mailed in the first place due to a KinderWait technical glitch.

The past decade of social welfare scholarship substantiates Hannah's and Rosa's reading of the field. Given the residential transiency of vulnerable American households (Desmond 2016), lost letters are not at all implausible. Studies of welfare bureaucracy consistently

document communication as problematic to beneficiary access (Edin and Shaefer 2015; Gustafson 2011). Telephone calls may be unsuccessful. Among the mothers I met in the course of this wider project, many used temporary or disposable phones that are more economical. Victimized women, who are also more likely to experience poverty and need institutional support, may make intentional changes in their daily routines and contact information to avoid current and past abusers (Bjerregaard 2000; Vest et al. 2002). When families are not reachable, it is as likely a sign of incremental vulnerability as one of disinterest.

Consequently, providers suspected that the agency's newly adopted wait list integrity practices were inadvertently terminating eligible families for subsidized childcare and resulting in a wait list that severely underestimated unmet need. Again, Hannah, the enrollment manager for a large group of subsidized programs explained it this way:

You hear about like how the wait list is twenty-five to thirty thousand. And I think that it really has significantly gone down but I also think that it's not necessarily because we're serving more kids. I think there's a lot. . . . so, I mentioned to you about the 20 percent, right? The five times as many letters. We don't fill twenty subsidies when we send a hundred letters. And I think that's across the board. There's some that are falling off the waitlist 'cause they never contacted, which in my opinion is the majority of them. I think most don't call. And I think that there's reasons. . . . I think people are busy. I think people have challenging lives and this is a very vulnerable population. Those families need their hands held a little more.

Hannah's opinion is also fact. Administrative data from the EEC show that the majority of wait list terminations—on average two thousand a month and in total nearly 140,000 between July 2014 and December 2019—were a consequence of families not responding to funding offer letters from providers.

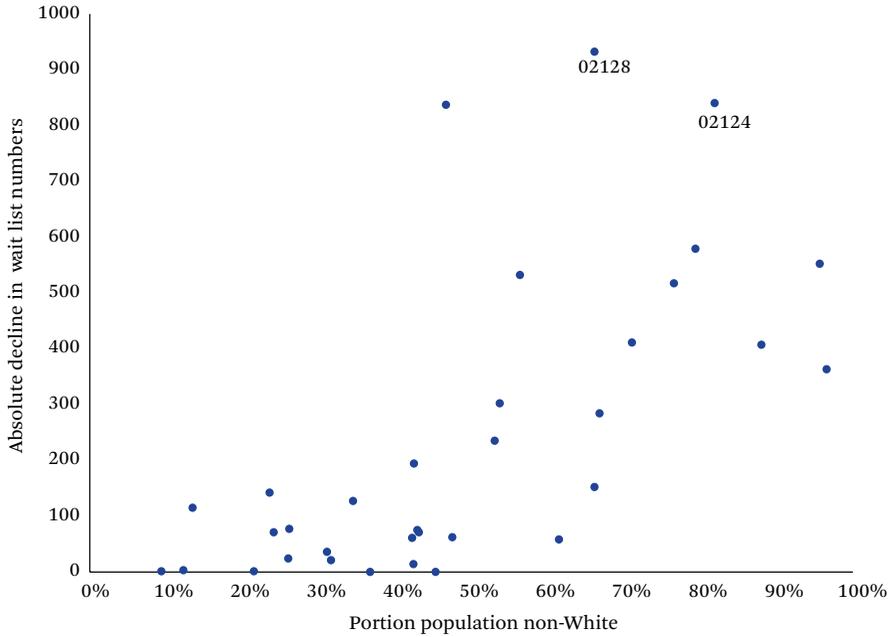
Perhaps most consequentially though, EEC data suggest that these risks have not been equally distributed. As expected, the need for

subsidized childcare in Boston is greatest in lower-income, predominantly non-White communities (Campbell and Patil 2019), where wait lists also tend to be longest. Analysis of year-over-year wait list changes among a sample of thirty-four zip codes that make up Boston proper showed that some zip codes have experienced higher rates of decline than others and that absolute declines in wait list numbers tend to increase as the portion of non-White residents (figure 2) and population living under 200 percent of the official federal poverty level increases (figure 3). Models demonstrating a robust correlation are beyond the scope of this article, but the scatter plots clearly visualize the unequal and intersectional impact of the wait list and its burdens.

Analysis of absolute wait list declines at the zip code level reveal similar patterns (figure 4). The zip code with the greatest absolute decline, 02128, covers East Boston, a well-known and longtime Mexican and Central and South American immigrant enclave with 36 percent of the population earning below 200 percent of the official federal poverty line. From 2013 to 2018, the number of cases on East Boston's wait list fell from more than one thousand, one of the city's longest lists, to just 146—an 87 percent drop that placed the zip code nearer to the median list length. It is possible that a language barrier contributed. Funding offer letters for contract slots can now be sent out in five languages, including Spanish and Portuguese, but prior to 2016 funding letters were only in English. East Boston experienced almost the entirety of its decline in waiting cases between 2013 and 2016, after the purge and before the language choice policy.

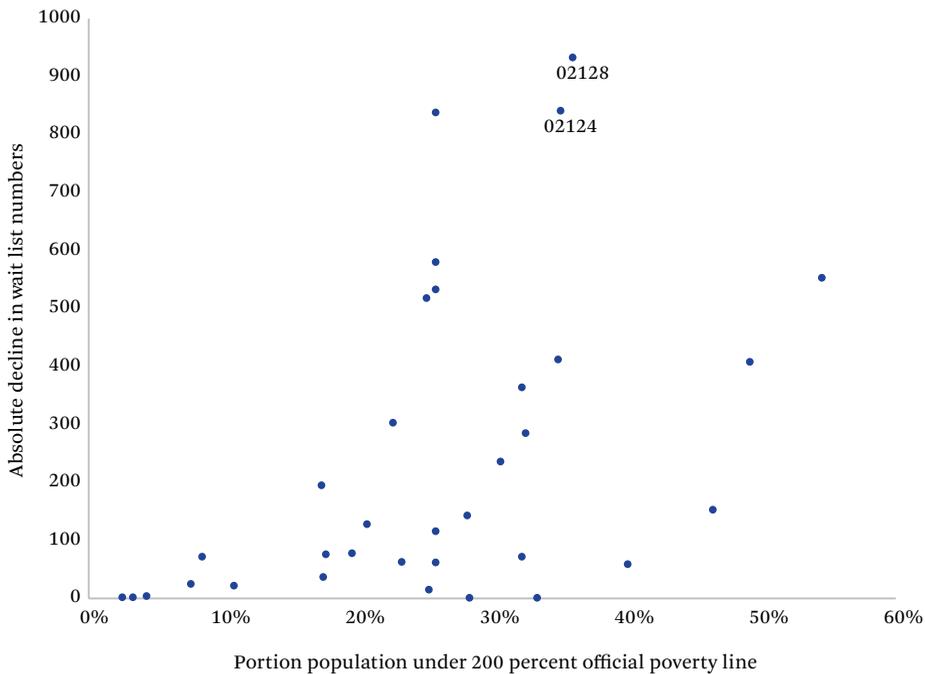
The zip code with the second highest absolute decline in the city, 02124, covers Dorchester, a community that is 82 percent non-White, 53 percent of residents identifying as non-Hispanic Black, and one of the most segregated communities in Boston. The most recent American Community Survey data report 8 percent of the zip code's population in deep poverty. Between 2013 and 2018, the zip code's wait list fell from more than 1,100 to just 277 cases, remaining the city's longest but by a much smaller margin. Combined, these two zip codes make up 22 percent of the city's total decline in

Figure 2. Decline in Wait List by Portion Non-White Among Boston Zip Codes, 2013–2018

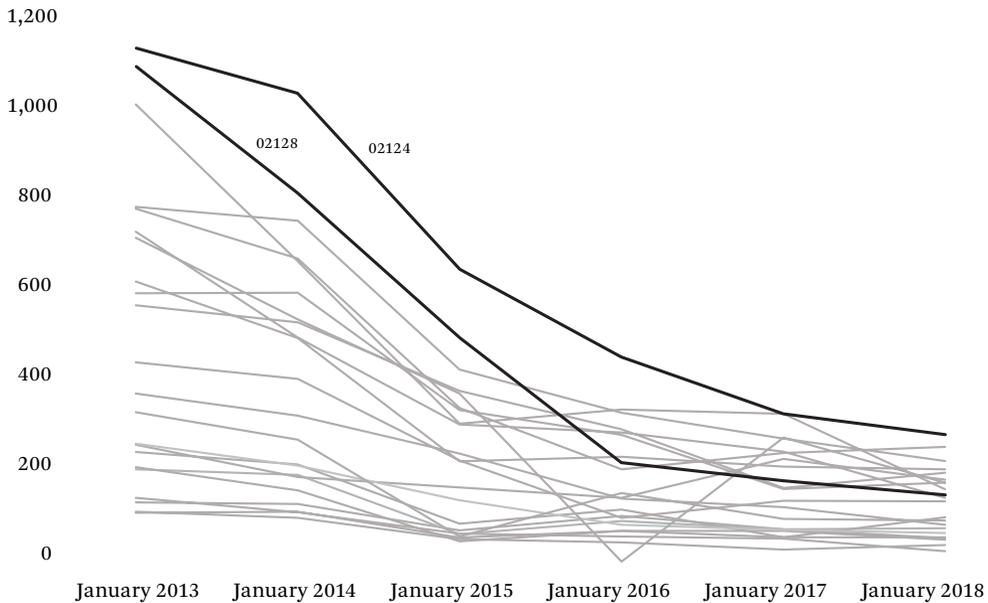


Source: Author’s tabulation based on EEC administrative data and American Community Survey data accessed via NHGIS (Manson et al. 2022).

Figure 3. Decline in Wait List by Poverty Among Boston Zip Codes, 2013–2018



Source: Author’s calculations based on EEC administrative data and American Community Survey data accessed via NHGIS (Manson et al. 2022).

Figure 4. Wait List Cases by Zip Code, Boston

Source: Author's tabulation based on EEC administrative data.

wait list numbers. Although more research is needed, my findings suggest that for poor and racialized families living within poor and racialized communities, the wait list may amount to a double jeopardy: most likely in need of care, these same families may need to wait the longest and face the greatest risk of termination; a disturbing finding considering the racialized history of welfare reform.

In December 2019, the wait list hit a new low. State-commissioned research suggests that this number—fifteen thousand—falls far below the true unmet need for subsidized childcare (figure 1). Per the auditor's report that prompted the original purge, wait list numbers at the time were overstated by 36 percent, suggesting a more accurate wait list figure of thirty-seven thousand to thirty-eight thousand children. A third-party policy report commissioned by the EEC found similar results. In 2015 the Urban Institute published the "Child Care Needs of Eligible Families in Massachusetts" (Isaacs et al. 2015). Their estimate of unmet need using demographic rather than wait list data was approximately thirty-five thousand children. If the wait list was bloated in 2013, these reports suggest that it is now anemic. Meanwhile, the

total number of caseloads served—53,405 in December 2011—has remained virtually unchanged: 55,607 caseloads served as of December 2019. Like Hannah said, the wait list has "significantly gone down but . . . it's not because we're serving more kids."

Overburdened, Underutilized Providers

"We don't touch the wait list." "You don't?" "No. We just work with the shelter. A family enters shelter, their caseworker knows to put them on our wait list if they're seeking care." Nancy, the director of a small group of entirely subsidized centers, had been working in childcare for decades. Before she was a director, she had been a teacher. She knew how to operate a center and according to her it was not by filling her slots through the wait list.

To run an entirely or even a partially subsidized childcare center is to run an efficient organization, akin to what Josh Seim (2017) calls a "lean fleet"—a subsidized social service entity nudged into market efficiencies through fiscal austerity. Subsidized providers are only paid a portion of the market rate, typically less than 75 percent, and only for the slots they fill. Consequently, their financial model depends

on capacity. Whereas families with vouchers have to secure care on their own, Nancy explained that “the contracted spaces, that’s up to us [the providers] to fill those.”

To fill their contracted slots, providers are supposed to mail funding offer letters to families on the wait list, as reviewed in the previous section. Ironically, though, this same mechanism resulting in the majority of family terminations—the funding offer letter—is also problematizing providers’ slim financial margins in ways that make operations difficult. For Nancy, it was unsustainable:

I think the real fact of the matter is, when they went to the statewide wait list, everything is done by snail mail. You pull a name off of this statewide wait list. You have to mail them a letter saying “I have a spot for you.” It can turn into a six-week process. Meanwhile, the spot is sitting empty. You’re not getting any funding for that spot. But your expenses don’t change whatsoever. . . . We couldn’t afford to work like that. Half of our building would be empty all the time.

The only way to operate her center, she told me, was to maintain 90 percent capacity, and the only way to do that she said was to bypass the state wait list altogether.

From this perspective, the wait list cleaning makes sense. Keeping the wait list screened and cleaned could streamline the process of filling slots. The more families on the list who are eligible and active, in theory, the higher the success rate of placing a family should be and the less likely the need to churn through the list. Providers had been struggling with underutilization for years. Enrollment directors at large subsidized programs as of 2016 and 2017 were reporting a roughly 75 percent use rate across the field, meaning that approximately 3,750 contract slots across the state were sitting empty at any one time. Having a reliable pool of families from which to pull should help curtail placement times and reduce the number of open slots. But again, use rates had declined since 2013–14, when they were closer to 90 per-

cent, suggesting that the wait list cleanse, if done for this reason, was not working.

Eligibility alone was not the only thing slowing parents’ placement into slots. For some providers, like Allen, another director of subsidized centers, the absence of flexibility in *how* he filled his slots was taking a toll: “I don’t have any control of who I can put in [my centers], so now I’m losing all my childcare slots. . . . The state decides who gets the slots basically, not me . . . and the fee-paying parents don’t want to put their kids in public housing projects. So those slots often go unfilled. We have to wait, it takes weeks. We send somebody up and they go, “I like the center, but I don’t like the neighborhood.””⁸

Although the wait list had been introduced to distribute subsidized care more fairly, not all providers were perceived equally. In prior decades, Allen had served almost exclusively families from the surrounding public housing units. Now he had to work through all the families uninterested in but assigned to his space via the wait list before finding someone to take the slot. Even so, families do not commonly refuse slots. The problem seemed primarily in the drawn-out processing and mailing and waiting for responses from the offer letters.

To manage these burdens, providers I spoke with were sometimes adopting alternative and extra-institutional strategies. Some skirted the wait list or ignored it, such as Nancy, instead pulling families directly into their centers. Others, like those surveyed by the EEC during the 2013–14 fiscal year, substituted voucher-holding families who have more market agency and can enroll more quickly and even private paying families for those on the wait list: “Some [providers] said they can’t afford to keep a [contract] slot open when they have a waitlist of private payers. Others said that when a family with a voucher comes, they don’t want to turn down the income. At the same time, they can only afford to have a certain number of subsidized spots so the voucher family goes into what would otherwise be an open contracted slot.”

When providers place voucher-holding families into contract slots, the voucher is forfeited

8. Subsidized childcare operates on a sliding scale according to household income with a maximum weekly payment of \$283 for a family of four and minimum of \$0.

and, providers suspected, not always put back into circulation. What should have been two subsidized slots becomes one. When providers fill a contract slot with a private paying family, the subsidy is gone altogether. Although providers recognized the harm in these practices, they often felt they had no other choice, as was the case with Leann, the executive director of a group of subsidized centers. I asked, “if you don’t fill all [your contract slots], can you fill those slots with private pay [families]?” “Yeah, we don’t like to, but we would.”

Combined, these reports point toward a field closing in on itself. Administrative data suggest the same. Between 2012 and 2017, the state lost 289 subsidized programs (Bouek 2022). Many simply closed. Others appear to just be transitioning out of the subsidized system: “Sharon jumps in to offer that the last program she worked for didn’t renew their DCF or subsidized slot contracts. They were operating on a \$70,000 per year gap. It was a financial decision.”⁹ For subsidy-reliant families, though, the effects are the same: one fewer provider for them and their children.

Last, the underuse of contract slots for providers meant a dearth of funds. For the state, though, it meant a surplus. Hannah explained: “Every quarter let’s say we have three million dollars’ worth of [funding for contract slots] and we’ve only been using like two and a half million because, well they’re [the slots are] not all being used. We only bill the state for what we use. The state, every quarter, says okay we’re taking back three million dollars. Not really taking money back ‘cause we never had it but they’re re-allocating it. They re-allocate the money.”

In fiscal year 2014, more than \$3 million of the agency funds budgeted for income eligible access remained unspent (Commonwealth of Massachusetts 2012). In 2015, the figure reached nearly \$11 million, complicating the narrative of austerity. At the time, the excess funds were reverted to the state general fund, a practice that was eliminated in 2017. Now, earmarked unspent income eligible funds can be rolled into access expansion for prioritized groups and unspent agency funds are redirected to

providers in the form of workforce salaries and quality grant funding.

Still, no one I spoke with knew exactly how the surplus funds had been reallocated before the policy change. As Hannah contended, maybe this was beside the point, because the point was that the funds were not being used for families in need: “The reality is there’s this money pool that has been allocated for our programs for families, right, which is the ultimate goal, that isn’t being used. . . . My point in saying this though, is there are open contracts out there. We have a ton of open contract slots. We have so many more children we could help serve but it’s really, the waitlist system can be very challenging.”

DISCUSSION AND CONCLUSION

Tressie Cottom (2020) writes about the contemporary workforce as a hustle economy. One might easily apply the same descriptor to the social welfare state in which “failure to obtain needed services is no longer the fault of the state but rather the failure of the individual to transact effectively in the market” (Hasenfeld and Garrow 2012, 307). Still, the mechanics and the politics behind the hustle—in this case the wait lists—are less well understood. Because wait lists exist within a space of limited to no public oversight, they are ideal sites for the “opaque” or “subterranean” policymaking that underlies the hustle (Hacker 2004; Herd and Moynihan 2018). Understanding how and why wait lists are managed within this relatively hidden realm is therefore fundamental to understanding issues of access.

This article makes one such contribution. Drawing on the recent case of Massachusetts’ declining subsidized childcare wait list, I explore the idea of the wait list as an overlooked but consequential venue of administrative burden. Within the context of fiscal austerity and in the realm of a “new politics of care” (Hasenfeld and Garrow 2012), wait lists have emerged across the country and for a multitude of social services. I identify them, rather than or in addition to wait lists serving as official documentation of waiting families, as important sites of discretionary decision-making by un-

9. EEC advisory council meeting fieldnotes, March 24, 2017.

derlining their dual significance as performance measures. In the present case, because the wait list itself became symbolic of agency competence, leaders' attention shifted toward managing the list rather than the problems the list represented. The list's integrity was ultimately restored and questions of agency competence seemingly cleared, but all at the ongoing expense of vulnerable families and well-intentioned providers and without ever actually expanding access, the original intention behind the budget request that triggered the audit.

More broadly, the research here contributes to a conversation on the political efficacy of wait lists as social statistics. Wait lists can support fair and transparent governance. They can also be invoked, however, as symbolic references to effective governance, particularly in situations when political pressure is high but resources low (Jacob and Levitt 2003). Administrative burdens in this context can operate like a hidden valve, quietly speeding or slowing the appearance of demand and unmet need. In Massachusetts, the purging and cleaning of the subsidized childcare wait list over the last nine years has taken place almost entirely outside public scrutiny. The only place these terminations have been documented are in the appendix of the EEC's annual legislative reports, a practice that ended in 2017. Now they are nowhere. We might, then, begin to understand wait lists as a distinct form of statecraft that can be employed to actively manage the optics of need by "disappearing social crisis," altogether (Lara-Millán 2021). As Hannah, the enrollment manager, explained, when clients are deactivated from the list they become "not anywhere." In some ways then, Hannah's point might suggest Massachusetts as a least-worst approach. Other states have no wait lists, not because there is no unmet need, but because maintaining a list is overly burdensome for the state. What does it say about the social value of a need when there is no attempt to measure it?

No matter the motivation for the burdens, most consequential are their effects. Here I find that the introduction and intensification of burdens had an outsized impact on majority Black, Hispanic, and immigrant communities, and most likely mothers, emphasizing the in-

tersectional significance of burdens. My findings also highlight the importance of tracing burdens into the organizational sphere. As work in this double issue demonstrates, third parties can function to remediate or intensify burdens for clients. But, as Lilly Yu (2023) illustrates with her case of immigration attorneys, third parties can also be *recipients* of burdens. Within a social safety net that depends on private contractors for service distribution, these burdens can have real and material implications for citizen access, suggesting the field itself as a third and possibly variable layer of inequality between bureaucrats and their divergent policy contexts (Michener 2018).

My results here are limited in that they can only speak to one wait list operating in one state for one program during one political-historical moment. In fact, in some states, over the same period, subsidized childcare wait lists grew, remained stagnant, or were eliminated altogether. Do these cases represent success or failed public policy? One of the most politically valuable aspects of the wait list is in its transmutability: that it can be whatever the state and its actors need it to be. Future work might well consider case studies of wait lists or the absence of wait lists in other states and municipalities as well as those operated by public rather than private entities. Beyond wait lists, the idea of purging eligible populations is present in other consequential contexts, such as voter rolls and state health-care coverage for children (Kelman and Reicher 2019). The conditions under which these purges take or do not take place and how can be informative as to their utility as venues of policymaking.

Also missing in this article are the narratives of parents navigating the wait list. Preliminary data from my ongoing interviews with mothers of young children suggest that their experiences are just as opaque as the rules governing the list. Several were uncertain about their eligibility, whether they were on the wait list, and how to confirm their status. Their uncertainty should lead us to question the gendered and racialized distribution of the burdens outlined here. For mothers who are simultaneously navigating life with small children, poverty or economic marginalization, school or employment or both, and many doing so without reliable

access to transportation, the ambiguous administration of a wait list coupled with a high risk of termination for a social service critical to intergenerational mobility suggests a moral failing of the state.

From a policy perspective, opportunities are available. As providers suggested, brief open enrollment periods during which families could bypass the wait list and go directly to the provider of their choice are one. This would not only work to address the issue of underutilized contract slots, but also of the geographical restrictions that most families were unaware were being imposed on them. Allowing families to rank preferences outside open enrollment could also help alleviate providers' efforts to fill slots and possibly reduce the onerous 5:1 letter to slot ratio. Last, and if nothing else changes, the EEC should consider increasing funding to the CCRRs as an immediate way of expanding access and creating a more inclusive process. CCRR employees cite receiving "100 voicemails per day" and that they are unable to respond in a "timely and efficient manner."¹⁰ For those unable or ill equipped to navigate the wait list platform on their own, calling the agency or CCRRs may be a natural next step. Ensuring that families can access the list without technical expertise is imperative to the program's inclusivity. In any case, we should remember that administrative burdens are a choice, with some programs having significantly fewer than others (Herd and Moynihan 2018). The EEC made a choice nearly ten years ago to implement additional and more restrictive burdens. Similar choices could be made now to repeal or reduce them.

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PART V

Disaster and Housing Relief

Administrative Burdens in Emergency Rental Assistance Programs



CLAUDIA AIKEN^{ORCID}, INGRID GOULD ELLEN^{ORCID}, AND VINCENT REINA

Since the onset of the COVID-19 pandemic, localities across the United States have been given unprecedented short-term rental assistance funding and considerable flexibility in its distribution. The emergency nature of these programs suggests that the administrative burden placed on participants should be lower than in typical rental assistance programs such as the housing choice voucher program. Yet there are several features unique to housing, such as the double take-up challenge of engaging both tenants and landlords, that persist. This article draws on national surveys of more than two hundred emergency rental assistance programs, surveys of thousands of tenant and landlord applicants, and interviews with ten program administrators to investigate the degree and sources of administrative burdens in these programs.

Keywords: emergency rental assistance, administrative burden

Researchers from multiple disciplines have highlighted how administrative burdens can limit citizens' access to services and benefits, even when they are eligible (Currie 2004; Peeters 2020; Schwabish 2012). As a result of these burdens, take-up rates for entitlement programs, such as the Supplemental Nutrition Assistance Program (SNAP) and Medicaid, are well below 100 percent (Herd and Moynihan 2018). In 2017, for example, 82 percent of the

eligible population received SNAP (Cunnyngham 2020). Further, some research suggests that these burdens tend to fall most heavily on those with the fewest resources (Cherlin et al. 2002). Although we do not know the share of eligible households that apply for federal rental assistance, the latest national study found that among those who successfully apply and receive housing choice vouchers, 61 percent are able to use them within 180 days (Ellen,

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O'Regan, and Stochak 2023). Yet surprisingly little literature focuses on the administrative burdens within housing programs.

It is arguably even more concerning when administrative barriers limit access to critical public services in the face of emergencies. We study the emergency rental assistance (ERA) funds authorized by a pair of COVID relief bills in 2020 and early 2021. In this case, the federal government provided an unprecedented amount of short-term, emergency support to help the millions of renters facing pandemic-related income losses to pay back rent to their landlords and thus stay in their homes. State and local administrators faced enormous pressure to get money out the door quickly and into the hands of tenants. Despite this pressure, and the evident need, the administrative burdens were formidable in many places, and the funds flowed slowly. Although some of the burdens in ERA programs are similar to those in other social programs, others reflect the unique nature of housing assistance.

Understanding the administrative barriers that hampered the flow of ERA funds can help inform policymakers crafting such emergency assistance in the future. This article's critical analysis is relevant for both emergency and more permanent housing assistance programs. Finally, the variation in ERA implementation is considerable across some 450 distinct state and local programs. As a result, some jurisdictions may have been able to implement program innovations that reduced administrative burdens for renters, and others may have adopted program structures that resulted in greater burdens. This variation also provides important insight into administrative burdens in other federal programs that allow considerable operational flexibility at the local level.

This article has several objectives. First, we develop a framework for understanding administrative burdens in the context of rental housing assistance programs. We highlight the fact that unlike other social programs, rental assistance programs typically require double take-up. Tenants must not only successfully apply, but their landlords must also agree to participate and comply with program requirements, which heightens administrative barriers.

We then examine and describe the adminis-

trative burdens associated with ERA programs across the country, drawing on surveys of program administrators, landlords, and tenants as well as structured interviews with program administrators of ten state or local programs: California, North Carolina, Minnesota, Atlanta, Boston, Chicago, Los Angeles, Philadelphia, Portland, and San Antonio.

Third, we explore the roots of these requirements. We analyze what administrators reported about their motives for imposing and relaxing requirements, if they did. Some researchers view administrative burdens as strategies to reduce demand for services (Lipsky 1984; Herd and Moynihan 2018). Others depict them as "red tape" that results from administrative carelessness or inattention (Bozeman 2000). Still others view them as a way to reduce overpayment and fraud (Brodtkin 1987; Hanratty 2006). We argue that in the case of emergency rental assistance, these burdens seem to be more a function of concern about potential federal audits and the need to collect data for reporting to a higher level of government, combined with limited data infrastructure and capacity to design and implement what were typically new and significantly expanded programs. Some of these findings are specific to emergency assistance, but they also reflect the need for policymakers to assess and address administrative burdens that exist in long-standing housing programs.

ADMINISTRATIVE BURDENS IN RENTAL HOUSING PROGRAMS

Pamela Herd and Donald Moynihan (2018) usefully identify three distinct types of administrative burdens: learning costs (hurdles to learning about a program or service and how to apply for it), compliance costs (costs of providing documentation to demonstrate eligibility and complying with other rules and requirements), and psychological costs (the stigma and emotional stresses that come from applying for social support).

Administrative burdens limit the degree to which eligible people actually receive the assistance they need. Some burden may be inevitable to limit fraud, ensure that only eligible applicants receive assistance, and prioritize assistance to those most in need. The impacts

of these burdens are not felt evenly, however. Albert Nichols and Richard Zeckhauser (1982) posit that only the neediest will be willing to tolerate the hassles of applying, but empirical work suggests that people with fewer resources and less human capital are least able to negotiate burdens. Burdens thus tend to weed out poor households, immigrants, and households of color more than other eligible households (Aizer 2003; Herd and Moynihan 2018).

Administrative burdens in rental housing assistance programs have been understudied, yet the administrative burdens surrounding housing assistance programs are likely to be more significant in many ways than those associated with the other social programs that have been more studied, such as Temporary Assistance for Needy Families and SNAP.

The main form of rental assistance in the United States is the housing choice voucher program, which provides assistance to approximately 2.3 million households (Center for Budget and Policy Priorities 2021), 70 percent of which are households of color (Reina, Aiken, and Epstein 2021). Unlike most other federal rental assistance programs, the subsidy is not tied to specific housing units; instead, voucher holders use the subsidy to help defray the cost of renting homes on the private market. Voucher recipients generally pay 30 percent of their income toward rent and the local housing authority pays the balance up to a specified local payment standard. States and localities can also use their federal HOME grants to support tenant-based rental assistance. Research shows that tenant-based rental subsidies reduce the rent burdens of low-income households, allow them to live in less crowded homes, help them to avoid homelessness, and improve children's performance in school (Mills et al. 2006; Schwartz et al. 2019). Administrative burdens, though, limit their promise.

Households applying for rental assistance programs confront learning costs, compliance costs, and psychological costs. In terms of learning costs, many eligible renters may not even know about rental assistance. They must find out from neighbors, friends, nonprofit service agencies, or case workers about the availability of assistance and then figure out where and how to apply for it. The shortage of rental

assistance is well documented: only one household of every eligible five receives it (Reina, Aiken, and Epstein 2021). As a result, wait lists for Section 8 vouchers are quite long in many jurisdictions, and some housing authorities only open their wait lists to new applicants for short periods. When the County of Los Angeles opened its voucher wait list for the first time in more than a decade in 2017, households were given only two weeks to learn about the opportunity and submit an application (HACLA 2017).

Once a household does apply, it faces significant compliance costs in completing applications and producing the necessary documents. Applicants must provide documentation to demonstrate their eligibility for the program, including proof of citizenship or immigration status, family income, assets, expenses, and family composition (which involves producing birth certificates of each child in the household). Housing authorities use this information to determine eligibility, the size of the home applicants can rent, and the amount of housing assistance they can receive. If an applicant secures a spot on the wait list (in Los Angeles, only twenty thousand of the 170,000 applicants who applied in 2017 were selected for a spot before the wait list closed once more), to stay on it they must continually report changes in address and contact information to the housing authority. Given the high level of housing instability of low-income households, such policies disadvantage the most vulnerable applicants (Kim 2020). Finally, if a household actually receives and uses a voucher, they must agree to meet with housing authority officials on an ongoing basis to recertify their income to demonstrate that they are still eligible and, when incomes change, to reset their subsidy level.

Households applying for rental assistance are also likely to experience psychological costs. First, considerable social stigma is attached to low-income rental assistance and its recipients. Many consider it a handout. Many landlords distrust and avoid tenants with vouchers, viewing them as more likely to be late on their portion of rent, damage properties, or be disruptive to neighbors (Garboden et al. 2018). Philip Garboden and his colleagues

(2018) find that between 21 and 45 percent of surveyed landlords viewed voucher holders as “worse” tenants than others. Households may resist applying for rental assistance to avoid such negative treatment. Interactions with the housing authority may also raise broader concerns about the way the government will use their data, often a significant concern for immigrant households (Aiken and Reina 2021). Last is the long wait and uncertainty in many areas about whether and when households will actually receive a voucher. In many places, wait lists are so long that applicants wait years to receive their voucher. To our knowledge, no studies on the psychological toll exacted by this burdensome process have been undertaken.

These administrative costs are not dissimilar from those of other social programs, though the wait and uncertainty surrounding vouchers is far greater. Further, unlike in many other social programs, a second stage of take-up involves households successfully using their vouchers. It begins when a voucher is received. The household then has a limited time to find a unit that both meets the program’s quality standards and entails a rent that the local housing authority deems reasonable given the local market. Many are unsuccessful. The latest evidence suggests that only six of every ten households that received a voucher in 2019 managed to rent a unit within 180 days, and the search duration was especially long in tight housing markets (Ellen, O’Regan, and Strochak 2021). Other studies show voucher take-up to be still lower among vulnerable subgroups, including unemployed, people with criminal histories, older adults and Black households (Chyn, Hyman, and Kapustin 2019; Reina and Winter 2018).

The challenge of actually using a voucher after receiving it can be considered a fourth type of administrative burden, which Carolyn Barnes (2021) calls the cost of redeeming assistance. She focuses on the hurdles that recipients of SNAP and WIC (Special Supplemental Nutrition Program for Women, Infants, and Children) face in using their benefits, but rental assistance recipients also face significant redemption hurdles because they bear the time and transaction costs not only of applying for assistance but also of searching across multiple units until an owner accepts the assis-

tance contract. Landlords must agree to house tenants with vouchers for an ongoing period (typically at least one year), face significant administrative hurdles in getting housing authority approval to rent their unit to voucher holders, and must agree to annual inspections on an ongoing basis. If rental assistance recipients are unsuccessful in finding a willing landlord, they lose access to the subsidy.

Another way to frame this fourth leg of administrative burden is that rental assistance programs require double take-up, that is, the participation of both tenants and landlords. Many landlords resist housing tenants with vouchers because of some combination of social biases about voucher holders, low rent subsidies relative to the market, lack of familiarity and administrative burdens (Cunningham et al. 2018; Garboden et al. 2018; Rosen 2020). Mary Cunningham and her colleagues (2018) describe how landlords reference administrative burdens in refusing to accept vouchers, for example saying, “Section 8 is too much work,” or that vouchers give them “a headache.” Other research points specifically to the voucher program’s annual housing inspection requirements as a barrier to participation. More than half of the landlords Garboden and his colleagues (2018) surveyed in Cleveland and Baltimore described annual housing quality inspections as “burdensome and costly.” Nearly half reported that interactions with their local housing authority were a “negative factor” in affecting their decision about whether to agree to house voucher holders.

Beyond the rental assistance programs themselves, some landlords may also worry about the ongoing costs associated with engaging with the government. Accepting tenants with vouchers may require landlords to register their properties with their city as formal rentals, which could invite additional scrutiny and taxes. It is also possible that landlords wish to avoid the stigma or market signal of serving voucher holders, worrying that it may dampen demand for their properties over the longer term.

Further, on the landlord side, compliance costs mean that it is often only worthwhile for landlords in high-poverty neighborhoods, who cannot attract market tenants able to reliably

pay “fair market rent,” to participate (Garboden et al. 2018). As a result, the voucher program tends to exclude voucher holders from low-poverty neighborhoods that may have more amenities, such as high-performing schools (Varady 2010).

Housing authorities typically face little pressure to alleviate these burdens. Because the demand for vouchers so vastly exceeds the available assistance, housing authorities do not need to worry that relatively few households apply or are able to use a voucher; another household is always willing to try (Moore 2016). Stefanie DeLuca, Lawrence Katz, and Sarah Oppenheimer (2023, this issue) show that in the rare cases when housing authorities do take meaningful action to reduce administrative burden, they can significantly improve outcomes, with respect to not only take-up but also location and emotional well-being.

Double take-up barriers are particularly troubling in the case of short-term, emergency rental assistance programs, such as the recent ERA initiatives enacted during the COVID-19 pandemic, when the need for housing support is urgent. Emergency rental assistance is meant to help renters remain in their current homes, not seek new ones. This alters the stakes for applicants; if landlords are granted the ability to opt out of the program, the consequence for participating households is not prolonging their housing search or even losing their opportunity to use the subsidy, but potentially losing their home in the midst of a pandemic.

Despite this, the administrative burdens surrounding emergency programs may be even greater than those associated with conventional rental assistance programs, at least in some respects. Specifically, during broad-based emergencies, learning costs may be higher because emergency programs are often new initiatives and many of the normal channels of outreach may be unavailable. Compliance costs can also be higher when people are experiencing emergencies because it is more difficult for them to produce required documents. Ethan Raker and Tyler Woods (2023, this issue) find, in the case of Federal Emergency Management Agency aid to Louisianans in the wake of Hurricane Katrina, that the compliance costs of gathering documentation were exacerbated by

the “rushed and chaotic conditions” of the disaster. Further, the delay and denial of aid in the context of a disaster resulted in acute psychological distress.

On the other hand, landlords presumably have less incentive to opt out of emergency rental assistance to cover back rent for tenants they have already agreed to house, especially under state and local moratoria prohibiting evictions. Further, because of the urgency of the need, the greater public attention, and the greater pressure to get funds out the door (see, for instance, DeParle 2021 and Zaveri 2021), program administrators or legislators may relax some of the standard application requirements. Finally, arguably less stigma is attached to emergency rental programs enacted during broad-based crises because recipients may be viewed as more deserving, though Jessica Lasky-Fink and Elizabeth Linos (2022) show that stigma is a significant barrier to take-up even in the case of emergency rental assistance.

SUMMARY OF THE ERA PROGRAM

In March 2020, the discovery that the COVID-19 virus had entered the phase of *community spread* resulted in shuttered businesses and schools, leaving millions of American households without the income they needed to pay rent. To alleviate this economic hardship and help people stay in their homes, Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act, which included two funding streams for emergency rental assistance: \$150 billion in Coronavirus Relief Funds (CRF) administered by the U.S. Treasury and \$5 billion in Community Development Block Grants (CDBG-CV) overseen by the U.S. Department of Housing and Urban Development (HUD). These funds were distributed among states and localities according to a combination of traditional allocation formulas and COVID-19 infection rates, and the recipient jurisdictions were given considerable latitude to apply the funds in the way they thought best. Many chose to create emergency rental assistance programs. The National Low Income Housing Coalition had identified 438 such programs, sixty-eight state and 370 local, as of October 2020 (Yae et al. 2020).

Emergency rental assistance has some clear similarities to the voucher program, not surprisingly, given that HUD created the guidelines governing CARES Act funding for emergency rental assistance and thus informed the initial design of many ERA programs. Interviews with ERA program administrators also found that some had modeled their intake processes on those of their local voucher program (Aiken et al. 2021). But variation in design was notable across ERA programs, especially in the first wave. Although some jurisdictions used the funds to expand existing rental assistance efforts, a survey of 220 first-wave programs found that the majority (72 percent) were new, and that most (80 percent) had launched within four months of the CARES Act (Reina, Aiken, Verbrugge, Ellen, et al. 2021). The programs often combined multiple funding streams, including CDBG-CV and CRF dollars as well as local and philanthropic sources. As the pandemic wore on, however, it became clear that the initial infusion of funds fell far short of renters' needs. In late December 2020, Congress appropriated \$25 billion for the Emergency Rental Assistance Program, which would flow to states and localities exclusively through the Treasury Department. The statute governing these ERA1 funds was more restrictive, setting parameters for which households could be eligible for assistance and how many months of assistance could be provided per household, and requiring that administrators seek the cooperation of landlords to accept payments on their tenants' behalf. In the following months, Treasury issued five iterations of guidance to help jurisdictions comply with the ERA1 statute, each time offering a more relaxed interpretation of the requirements. Finally, in March 2021, the American Rescue Plan Act provided an additional \$21.55 billion in ERA2 funds with considerably more flexibility (Reina, Aiken, Verbrugge, Harner, et al. 2021).

According to Treasury Department data, the program ultimately succeeded in reaching many vulnerable renters. During 2021, the program made 3.8 million payments to renters across the country, 80 percent of whom earned less than half of their local area median income. As for race, 59 percent of recipients were Black or Hispanic, slightly below the share for

housing choice voucher holders. It is impossible to precisely benchmark these percentages to underlying need. The Office of Evaluation Sciences (2022), however, finds that Black renters were overrepresented among ERA recipients, based on a comparison between the demographics of renters who received ERA and those of ERA-eligible renters, estimated with census data.

DATA

This article relies on four sets of original data: first, a series of national surveys of ERA program administrators; second, surveys of tens of thousands of tenants who applied for ERA programs in the City and County of Los Angeles and in California at large; third, surveys of landlords whose tenants applied for assistance in Los Angeles; and, last, a set of ten in-depth interviews with ERA program administrators. Together these data offer a unique opportunity to understand the administrative burdens of COVID-19 rental assistance programs for tenants and landlords.

The authors, in collaboration with the National Low Income Housing Coalition (NLIHC), conducted multiple surveys of ERA program administrators, capturing aspects of program design and implementation at different junctures over the course of the pandemic. The first survey wave, conducted from August through October 2020, included more than sixty questions and was emailed to state, municipal, and nonprofit agencies captured in NLIHC's database of ERA program administrators (NLIHC 2022). It collected a total of 220 responses, though some (26 percent) were partial. The respondents represented a broad variety of jurisdictions (twenty-two statewide programs, forty-eight regional programs, eighty county-level programs, and seventy city-level programs) in forty states. The second wave, in April 2021, collected sixty-four responses from among the 140 programs that NLIHC determined to have launched or relaunched their programs to distribute ERA1 funds by that time for a response rate of 46 percent. A third wave, in July 2021, explored how well programs had been able to distribute these funds and collected 105 responses (representing 21 percent of programs known to exist at the time). The first wave of

programs reflects the greatest program variation; subsequent program iterations were more uniform as a result of the December statute and Treasury guidance. Nevertheless, the multiple waves elucidate programmatic change and illuminate how evolving legislative requirements affected program design. The survey waves do not track the same set of programs over time; only six individual programs are represented across all three survey waves. Eighteen jurisdictions surveyed in the first wave were resurveyed in the second (8 percent), and thirty-three programs surveyed in the second wave were resurveyed in the third (52 percent). Yet each survey captured a relatively large and representative cross section of ERA programs at the time.

A second dataset comes from surveys of tens of thousands of tenants who applied to emergency rental assistance programs administered by the City of Los Angeles, the County of Los Angeles, and the State of California. Two of the authors emailed survey links in January 2021 to a subset of tenants who had applied for rental assistance in the City and County of Los Angeles during the previous year and gathered 16,127 and 9,154 unique responses, respectively, response rates of approximately 46 percent and 22 percent. In the case of the California statewide program, a survey link was embedded directly into the online application and collected 16,154 valid responses between the program launch in March 2021 and June of that year, a response rate of approximately 27 percent. Thus, the Los Angeles survey responses pertain to first-wave ERA programs that used CARES Act funds, and California survey responses pertain to a second-wave program created to disburse Treasury ERA1 funds. All tenants who completed a survey were entered into lotteries for \$50 gift cards. The questions varied among the three surveys, some asking directly about barriers to applying for rental assistance and others about the respondent's housing situation, citizenship status, internet access, and tenant-landlord relations, all of which can shed light on the administrative burdens tenants bear. Table 1 lays out our various surveys and response rates.

An important limitation of the tenant survey data is that they include only responses from

tenants who filled out an ERA application and were able to complete an online survey. They do not take into account the many tenants who may have been eligible for assistance but were unaware that it existed, were unable to access the application, or did not have an email address or consistent access to internet. Thus the findings are biased toward those who could overcome several initial administrative hurdles. Rates of survey participation by race and ethnicity were, however, largely representative of the applicant pools. In California, for instance, Black and Hispanic applicants participated at rates of 17 percent and 40 percent, respectively, relative to their application rates of 16 percent and 37 percent.

Although the tenant survey responses are all from Los Angeles and California, findings are likely to be generalizable to other ERA sites. First, at the time of the surveys, the three ERA programs in question used online applications supplemented by call centers and community-based outreach. According to program surveys, hundreds of ERA programs nationwide had a similar administrative infrastructure in both 2020 and 2021: as of the fall of 2020, 92 percent of ERA programs had online portals, 48 percent allowed applications by hotline, and 77 percent conducted outreach by community-based organizations; by the summer of 2021, these figures had risen to 100 percent, 49 percent, and 89 percent, respectively. Second, because many of the eligibility criteria for ERA programs were determined at the federal level, applicants in California are likely to be similar to applicants elsewhere in that they are primarily very and extremely low-income, have experienced COVID-19-related hardship, and are at risk of housing instability and homelessness. Finally, identical or nearly identical survey questions that the authors have conducted with ERA applicants in Philadelphia in other work have yielded similar results; for example, lack of internet access and lack of awareness about the program hotline were the top challenges among both Philadelphia and California applicants during the application process.

Two of the authors also emailed a survey to landlords whose tenants had applied for ERA from the City of Los Angeles. This survey had a much smaller sample size than the tenant

Table 1. Survey Samples and Response Rates

Survey	Observations	Response Rate
National Program Surveys		
August–October 2021	220	50%
April 2021	64	46%
July 2021	105	21%
Tenant Surveys		
City of Los Angeles (January 2021)	16,127	46%
Los Angeles County (January 2021)	9,154	22%
State of California (March–June 2021)	16,154	27%
Landlord Survey		
City of Los Angeles (December 2020)	1,283	1%

Source: Authors' calculations.

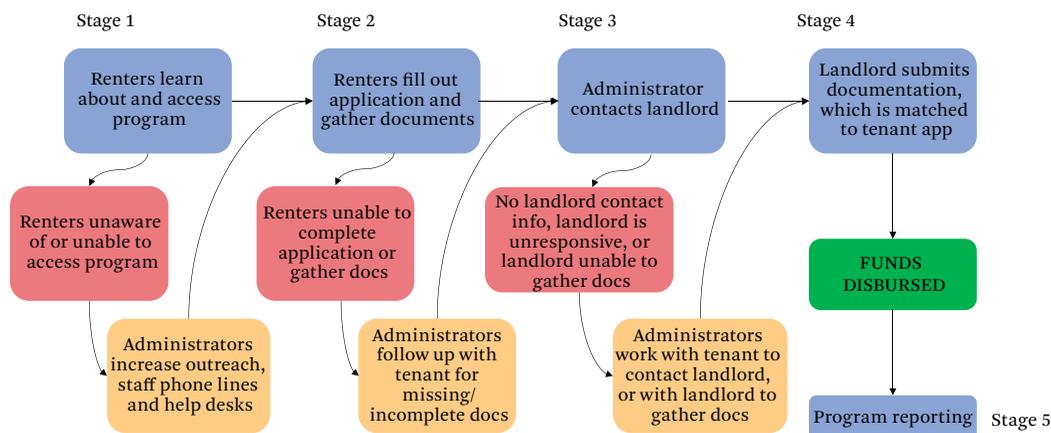
surveys, which is perhaps unsurprising, given that landlords had not initiated the application for assistance and therefore may have had less interest in the program and attempts to evaluate it, and that landlord contact information, which tenants provided, included many erroneous email addresses as well as corporate accounts which may not be regularly monitored, or are monitored by someone who may not have felt empowered to take the survey. The December 2020 survey of Los Angeles landlords received 1,283 responses. This represents a response rate of only about 1 percent of landlords whose tenants applied for assistance. It is also less clear how generalizable the results are, given that the federal statute imposed no ERA eligibility criteria on landlords. Nevertheless, the survey yielded novel information about landlords' perceptions about the local ERA program and, among those who chose to participate, their experience with the administrative process.

Finally, in August 2021, the authors conducted forty-five-minute Zoom interviews with the administrators of ERA programs serving the cities of Atlanta, Boston, Chicago, Los Angeles, Philadelphia, Portland, and San Antonio, and the states of California, Minnesota, and North Carolina. Unlike surveys, interviews could get at the question of why ERA programs were structured in certain ways, that is, the roots of burdensome requirements. The ten sites were selected to include a mix of state and local programs, which operate at different

scales and in different political contexts. Most of the programs were launched in the first year of the pandemic and thus have evolved in tandem with new funding sources and restrictions; the exception is California's statewide program, which did not launch until March 2021. The sample also includes some of the largest programs in the United States—the California ERA program, for instance, has been tasked with distributing more than \$2 billion in rental assistance—which have affected large numbers of tenants and landlords. Finally, the ten sites draw on the experiences of administrators from every part of the country. The interview protocol asked administrators their perceptions of the degree of administrative burden in their program and of the sources of that burden (for a copy of the interview protocol, see the appendix).

ADMINISTRATIVE BURDENS IN ERA PROGRAMS BURDENS

To understand the administrative burdens experienced by ERA applicants, it is useful to map the typical process for applying for emergency rental assistance. Figure 1 shows the four stages prior to disbursement of funds: renters learning about and accessing the application, renters submitting application and required documents, administrators contacting applicants' landlords, and landlords submitting documents. After these four stages are complete and funds have been disbursed, administrators are also responsible for a fifth stage—

Figure 1. Typical Process for Applying for Emergency Rental Assistance

Source: Authors' tabulation.

reporting—to ensure compliance with funding statutes. Additional steps are taken if submitted documentation is incomplete or an applicant's landlord is either unresponsive or unwilling to participate. This chart reflects the reality that ERA programs, especially in the first wave, required tenants to complete the initial application (97 percent of programs) but directed payment to landlords (91 percent), thus creating a dual take-up scenario.

In later iterations, ERA programs were more likely to have created platforms for both tenants and landlords to complete an initial application, 48 percent and 49 percent in waves 2 and 3, respectively. This did not eliminate the dual take-up challenge, however; the other party typically still needed to cooperate. The survey results are somewhat muddled because some administrators selected all three possible responses for questions about which party completes the application or receives payment. Nonetheless, it is striking that even in the third survey wave, 26 percent of programs continued to deny aid to tenants whose landlords did not agree to participate.

LEARNING COSTS

A key challenge for many programs was getting the word out about their ERA programs. These were either substantial expansions of small-scale existing programs (28 percent) or brand-new programs (72 percent) that were launched in a matter of months. Further, it was difficult

to get the word out about during lockdowns. Jung Hyun Choi, Laurie Goodman, and Daniel Pang (2021) find that in February 2021 just 30 percent of surveyed tenants living in buildings owned by small landlords were aware of their local emergency rental assistance program. Responding to an open-ended first-wave survey question—"Did the program receive as many tenant responses as anticipated?"—one-third (34 percent) answered in the negative. Some respondents noted "limited marketing/outreach," "confusion about eligibility and communication of the program," or "a lack of information/awareness," though others attributed the shortfall to renters taking advantage of extra unemployment benefits and other assistance.

Most programs combined a variety of outreach methods, including both traditional platforms such as newspaper and radio with more targeted outreach via community-based organizations and housing counselors (see table 2). It may have been particularly difficult to get the word out in the case of ERA because the programs were trying to reach renters who do not normally interact with the social service system. Many first-wave programs, 39 percent of survey respondents, in fact excluded renters who received other housing subsidies, and a few also reduced aid based on unemployment insurance and entitlements.

Interviews with program administrators also point to learning costs for renters. Some

Table 2. ERA Outreach Methods

	First Wave (Fall 2020)		Second Wave (Spring 2021)		Third Wave (Summer 2021)	
Outreach						
Social media	142	88%	49	94%	67	92%
Newspaper	97	60%	38	73%	50	68%
Radio	52	32%	38	73%	42	58%
Agency mailing list	73	45%	33	63%	44	60%
Advertisement by community-based organizations	125	77%	47	90%	65	89%
Advertisement by housing counselors	73	45%	35	67%	46	63%
Advertisement in housing court	44	27%	33	63%	34	47%
Other	56	35%	23	44%	20	27%
Total respondents	162		52		73	

Source: Authors' tabulation based on national surveys by Housing Initiative at Penn, NYU Furman Center, and National Low Income Housing Coalition (Aiken, Harner, et al. 2022).

interviewees praised their agency's outreach efforts: "from the beginning we've had outreach strategies for those who may not be comfortable working with government programs or [have] informal leases and rent arrangements." Others were less confident. One interviewee said that despite their agency's outreach efforts, "I do think awareness [of the program] is still really limited. . . . it's almost a pre-application barrier, from what we're hearing from advocates and . . . the geospatial patterns that we're seeing in terms of [where] our applications are coming from . . . I think we are still not fully reaching the most vulnerable folks . . . and I think some if it is just because folks haven't heard about it, or they don't think it's real, or there's skepticism." Another interviewee discussed how a significant lack of applications from immigrant communities in the first two iterations of their ERA program was now prompting the agency to ramp up outreach efforts, including multilingual advertisements on transit and billboards, public events, and partnering with immigrant-serving organizations to spread the word.

COMPLIANCE COSTS

Once renters learned about their local or state ERA program, they faced compliance costs associated with accessing and completing the application, which often involved submitting multiple pieces of documentation and identify-

ing and providing contact information for their landlord. Technological barriers proved significant for programs that relied heavily on online application platforms; the survey of renters who applied for rental assistance from California's statewide program in 2021 shows that issues with internet access was one of the greatest barriers to applying for assistance, second only to lack of awareness of a hotline that had been created to help applicants troubleshoot application issues (see table 3). The survey of households that applied for the County of Los Angeles' program in 2020 found that internet access had been the greatest barrier for applicants (affecting 20 percent of respondents), relative to awareness of the program hotline (13 percent), lacking proof of income loss (16 percent), or lacking income documentation (13 percent). This is perhaps unsurprising, given America's persistent digital divide between lower- and higher-income households (Vogels 2021). The survey of City of Los Angeles ERA applicants found that 14 percent had no internet access at home apart from cellular data.

The experience of these barriers varied by race and ethnicity (table 4). Hispanic applicants in California were significantly more likely than other applicants to identify at least one barrier to accessing the program. Difficulty documenting loss of income and tenancy were significantly more prevalent among Hispanic applicants. Issues with internet access, wide-

Table 3. Application Barriers in the California Statewide Program

	Respondents	Percent
Check all that apply.		
Not aware of the hotline	3,039	21
Could not reach the hotline	1,031	7
Issues with internet access	2,908	20
Not having proof of loss of income	2,383	16
Not having income documents	2,174	15
No proof of tenancy	1,030	7
Language barriers	716	5
Other	1,652	11
None of the above	6,296	43
Total respondents	14,590	100

Source: Authors' tabulation based on March–June 2021 Survey of California COVID-19 Rent Relief applicants by Housing Initiative at Penn (Reina and Goldstein 2021).

Table 4. Application Barriers in the California Statewide Program

	Non-Hispanic		Non-Hispanic	
	Black	Hispanic	Asian/Pacific Islander	Non-Hispanic White
Check all that apply.				
Was not aware of the hotline	21.0	19.8*	18.9	23.0*
Could not reach the hotline	6.3	7.2	7.6	7.4*
Issues with internet access	20.6	21.6*	17.4*	18.7*
Not having proof of loss of income	15.0	17.9*	14.7	16.2
Not having income documents	14.0	15.6	13.5	15.1
No proof of tenancy	5.6*	8.6*	6.7	6.3
Language barriers	0.5*	7.1*	10.9*	2.1*
Other	10.1*	10.6*	12.6	11.8
None of the above	47.1*	40.4*	42.4	45.1*
Total number of respondents	2,255	5,201	1,232	3,901

Source: March–June 2021 Survey of California COVID-19 Rent Relief applicants by Housing Initiative at Penn (Reina and Goldstein 2021).

Note: All numbers in percentages except the totals, which are numbers.

* $p < .05$ (significant difference relative to all other respondents)

spread across races and ethnicities, were also significantly more severe among Hispanic applicants. This resonates with Stephanie Pierce and Stephanie Moulton's (2023, this issue) findings that policies aiming to reduce compliance costs in the federal foreclosure prevention program, the Hardest Hit Fund, most benefited homeowners of color.

Program administrators did not always per-

ceive internet access to be a significant barrier. "Personally, I don't think it can be any easier," one interviewee said. "[Accessing the application] is not the hurdle. It's easy. . . . [Community organizations] can help persons who don't have—who are not computer savvy or don't have access to the internet, get to the program." National program surveys show that although most programs featured online appli-

Table 5. ERA Application Access

	First Wave (Fall 2020)		Second Wave (Spring 2021)		Third Wave (Summer 2021)	
How did/do tenants and landlords access the application? Select all that apply.						
Online	123	88%	52	98%	44	100%
Telephone hotline	64	60%	24	45%	23	52%
Paper (mail)	62	32%	19	36%	23	52%
Paper (drop off)	55	45%	20	38%	25	57%
In person	42	77%	21	40%	28	64%
Total respondents	134		53		44	
Is/was the application available in languages other than English?						
Yes	85	63%	46	87%	34	79%
No	49	37%	7	13%	9	21%
Total respondents	135		53		43	

Source: Authors' tabulation based on national surveys by Housing Initiative at Penn, NYU Furman Center, and National Low Income Housing Coalition (Aiken, Harner, et al. 2022).

cations (100 percent of the survey sample by the summer of 2021), a majority did also incorporate telephone and in-person options and some also offered a paper application option (see table 5). Yet the tenant survey results suggest that applicants were not always aware of these alternatives (one-fifth of applicants to California's program), or that they may have entailed additional challenges, such as a busy telephone queue.

A significant share of program applications were not available in languages other than English, as many as 37 percent among first-wave programs (see table 4), which may have imposed significant access barriers for renters with limited English-language proficiency. California's statewide ERA program did translate its online application into five languages and also partnered with local organizations that employ bilingual staff, yet 5 percent of the survey sample still cited language barriers as an impediment to applying.

Once applicants have accessed and understood the application, they face the compliance costs of tracking down and uploading the required documentation. Most programs, our surveys show, required renters to document their income (such as paystubs, bank statements, or tax returns), provide a current lease, and upload some form of identification. Early ERA programs also typically required tenants

to prove that they had lost income, accrued medical debt, or experienced some other form of financial hardship as a result of COVID-19; this requirement was relaxed over time as it became clear how difficult it was to document those hardships. Programs also varied in the stringency of identification requirements; some, by requiring Social Security numbers, excluded noncitizens.

The program administrators we interviewed attest that each documentation requirement has posed an important hurdle for applicants.

Anecdotally the biggest issues [for applicants] have been whenever they had to upload a document. . . . It introduced all sorts of [problems]. You know, say I have to upload a lease, well, I don't have a lease. A huge percentage of people [in our jurisdiction] have verbal or month-to-month leases. What do you want me to do? You know, we've been flexible to that to even, like, look, do you have receipts from paying rent? Just a screenshot, or something? . . . But some people pay in cash. And so that's been a challenge.

Similar issues arise for income verification, which is next to impossible for renters with cash earnings. Even identification could be a challenge: "Our case management staff reported a lot of people who had foreign IDs that

expired ten years ago, and initially, we were like, we're not going to take that, and we eventually realized they don't have anything else."

Treasury guidance has now given ERA programs explicit permission to address these issues by introducing self-attestation, whereby applicants can sign and date a statement of their income, financial hardship, tenancy, or identity (table 6). Between the spring and summer of 2021, of nineteen program administrators who responded to a question about programmatic change, all (100 percent) had introduced self-attestation of COVID-19 financial hardship, ten (53 percent) had introduced self-attestation of housing instability, and four (21 percent) allowed self-attestation of rental arrears. However, research shows that programs often offer opportunities to self-attest on a case-by-case basis, and thus an applicant may still bear the burden of a back-and-forth with program staff to be granted permission to self-attest (Reina, Aiken, Verbrugge, Harner, et al. 2021).

Another more recent strategy is to shift the

burden of documentation to the agency by relying on administrative data or proxies. One interviewee described efforts to collect income information directly from other offices within the jurisdiction, "so that we know who automatically income-qualifies based on people who are on Medicaid or SNAP . . . we just got that to work, last week, finally." Another said that if an applicant could not document their income but lived in a "proxy zip code" where the median renter household was income-qualified for the program, they would now accept the application. Still, program administrators continued to feel constrained in their ability to simplify the application for tenants. Language in funding statutes required them to ask for a current lease first and offer alternatives only if the tenant could not provide one, for example. "[If] we [had] the opportunity to ask them up front . . . we would have a much greater success rate of being able to review applications on the first try."

More than two-thirds (70 percent) of respondents cited "completeness of applications" as

Table 6. ERA Documentation Requirements

	First Wave (Fall 2020)		Second Wave (Spring 2021)		Third Wave (Summer 2021)	
What is/was asked in the application? Select all that apply.						
Documentation of income	107	83%	51	96%	70	95%
Current lease	106	82%	39	74%	48	65%
Proof of COVID-19 financial hardship	76	59%	40	75%	55	74%
Driver's license or state ID	75	58%	35	66%	37	50%
Social security number	52	40%	14	26%	19	26%
Birth certificate	27	21%	3	6%	5	7%
Documentation of housing instability	n/a	n/a	36	68%	46	62%
Total respondents	129		53		74	
May tenants self-certify or self-attest any of the following? Select all that apply.						
COVID-19 financial hardship	84	65%	51	100%	35	81%
Income	n/a	n/a	38	75%	30	75%
Tenancy (in the absence of a lease)	n/a	n/a	22	43%	13	30%
Rental arrears	n/a	n/a	13	25%	8	19%
Total respondents	129		51		43	

Source: Authors' tabulation based on national surveys by Housing Initiative at Penn, NYU Furman Center, and National Low Income Housing Coalition (Aiken, Harner, et al. 2022).

a program limitation in the first-wave survey. When applications are incomplete, program staff must reach back out to applicants for additional information. Yet “tenant responsiveness” is also a major limitation according to 56 percent of second-wave and 62 percent of third-wave program administrators surveyed. Most of the program administrators noted that follow-up with applicants about a particular document was an especially burdensome part of the process and hoped to avoid it:

The biggest burden [for us] is going back and forth with applicants whose applications need to be corrected in some way . . . and you know one of the things we are now emulating [from another ERA program] is, when they got all their applications, the first thing they did is they went through all of them, they identified which ones had some sort of issue the person needed to correct in terms of documentation and they basically put them on a pile and said we’re going to get to you later. And you know I think there’s a trade-off there because the people who have the less-than-perfect applications are probably disproportionately people who are more vulnerable.

The third stage of the typical ERA program involves contacting the applicants’ landlord to have them sign an agreement; upload further documentation, usually an Internal Revenue Service W-9 form, proof of ownership, and sometimes a tenant rent ledger; and provide the banking information needed to send rental assistance payments to the landlord. This introduces new compliance costs for tenants, many of whom do not know their landlord or how to reach them. The survey of tenants who applied for assistance in the City of Los Angeles found that about 30 percent had never interacted with their landlord or had done so but only online. In interviews, program administrators discussed the challenge of identifying and contacting landlords: “It’s proven to be a huge issue . . . we ask [tenants] to give us anything, you know, about your landlord, what do you know about them, their name, phone number. And that . . . creates administrative work on our side to then go track them down and actually

get them connected to the application so they know their tenant in the process.”

Further, a few Los Angeles tenant survey respondents reported altercations with their landlord related to nonpayment (9 percent), illegal rent increases (6 percent), illegal fines or fees for nonpayment (5 percent), or other harassment (27 percent). Such experiences can make tenants reluctant to contact their landlord to ask them to participate in a rental assistance program.

The challenges of this dual take-up model are apparent in program survey data. Nearly half (44 percent) of first-wave program administrators selected landlord cooperation as a program limitation. The two subsequent program surveys found landlord responsiveness to be a challenge 44 percent and 65 percent of the time, respectively. Interviews revealed that many program administrators tried to mediate the burden placed on tenants and landlords, such as by creating a landlord-facing portal that automatically matches landlords with their tenants. “One of the cool functionalities [of our system] is that landlords can go in and create an account for themselves and enter multiple bank accounts [and addresses], if they want to. And so . . . if a tenant then goes in and creates an application with that address, [it will] automatically get to the landlord. So that’s one tool that we put in place to try and easily link to landlords, because a lot of tenants don’t know who their landlords are.”

Twelve ERA programs surveyed in the fall of 2020 (9 percent of the survey sample) sent payments directly to qualifying tenants, effectively eliminating the dual take-up challenge. But Treasury guidance for the subsequent iteration of emergency rental assistance (ERA1) barred programs from making direct payments to tenants without first trying to engage landlords. One interviewee spoke to the effects of the policy change: “You know, I think we would have wanted to figure out some way to open the application to landlords anyway, but honestly, I think we all—I think we would have been interested in both tenant-only and landlord-only applications, which, interestingly, both of which were not really allowed.” Instead, tenants and landlords now had to work together, and programs needed to get information and consent

from both of them. This created problems, for example, when a landlord sought rental assistance, but their nonpaying tenant had already self-evicted and was no longer responsive. Now those landlords, many of whom are “owner occupant landlords in two-to-four-unit buildings [for whom] eight months without rent can be pretty devastating,” would be unable to access assistance.

Virtually every program administrator interviewed described programmatic changes designed to make it easier for tenants and landlords to apply for assistance. Many of these changes came in response to federal guidance. National program surveys show that as the Treasury released new ERA guidance over the course of the spring of 2021, about half of respondents revised their documentation requirements, usually requiring fewer total documents. Some (21 percent) also revamped their application process entirely. Some administrators reported that they had wanted to allow such flexibility from the start but had been frustrated by federal guidelines that they perceived as “compliance heavy.” Unfortunately, these initial restrictions became baked into the program infrastructure and were difficult to change:

I will say . . . from the start, we were so disappointed by the January guidance [from the Treasury Department] . . . and then we expected the February guidance to really relax to a much more simplified process, and I wouldn't say it did . . . [even] the March guidance maintained a pretty rigid structure. . . . The lack of ability to simplify got solidified [into] the infrastructure [of the program]. The ship doesn't turn that quickly. We've already taken applications in the old system and we've trained staff [to use it], we have two hundred processors who are looking at these applications.

PSYCHOLOGICAL COSTS

The stigma associated with ERA programs may have been less than in typical rental assistance programs because of the perception that people lost income due to the pandemic and through no fault of their own. Yet a recent randomized controlled trial found that sending

renters destigmatized information about an ERA program in Denver, Colorado, significantly increased take-up relative to those who received information about the program that was “clear and actionable” but did not address potential sources of stigma. Simply including phrases like “you're not alone and it's not your fault” and “we're here to help every eligible household get the assistance they deserve” on an informational postcard boosted participation over a noncommunication control by 89 percent, whereas excluding these phrases increased take-up by only 56 percent (Lasky-Fink and Linos 2022).

Renters and landlords also bear psychological costs that come from the hassles of applying, lengthy delays, and uncertainty about whether they would receive funds. Renters have recounted spending stressful hours filling out program applications as deadlines, such as expiration of their lease or lifting of federal eviction moratoria, rapidly approached (DeParle 2021; Zaveri 2021). Raker and Woods (2023, this issue) find the delay and denial of housing assistance in a disaster context to be associated with significant psychological distress. The reasons for these decisions were typically opaque; after repeatedly appealing delays or denials they did not understand, many applicants of assistance simply gave up. This process resulted in feelings of inferiority and despair.

Finally, psychological costs may also stem from negative perceptions of government. In an interview, one program administrator noted, “I think, in programs like this, it's so easy to forget the deep-seated mistrust and historical context that we're working in. There's just a lot of resistance and skepticism.” Having to rely for critical assistance on an entity one does not trust likely exacerbates stresses associated with the length and uncertainty of the application process.

LANDLORD ADMINISTRATIVE BURDEN

Landlords also experience administrative burden under the dual take-up model. Besides submitting documentation, they must understand and agree to any restrictions the program imposes. “For our program, we do have a funding acceptance letter that landlords have to sign . . . that, basically, states that they won't move for-

ward with eviction, for the period that our assistance covers and that they'll notify [a certain office] if there are any changes in tenancy. And kind of unpacking that letter for them is something that can take additional time."

The documentation requirements for landlords can be burdensome. The survey of Los Angeles landlords whose tenants had applied for ERA showed that most were able to complete the application for each tenant in less than thirty minutes (48 percent) or between thirty minutes and an hour (37 percent), but the remaining 15 percent spent upward of an hour per tenant. Only a third (34 percent) of landlords found the process somewhat or very easy, with the rest perceiving it to be neither difficult nor easy (34 percent), somewhat difficult (23 percent), or very difficult (8 percent). More than half of those surveyed (57 percent) found it somewhat unreasonable or unreasonable that the city required landlords to be up to date on their taxes in order to receive assistance. Some 38 percent deemed the requirement that landlords be licensed either somewhat unreasonable or unreasonable.

Both learning and compliance costs may have fallen especially heavily on mom-and-pop operations. As one program administrator noted, "I have a hunch that . . . larger landlords have the staff and resources to access or even initiate an application through our system . . . and then follow up with the required paperwork." The survey of landlords whose tenants applied to the Los Angeles ERA program found that large landlords, those with portfolios of thirty or more units, were about 90 percent more likely than small landlords, those with five or fewer, to be aware of the local eviction moratorium and 52 percent more likely to choose to participate in the ERA program. These results suggest the greater capacity of large landlords to monitor public policy and engage with public programs.

Finally, when landlords initiate the program application, they may face challenges engaging their tenants. "We are seeing a frustrated landlord contingency who wants to participate and is finding a resistant tenant, and the scale of our program makes it hard to provide, potentially, case management to that tenant. I think there's a lot of fear from that tenant that this is

coming through their landlord, and not understanding the dynamic," one program administrator said in an interview.

DOES GREATER ADMINISTRATIVE BURDEN REDUCE ACCESS?

Administrative burdens may have a wide range of negative impacts. They may undermine people's faith in the capacity of government, make programs less efficient and more costly, and contribute to social inequality by excluding people who have fewer resources or less capacity to overcome administrative hurdles (Herd and Moynihan 2018). It is beyond the scope of this article to determine the extent to which administrative burdens in ERA programs have contributed to these outcomes. Yet two subjective outcome measures built into the fall 2020 national program survey allow us to explore, on a basic level, whether certain program features were associated with increased or reduced access to aid.

The survey asked program administrators whether their program had experienced various limitations, including issues with application completeness. Analyzing whether certain program features were associated with higher or lower levels of application completion yields mixed results. We find that administrators were less likely to report incomplete applications as an issue when nonprofit organizations played a role in program implementation, though the difference was not significant. This suggests that when additional support was available to spread the word and help applicants navigate potentially burdensome application requirements, programs were more successful. We also find that administrators were slightly less likely to report incomplete applications as an issue when their program application was translated into multiple languages (again, the difference was not significant). Requiring tenants to provide proof of hardships related to COVID-19, provide a Social Security number, or not to have received other housing assistance significantly increased the likelihood of application completion challenges. Finally, a higher number of application requirements was weakly but positively correlated with application completion challenges ($\text{corr} = 0.11$).

These data offer some support for the con-

clusion that, by reducing administrative burdens, ERA programs can increase the number of eligible households served. The outcome measure is imperfect, however, because program administrators' perception of application completion as a limitation may have been endogenously linked with program design. That is, an administrator who had helped design and implement a more burdensome program might have been satisfied with a lower level of applicant follow-through. A more robust analysis would examine the relationship between program design and actual take-up in terms of the volume of tenant applications begun and completed.

THE ROOTS OF ADMINISTRATIVE BURDENS

A key question is why these administrative burdens exist and how they are justified. In our interviews with program administrators from ten ERA programs across the country, we asked about their perceptions of the roots of these burdens. Several administrators emphasized learning costs—highlighting the challenge of outreach: “The challenge is more so making sure people know about the program.” They emphasized the newness of these programs, the digital divide, as well as the fact that the pandemic closed off many of the normal channels of outreach, such as community meetings, door-knocking, and fliers at social service agencies and public institutions.

As for the roots of compliance costs, the explanation they raised most commonly was that requirements came directly from federal guidance. The program administrators asserted that their programs rarely required more documentation than what they believed the federal guidelines mandated or what was necessary to collect to comply with federal reporting requirements. Several interviewees specifically complained about the level of reporting that they were required to do. One program administrator said that the federal reporting requirements required them to “retool their data entry system” and that they drove most of their eight-page application.

The second most cited reason for documentation requirements also related to federal requirements: preparing for federal audits. In-

deed, many administrators seemed less concerned about fraud than about being punished if they failed to follow program rules. For example, one administrator described their program's documentation requirements as being about producing clear records to prepare for federal auditing. Another city brought in experts in federal compliance: “We had our own internal audit team come in and look at and review the files, they looked at the federal requirements and said, oh, this is what the federal team will look at when they come.” An interviewee from another jurisdiction noted that administrators were “leaning toward heavy documentation because of their concern about . . . audits.” They were less concerned about fraud than about the need to document everything to prepare for an audit, they explained: “I hear more conversations about audits than I do about fraud.” An administrator from another program stated they were wary about “what they might have to prove in an audit trail” and careful about “documenting their process for their audit trail.” Wary of audits, many administrators seemed to take a conservative approach, defaulting to viewing documents as required unless federal guidance expressly stated otherwise.

Shifting federal guidance added to administrators' woes. They complained that inconsistent and changing federal guidelines made program administration difficult, especially when staffing capacity was already an issue. Having to review and interpret new guidance, communicate changes, and retrain staff was challenging to program staff and also likely confusing to both tenants and landlords. All of this underscores the added administrative barriers that can come when multiple layers of government are involved in delivering a social program.

That said, the documentation requirements were not simply about following federal guidelines. Several program administrators noted the objective of minimizing fraud and ensuring that assistance went to the people who needed it. The interviews suggested that although real instances of fraud had arisen, they were rare: “We caught an instance recently where somebody applied for a property that we learned didn't actually exist anymore. It was demol-

ished. . . . People try to get very creative, as I call it. . . . But I mean, I have to say in the greater scheme of things, there has not been a huge amount of fraud allegations or suspicious situations. You know, I think there will always be someone [when] there is so much money on the table.”

Interviewees spoke frankly about trying to strike “an appropriate balance” between wanting to get funds out the door quickly while ensuring that dollars flowed to households in need. One administrator explained: “we have a real commitment to wanting to be responsible fiscal stewards or resources and really wanting to make sure that these resources are going to the households that they were intended to serve, but not making it an overly cumbersome process that actually has the adverse effect.” As another program administrator put it, “You don’t want the fear of fraud to make the program. . . . But, on the other hand, you don’t want to just open it up and give people money that, you know, could be used for someone who really did need help.”

In striking the right balance, many described conscious efforts to make rules simpler and more flexible, given the emergency nature of this program. For example, one program administrator said that they tried to prioritize simplicity from the start by allowing a variety of options for identification cards. An administrator from another city expressly distinguished their more flexible program from other social programs: “The status quo of many government assistance programs is falling farther away from accessibility.” Several program administrators indicated that their programs had loosened many administrative safeguards over time given that federal guidance expressly permitted self-attestation and more flexibility in the documentation programs could accept to demonstrate need. One promising approach was to implement internal processes that could reduce fraud without requiring additional documentation or effort from applicants, such as randomly auditing a small share of applications. The Ohio State Finance Agency also used this approach in administering mortgage foreclosure prevention (see Pierce and Moulton 2023, this issue). Another was using software that automatically validates email addresses,

phone numbers, and property occupancy as applicants fill out the application.

Many program administrators said that they quickly took advantage of federal guidelines that allowed them to lower barriers to applications, including allowing self-attestation. That said, adapting application processes to make them more user-friendly takes time and investment. One program administrator noted that as time went on capacity to incorporate a more strategic approach to making the application process easier for tenants decreased. A lack of staff capacity, cited as a challenge by 69 percent of first-wave survey respondents, could also prevent programs from building streamlined application platforms or offering case management services to assist individual households in completing their application.

The bureaucratic environment also played a role in shaping administrative burdens. One program administrator noted that their city leaders urged them to be more flexible given the urgency of the need, but others operated in more restrictive legal and political environments. Risk-averse programs did not take advantage of flexibility in funding statutes to implement burden-reducing mechanisms such as self-attestation, proxies, and direct-to-tenant payments until federal guidance granted them explicit permission to do so.

Finally, program administrators sometimes perceived their programs to be less burdensome than they were. For example, one administrator said in an interview that “where we sit now, we probably could be a pretty good model for other jurisdictions,” and felt that their program “had done a really good job being sensitive” to the challenges faced by tenants in completing the application—yet this program fell on the upper end of the spectrum with respect to number and stringency of tenant documentation requirements. Some discrepancies are also evident between what program administrators reported in terms of the availability of self-attestation and other burden-reducing features and what was observable based on program documentation (Reina, Aiken, Verbrugge, Harner, et al. 2021). Across ERA programs, interviews found a broad range of perceptions about what constitutes administrative burden and about what levels of burden are acceptable.

CONCLUSION

Despite the urgency of the need, administrative burdens in ERA programs have often been heavy. They have imposed significant learning, compliance, and psychological costs on the renters and landlords they are meant to serve. The burdens stemmed from the difficulty renters faced in learning about the ERA program (or the latest local iteration they were eligible for), technological barriers to accessing and completing an application, and documentation requirements. Over the course of the pandemic, some administrators made significant efforts to increase outreach, simplify program applications, and assist renters and landlords with the hurdles they encountered.

But perhaps the most fundamental barrier was that the vast majority of programs required both tenants and landlords to cooperate to receive assistance, creating the same dual take-up challenge that exists in many nonemergency rental housing assistance programs, including the housing choice voucher program. Some program administrators noted this and voiced a desire for a more radical revisioning of their rental assistance efforts. One described the benefits that could come from separating tenant and landlord assistance into two independent programs:

I think there are some basic challenges with the way that . . . the legislation has set up the [ERA] program . . . and I think this is one, that it requires coordination between landlords and tenants . . . you know, despite all the focus that Treasury has had on trying to reduce barriers to entry. So if, for example, this were just a guaranteed income program . . . you [wouldn't] have to prove that you rented an apartment, [that] you owed [rent] to the landlord, that would be a lower bar just based on program design. [And] if, for example, the landlord was applying for a tax refund that they were eligible for based on business losses in a given fiscal year, and the tenant didn't have to supply income information at all, that would be a lower bar as well.

Another interviewee suggested a universal basic income approach, saying, "I think there is

really something to be said for the sort of stimulus check model where it just shows up in your bank account. It's almost like you're automatically in unless you're not, as opposed to the other way around. . . . We also have to introduce different models of administering these programs and [reconsider] the assumptions we make about who needs help."

Going forward, the federal government might consider establishing standing emergency rental assistance accounts, which could help low-income renters manage idiosyncratic financial shocks, and could also be easily scaled up in times of broader need (Collinson et al. 2021). Such programs would be simple and automatic and would eliminate the need for double take-up on the part of both tenants and landlords. Such simplicity would come with trade-offs. Direct-to-tenant assistance would no longer be able to condition aid on landlord concessions, such as requirements to delay evictions and rent increases, and fewer documentation requirements would make targeting more difficult but could also invite more fraud. Especially in times of urgent need, however, policymakers should arguably view some level of fraud as acceptable if it means assisting a greater number of deserving applicants.

One potential silver lining to the delays in getting ERA funds out the door is the considerable media attention they attracted. Traditionally, administrative burdens associated with rental assistance have been largely invisible to the broader public despite their impact on low-income renters. Perhaps this experience will motivate that legislators and program administrators to assess and address burdens across housing assistance programs more generally. Although this article focuses on the administrative burdens that low-income tenants and their landlords face in emergency rental assistance programs, many of the challenges highlighted, especially related to the need for double take-up, are likely to hamper participation for housing choice vouchers as well. Evaluating and testing strategies to address burdens across all housing assistance programs is critical, especially as policymakers consider potential expansions.

APPENDIX: INTERVIEW PROTOCOL

We are doing research on the application process and documentation requirements in ERA (Emergency Rental Assistance) programs. We are trying to understand how administrators balanced the need to screen applicants and target eligible renters, while getting money out the door as quickly as possible.

Where do you think your program sits on the spectrum between administrative simplicity and accessibility on the one hand and other goals (e.g., fraud, waste and abuse)? Why is that the case? How do you strike the right balance?

Do you feel like you have the authority/ability to make the program work how you would have liked, why or why not? What would you change, if anything?

What have you heard have been the largest hurdles faced by tenants in completing applications? What about landlords? What about the agency?

I reviewed your application and documentation requirements, but can you confirm that both tenants and landlords can apply?

And it looks like you require: X, Y, Z documents? Is this correct? Is there anything else required from tenants? From landlords?

Do you allow for self-attestation in place of these documents? In which cases? How is the option to self-attest communicated to applicants?

To what extent were documentation requirements a function of state/federal statutory requirements?

Which documents were required by federal regulations?

What documents were required by state law?

For documents that weren't required by federal or state law, why do you think the program required this information? [Run through each requirement if there's time.]

[Listen for open-ended answer.

Follow up if needed:

Was the aim to reduce fraud?

Was it to ensure that only the truly needy apply for and receive funds (given limited dollars)?]

Have these requirements changed since the program started? If so, why?

Do you think those changes increased the volume of applications?

Do you think they shifted the composition of people applying?

Were there any unintended consequences?

How did you conduct outreach to ensure people could easily learn about the program?

Did you adopt any other strategies to make it easier for tenants or landlords to apply?

Were there unintended consequences?

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Disastrous Burdens: Hurricane Katrina, Federal Housing Assistance, and Well-Being



ETHAN J. RAKER AND TYLER WOODS

Few existing studies of federal disaster aid examine the logics that govern assistance access. Applying the lens of administrative burdens, we identify four onerous aspects of the Federal Emergency Management Agency's (FEMA) housing aid program—regulations regarding application unit, documentation, and damage sufficiency, and long processing times—that prompt assistance delay or denial for in-need households. Our empirical strategy pairs administrative records from FEMA on denied applications (N = 206,157) after Hurricanes Katrina and Rita with survey (N = 354) and in-depth interview data (N = 106) from a longitudinal study of low-income survivors of Katrina. Results show that applications from poor, communities of color were disproportionately denied or delayed due to burdensome program requirements and their implementation. Interviews and survey evidence elucidate the compliance costs and suggest a toll on post-disaster well-being.

Keywords: FEMA, natural disasters, disaster aid, mental well-being, administrative burdens

Climate change and population settlement patterns are rendering more people vulnerable to disaster exposure (IPCC 2014). Over the past half century in the United States, populations have grown in counties bordering the Gulf and Atlantic coasts (NOAA 2013), and tropical cy-

clones have strengthened and become slower moving (Sobel et al. 2016). The result of these dual patterns is a dramatic increase in the number of billion-dollar hurricanes that upend the lives of many people, including the most vulnerable (Smith 2020). As federal disaster aid

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becomes increasingly costly in this context, social scientists must conceptualize it as an essential part of the fragmented social safety net. Yet scholars have historically paid limited attention to government assistance from the Federal Emergency Management Agency (FEMA)—the agency tasked with administering most disaster aid—relative to other government programs.

A nascent but growing body of scholarship documents racial and socioeconomic disparities in federal dollars from disaster aid programs (Domingue and Emrich 2019; Kamel 2012; Kousky 2013; Muñoz and Tate 2016). Differences in disaster aid correlate with unequal population recovery at a community level and economic trajectories at an individual level (Howell and Elliott 2019; Raker 2020). Examining disaster assistance across affected places or people using dollar amounts allows scholars to quantify relative differences in FEMA assistance and the effects on recovery outcomes. Yet, by focusing on dollar amounts, we argue that existing studies fail to consider how inequalities may emerge in the process of accessing aid, leading some in-need people to receive delayed assistance or none at all. A handful of studies have shown how problems with contact information and insufficient damage are frequent reasons for application denials and needs for appeals (García 2021; Kousky 2013). Others have conceptualized long processing times in disaster rental assistance programs as a form of “temporal domination” (Reid 2013, 743). What remains largely unanswered is how people navigate the bureaucracy of federal aid in a period of acute need for housing, and what the scale and consequences of denial are for well-being in the recovery stage (Abramson et al. 2010).

In this article, we address this gap using mixed-methods data from two sources: administrative data from FEMA on applications for housing and property damage after Hurricanes Katrina and Rita in New Orleans; and survey and in-depth interview data from the Resilience in Survivors of Katrina (RISK) Project, a longitudinal study of low-income mothers who lived in New Orleans at the time of Katrina. Denials for government assistance are a strategic site to investigate the scale and consequence of

administrative burdens, but rarely do scholars have data to interrogate these processes. Drawing on Pamela Herd and Donald Moynihan’s (2018) framework, we examine denial disposition codes from administrative data to estimate the scale of burdens, and the survey and interview data from the RISK project to understand the experiences and effects of burdens on post-disaster well-being and recovery. Results from a tripartite analysis—a descriptive examination of administrative data, qualitative coding of in-depth interview data, and regression analyses on survey data—demonstrate three key findings.

First, regulations surrounding appropriate documentation; proof of homeownership, residency, and occupancy; and damage substantiation and sufficiency constituted a large share of denied applicants, contributing to an overall denial rate of 53 percent. Although we are unable to decipher true eligibility from the administrative data, both justified and unjustified denials contribute to burden, and the magnitude of denials suggests a level of burden whose costs borne by in-need people may be greater than the benefit of their function to prevent fraud. This trade-off imbalance is particularly striking given evidence of relatively little fraud in other disaster cases and the documented struggles of public officials to implement policies after Katrina given the unprecedented need for government assistance. Additionally, bivariate associations point to disproportionate denials due to documentation and duplicate applications in zip codes with higher poverty rates and more people of color, suggesting that these policies or their implementation may have exacerbated racial and socioeconomic inequalities. Second, qualitative data from the RISK project elucidate how in-need families experienced and navigated federal disaster assistance programs. In particular, the burdens of program compliance and the nature of interactions with FEMA bureaucrats were taxing on many of our respondents who had been denied assistance or experienced long waiting times for aid. Third, an analysis of survey data estimates the association between assistance denial and psychological distress. We find that being denied FEMA assistance, which interview data showed frequently oc-

curred alongside burdensome experiences with policies or their implementation, correlated with greater psychological distress compared to receiving assistance, net of housing damage and pre-disaster mental well-being.

BACKGROUND

Despite the common refrain that disasters level the playing field, the consequences of disasters are not distributed equally across groups (Tierney 2019). Instead, marginalized people, such as low-income and people of color, bear a disproportionate share of disaster exposure and negative consequences (Fothergill and Peek 2004; Tierney 2019). During Hurricane Katrina, flood damage was concentrated in predominately poor and Black communities with low-quality housing (Donner and Rodríguez 2008). Because low-income households are less likely to be able to prepare for disasters or have enough insurance to buffer their adverse effects (Fothergill and Peek 2004), government assistance may be a vital lifeline. FEMA's Individuals and Households Program (IHP), in particular, is an essential part of the post-disaster safety net for many marginalized people, and is often not their first encounter with government programs and bureaucracies.

ACCESS TO FEMA POST-DISASTER ASSISTANCE

To date, most research on FEMA and other post-disaster government assistance focuses on variation in aid amount (Grube, Fike, and Storr 2018; Muñoz and Tate 2016). Our understanding of the process of applying for and receiving federal disaster assistance, as well as the consequences of aid denial, is more limited. A small number of studies explore these topics, documenting how applying for post-disaster federal aid is often slow, difficult, and complicated (Kamel 2012; Reid 2013; Texas Advisory Committee to the U.S. Commission on Civil Rights 2021), with eligibility requirements that result in increased aid denial (García 2021). Megan Reid (2013), for example, examined Hurricane Katrina survivors' experiences with FEMA's rental assistance program, drawing on in-depth interviews and field observations with displaced Katrina survivors. She finds that FEMA policies and practices were ori-

ented toward a middle-class family structure and socioeconomic status, and that low-income people with complex family structures were forced to wait while the state investigated their applications, leading to negative psychological and material consequences.

More recently, scholars have examined the process of applying for FEMA aid after Hurricane Harvey in Texas and Hurricane Maria in Puerto Rico. In the case of the latter, approximately 60 percent of applications to FEMA's IHP were denied in Puerto Rico after the storm (NLIHC 2018), which Ivis García (2021) finds to be typically based on inadequate proof of home ownership, inability to make contact for inspections, or duplicate applications. His study was a descriptive qualitative one, with a small sample size. Chenyi Ma and Tony Smith (2020), however, provide quantitative evidence that most of the homes in Puerto Rico that were deemed "not economically feasible to repair" by FEMA belonged to low-income households, emphasizing how access to disaster assistance can exacerbate economic inequalities. A recent report by the Texas Advisory Committee to the U.S. Commission on Civil Rights (2021) describes how inconsistent eligibility criteria and complicated applications led to challenges for vulnerable populations applying for aid after Hurricane Harvey, ranging from requirements to produce extensive documentation to lack of language access for a diverse, multicultural population. More anecdotally, journalistic accounts of federal assistance after Harvey suggest that FEMA aid is often difficult to access and varies in its utility (Young 2017), given that many households were denied aid for some reason or another, such as a missed inspection. Although these studies offer insight into the experiences of disaster survivors applying for and being denied disaster assistance, missing from the extant literature is a unifying theoretical framework to understand these isolated denial experiences in a broader social and political context.

ADMINISTRATIVE BURDENS IN DISASTER AID

To fill this gap, we apply the concept of administrative burdens (Herd and Moynihan 2018) to the case of federal disaster assistance for hous-

ing and property damage. Herd and Moynihan define administrative burden as “an individual’s experience of a policy’s implementation as onerous” (22), identifying three distinct types of costs that individuals experience in citizen-state interactions: learning costs, compliance costs, and psychological costs. Learning costs include the time and effort individuals exert to learn about a given program and determine eligibility requirements; compliance costs include the information and documentation needed to establish eligibility and the financial costs of accessing services; and psychological costs include the stigma that can arise from participation in unpopular programs, or the stresses associated with application or participation. This framework centers individuals’ experiences of state actions, rather than the state actions themselves. In the introduction to this issue, Herd and her colleagues (2023) offer a clear summary of administrative burdens and how they often function as a mechanism to reproduce inequalities.

Administrative burdens tend to disproportionately affect marginalized individuals. Herd and Moynihan (2018) discuss how burdens are distributive and reinforce existing inequalities and power relationships. Policies for means-tested public assistance programs, which are primarily oriented toward poor and low-income individuals and families, are typically more burdensome than universal programs. For example, accessing Temporary Assistance for Needy Families is more difficult than Social Security or Medicare. Administrative burdens are often the product of political choices designed to protect political values, such as limiting “undeserving” applicants from accessing aid (Christensen et al. 2020), given that politicians are generally less willing to impose burdens on those seen as more deserving (Baekgaard, Moynihan, and Thomsen 2021). However, burdens can also arise with less explicit negative intent, such as in the implementation (rather than the design) of policies.

Empirical evidence is beginning to mount on how administrative burdens function in specific programs, including burdens in the Supplemental Nutrition Assistance Program (SNAP), the Earned Income Tax Credit, and Social Security (Herd and Moynihan 2018). We ex-

tend this literature by examining administrative burdens to FEMA assistance for housing and property damage, illuminating the compliance and psychological costs that in-need disaster survivors experience when seeking FEMA aid and the resulting consequences for well-being. Despite little scholarly application of the administrative burden framework to disaster aid, administrative processes in federal disaster assistance are beginning to receive U.S. policymaker attention. In a recent executive order, the Biden administration pointed specifically to the case of disaster victims waiting months for benefits as an example of a “time tax,” calling for FEMA to make accessing disaster assistance easier and less burdensome. A focus on long wait times for disaster assistance complements other scholarly work on time and waiting as a burdensome element of public policy. For example, Jennifer Bouek (2023, this issue) analyzes wait lists for subsidized childcare as a venue where burdens play out, identifying the stresses and uncertainty associated with such waiting. More generally, the experience of waiting represents what Stephanie Pierce and Stephanie Moulton (2023, this issue) classify as a passive compliance cost that imposes delays and uncertainty on clients, distinct from paperwork, documentation requirements, or other more active compliance costs. Using the case of FEMA disaster assistance, we show how such passive compliance costs, in turn, exert psychological costs.

OVERVIEW OF ADMINISTRATIVE BURDENS IN FEMA’S IHP

Established by the 1984 Robert T. Stafford Disaster Relief and Emergency Assistance Act, FEMA’s Individuals and Households Program is the key federal program that provides direct assistance to households following a disaster. A state governor requests a disaster declaration and, if granted, the federal government provides direct assistance for underinsured or uninsured damaged property (Reese 2018). Disaster victims apply for assistance with FEMA (whether by telephone, online, or in person), providing personal information such as social security number, current and pre-disaster addresses, telephone number, insurance information, household income, and a description of

losses (GAO 2006). After an initial assessment of eligibility, FEMA contacts victims to schedule an inspection, during which FEMA meets with victims in their homes to assess the damage, ownership, and occupancy. FEMA then approves or denies the application, within about ten days (FEMA 2005). If denied, applicants receive a letter detailing why they were denied and may appeal the decision within sixty days. Under IHP, at the time of Hurricane Katrina, the maximum aid per household was \$26,200. Although IHP also includes other forms of assistance, most FEMA IHP grants go toward the Housing Assistance Program (financial assistance for rental housing and home repair and replacement). In this study, we focus on the Housing Assistance Program.

Unlike other government programs that are means tested and for which eligibility is determined by a set threshold, FEMA determines eligibility after application and is based on the extent of property damage.¹ This shifts many learning costs—the search process of identifying programs, assessing eligibility and requirements—from an upfront barrier to program application to compliance burdens during and after application. One significant example is the mandate of one application per household, or the shared household rule, which prohibits multiple applications with the same residential address. This means that multigenerational families often struggle to access aid, disproportionately affecting low-income households with complex family structures (Reid 2013). It also ignores the realities of displacement during a major disaster such as Katrina, where many families provided the same contact information of a shelter (Young 2017), flagging applications as duplicates. However, documentation provided to applicants about IHP assistance does not explicitly state that only one application per household is allowed (FEMA 2005). Instead, survivors typically learned of this requirement after being sent a denial de-

termination letter, initiating a lengthy, and potentially frustrating, process of appeals.

Applicants also incur compliance costs when proving occupancy, ownership (for homeowners), and identity. Until recently, only certain forms of documentation were accepted for homeownership, which marginalized many low-income Black homeowners who pass down deeds intergenerationally (Dreier 2021). Additionally, when an inspector comes to a property to assess damage, they must determine that the damage crosses a particular threshold for the homeowner to be eligible for aid. However, the inspector must be able to access the property and the applicant must be present for the inspection, both of which were often impossible when homes were still underwater, and families were still displaced from New Orleans. Further, whether damage warrants aid is partly a subjective assessment of what makes a home “unsafe” or “uninhabitable.” Finally, in a moment of crisis when housing needs for poor families were extremely acute, the processing time for FEMA was often long, resulting in problems with contacting the applicants.

FEMA IHP seeks to both provide necessary assistance to households after a disaster and to prevent fraud or improper access to program assistance (GAO 2006). FEMA Deputy Associate Administrator Zimmerman, in her testimony to the Senate Homeland Security and Governmental Affairs Committee, noted that “FEMA must balance the requirement to quickly distribute funds to meet the needs of disaster survivors with its responsibility to be good stewards of taxpayer funds” (Zimmerman 2011). Despite reports of fraud during Hurricane Katrina (GAO 2006; Zimmerman 2011), evidence indicates that the prevalence of fraud has been relatively low after recent disasters. According to a GAO report after Superstorm Sandy, less than 3 percent of assistance was determined to be fraudulent (GAO 2014). In in-

1. Although eligibility for IHP was mostly determined when an individual applied, eligibility requirements were in place, including that the individual must have experienced losses in a federally declared disaster area; had uninsured or underinsured needs; been a citizen, noncitizen national, or qualified alien in the United States or have a qualifying individual who lived with the disaster victim; have been living at the home at the time of disaster; and be unable to live in or return to their home or have a home that requires repairs because of disaster damage (GAO 2006).

stances where the state attempts to manage competing values of program integrity and program access, administrative burdens often arise and do so amorphously alongside notions of deservingness. This is particularly true of federal disaster assistance after Hurricane Katrina, where many survivors were both “deserving” because of their status as disaster victims and “undeserving” because of the association between accessing public assistance and their various identities, like race and gender (Reid 2013).

OVERVIEW OF THE CASE: HURRICANE KATRINA

Hurricane Katrina struck the Gulf Coast of the United States in August 2005 as a category 5 hurricane, wreaking havoc on an entire region, causing prolonged displacement, and resulting in billions of dollars in damage. The storm and its aftermath killed nearly two thousand people and displaced countless more (Picou and Marshall 2007); New Orleans was particularly hard hit. The most disastrous effects came not from wind damage or heavy rains, but instead from catastrophic flooding that resulted from the breach of several levees in New Orleans, compounded by gross government mismanagement (Brinkley 2006). Poor, people of color were especially vulnerable to Katrina, bearing a disproportionate brunt of the losses (Elliott and Pais 2006). Hurricane Katrina was an extraordinary disaster event that surpassed the conditions for which many FEMA policies were designed. The policies and practices of FEMA IHP were meant to respond to a typical disaster, but Hurricane Katrina was in no way typical, given the scale and extent of damage and displacement and its overwhelming concentration in vulnerable neighborhoods. As we show in this article, FEMA policies were unprepared for to meet the needs of survivors following such an extraordinary event. Indeed, Hurricane Katrina famously exposed the shortcomings of federal disaster assistance programs.

DATA AND METHODS

Our empirical analysis marshals three forms of data from two sources, all focused on survivors of Hurricane Katrina (or Rita) from the same forty-seven zip codes in the New Orleans area.

ADMINISTRATIVE FEMA DATA

First, we use administrative data from FEMA for the final dispositions of all federal disaster aid applications filed after Hurricanes Katrina and Rita. We acquired the data via a Freedom of Information Act request in 2018 (FOIA 2019-FEFO-00891). To assess the frequency of denials presumed to generate burdens, we conduct a descriptive analysis of the denial categorical outcomes. We use three pieces of information from each household-level application: the type of damage for assistance, denial disposition code, and zip code of residence. We restrict our descriptive analysis to the 438,365 applications that FEMA considered for either home repair or personal property replacement from forty-seven zip codes in New Orleans. Of those, 5.73 percent were appeals from first-round decisions and 5.92 percent were withdrawn by the applicant, resulting in 387,298 first-round nonwithdrawn applications (206,157 denied). To the forty-seven zip codes, we link data using the corresponding ZCTAs from the 2000 Census on two demographic measures: the proportion of adults (ages eighteen to sixty-five) living below the poverty line, and the proportion of the population that are people of color (except non-Hispanic White).

RESILIENCE IN SURVIVORS OF KATRINA PROJECT

The second data source is the Resilience in Survivors of Katrina Project, a mixed-methods, fifteen-year longitudinal study of Hurricane Katrina survivors from 2003 to 2018 (Waters 2016). Participants were enrolled in two community colleges in New Orleans before the disaster, and as a study requirement, were parenting a child younger than eighteen years old and living below 200 percent of the federal poverty line. Participants were primarily Black and single mothers. For this article, we rely on in-depth interview data from 2006 to 2010, and survey data from a pre-disaster baseline in 2003 and a one-year follow-up in 2006–2007.

The in-depth interview sample includes 106 participants who completed a post-disaster interview between 2006 and 2010, selected for variation in their post-disaster mental health and residential location. We employed a flexible, iterative coding process (Deterding and

Waters 2021). First, we applied a series of index codes that captured any experiences respondents had with FEMA or other government assistance. Next, we developed and applied analytic codes to the portions of the transcripts included in the FEMA index codes. These codes correspond with the administrative burdens and associated consequences we identified a priori (learning and compliance costs associated with documentation, sufficiency, application unit, and processing time). We also included an Other code, which we applied to experiences that did not fit neatly into one of the established buckets. Next, we read through the output of the Other code and developed new, emergent codes, which we then applied in another reread of this output.

The survey data come from an analytic sample of $N = 354$ respondents with complete data on all variables. We measured psychological distress one year before and one year after the disaster using the Kessler-6 (K-6) scale (Prochaska et al. 2012). The K-6 score is a construct of nonspecific psychological well-being and is estimated by a series of six questions to respondents whether they have had feelings of helplessness, hopelessness, restlessness, effort, sadness, and worthlessness in the last month. Response options are (0) none, a little, some, most, and (4) all of the time. For the main independent variable, we constructed a mutually exclusive categorical variable corresponding to the status of respondents' FEMA housing aid at the time of the post-disaster survey, using several questions about application, inspections, and approval. We categorize respondents' status with federal disaster aid as (1) no request (no application), (2) denied (applied and received denial), (3) pending (applied and awaiting either decision or for home appraisal), and (4) approved (applied and received aid).

To isolate the association between disaster aid status and psychological distress, we include several key variables. Each respondent was asked their level of housing damage on a 5-part scale from none to enormous. Time since the disaster is the number of days since Hurricane Katrina, given that the survey interview date is correlated with the probability of receiving a final determination on an aid ap-

plication. We also include a parsimonious set of sociodemographic control variables measured one year before the disaster. Age is a continuous variable. A dummy variable differentiates Black respondents from non-Black respondents. A dummy variable indicating single and not cohabitating is used for marital status. Self-rated health is a variable ranging from one to five, corresponding with excellent to poor health. A dummy variable differentiates socioeconomic status indicating those who received no public benefits relative to those who received at least one, such as SNAP, Section 8 housing, or disability. We measure social support using the Social Provisions Scale (Cutrona and Russell 1987), which ranges from one to four.

Equation (1) shows the fullest model specification, regressing psychological distress (Y) at the post-disaster survey wave (t) as a function of (F), the status of respondents' FEMA housing aid application:

$$Y_t = \beta_0 + \beta_1 F_t + \beta_2 Y_{t-1} + \beta_3 H_t + \beta_4 X_{t-1} + \varepsilon \quad (1)$$

β_1 is the main coefficient of interest in our analysis. It is estimated conditional on a lagged measure of distress before the disaster ($t-1$), a variable capturing the level of housing damage (H) post-disaster, and the previously mentioned sociodemographic controls assessed before the disaster in vector X . We first assess a baseline model that excludes vector X . In text, we use the summary K-6 score (ranging from 0 to 24). In supplemental analyses, we estimate equivalent models on each of the six items, and we also examine dummy variables indicative of moderate mental distress (MMD)—K-6 score greater than 7, and serious mental illness (SMI)—K-6 score equal to or greater than 13. These regression models are intended to provide descriptive evidence of associations and are therefore not interpreted as causal estimates.

RESULTS

Our results section proceeds in three parts, relying on each source of data to uncover (1) the frequency and distribution of denials per FEMA administrative data; (2) the experiences of compliance and psychological costs from the RISK study interview data; and (3) the relationship

between aid denial and well-being from the RISK study survey data.

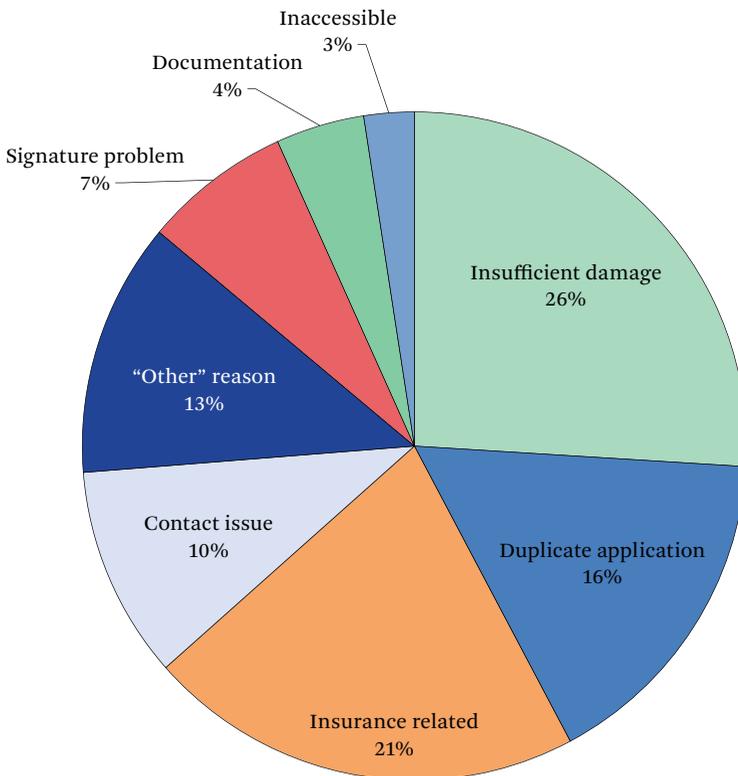
FREQUENCY AND DISTRIBUTION OF DENIALS, FEMA DATA

Of the 387,298 first-round nonwithdrawn applications for home repair and personal property replacement, FEMA approved 46.77 percent of applications for aid and denied 53.23 percent (206,157). Figure 1 shows the distribution of denial categories. What were the policy logics associated with assistance denial in hard-hit areas of New Orleans following Hurricane Katrina? The modal reason for denial was insufficient damage, which constituted just over a quarter of denied applications (26 percent). Reasons related to insurance coverage (insurance over the maximum payout) were also common (21 percent). Another 16 percent of applications were denied due to duplication from another applicant, and 10 percent to the inability

of FEMA to contact the applicant. Problems with signatures (7 percent), documentation (4 percent), and inaccessibility (3 percent) constituted about 14 percent of denied applications together, corresponding to around twenty-eight thousand applications denied aid.

Figure 2 maps the spatial distribution across the forty-seven (and adjacent) zip codes in New Orleans of disaster assistance applications (panel A), overall rates of denial (panel B), and rates of denial for three specific categories discussed in previous research to be particularly consequential compliance regulations in vulnerable populations (panels C through E). The total number of applications ranged from 357 applications in 70343 to 35,964 in 70117 (Bywater and Lower 9th Ward). Despite an overall individual-level denial rate of 53 percent, the community-level denial rates ranged from 35 percent in 70049 to 70 percent in 70047—two zip codes on opposite banks of the Mississippi

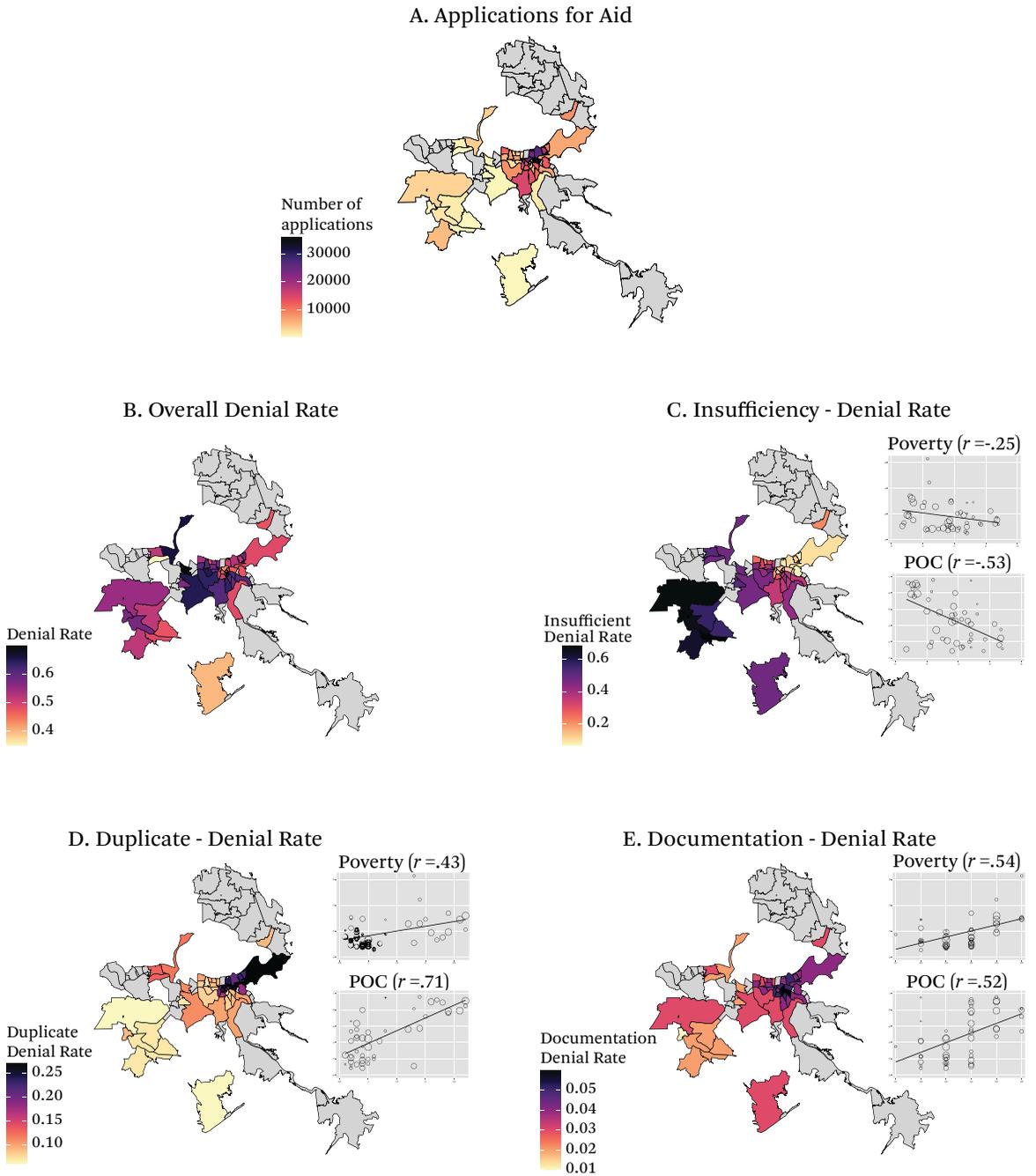
Figure 1. Distribution of Denial Categories for Ineligible Applications



Source: Authors' calculations based on FEMA FOIA data (FEMA 2019).

Note: $N = 206,157$.

Figure 2. Zip Code Distribution of Applications and Denial Rates After Hurricanes Katrina and Rita in New Orleans



Source: Authors' calculations based on FEMA FOIA data (FEMA 2019).

Note: Poverty = the proportion of adults (ages eighteen to sixty-five) living below the poverty line.

POC = proportion of the population who are people of color (all except non-Hispanic White). We refer readers of the print edition of this article to <https://www.rsfjournal.org/content/9/5/122> to view the color version.

River. Panels C through E show stark divergent spatial patterns of denials due to insufficient damage, duplicate applications, and documentation across zip codes. The majority Black zip code 70129 in New Orleans East had the highest rate of denials due to duplicate applications at 27 percent.

Administrative data from FEMA did not include information about applicants. To understand if denial rates map onto local demographics, panels C through E provide two bivariate correlations between the denial rate (Y axis) and, first, the proportion of adults in poverty and, second, proportion of the population who are people of color. The local denial rate for insufficient damage was negatively associated with local poverty and racial composition. This makes sense as greater damage occurred in low-income, minority communities. In panels D and E, we find strong, positive relationships between both community-level poverty and racial composition, and the local concentration of denials for duplicate applications and documentation. The correlation between documentation denial rate and poverty and concentration of people of color was 0.53 and 0.54, respectively. The correlation between the local denial rate for duplicate applications and concentration of people of color was 0.71 and 0.42 for the poverty rate.

EXPERIENCES OF COMPLIANCE AND PSYCHOLOGICAL COSTS, THE RISK STUDY

The denial reasons documented in FEMA data were commonly experienced by RISK participants as burdensome, either as a function of policy design or the failure to implement them in the overwhelming disaster circumstance. We use in-depth interview data from RISK, in combination with documentation and reports on FEMA IHP policies during Katrina, to detail the compliance and psychological costs participants incurred when applying for disaster aid.

Application Unit

Many respondents experienced difficulties applying for and receiving FEMA assistance be-

cause of the prohibition against duplicate applications, which permits only one application per household. This shared household policy intended to prevent providing duplicate benefits. The program expects that everyone in a household will coordinate and submit one application. However, the documentation that FEMA provided potential IHP applicants (FEMA 2005) makes no mention of this restriction against multiple applications from a single address, which was ultimately confusing and frustrating for individuals who were denied under this rule.

For example, Victoria was a twenty-two-year-old Black woman with a young son at the time of Katrina.² She had been living in her own apartment in New Orleans, but after her landlord raised the rent, she and her son moved in with her parents the month before Katrina. She lost everything when her parents' home was flooded in the storm. She applied for FEMA assistance to replace her personal belongings, including her clothing, furniture, and car, but was denied when her mother claimed her as a resident on a different application. Despite being told by FEMA to appeal her case, she continued to be denied and ultimately gave up: "[FEMA] said I wasn't eligible and that I was on my mom's application and that made me ineligible. . . . They said that we should appeal it. So, we did that, and they still said I was ineligible, so I just left it alone."

Victoria was unaware that the policy prohibited multiple applications from the same household when she applied for assistance. This lack of transparency from FEMA resulted in a frustrating interaction between Victoria and FEMA that could have been avoided by clearer delineations of eligibility requirements. Furthermore, Victoria's family situation—a multigenerational household of adult children with families living with their parents—was not uncommon, but even though she likely maintained personal property and managed household finances separately from her parents, she did not receive assistance.

Other respondents were similarly denied assistance because they cohabitated with others,

2. All demographic information refers to respondent characteristics at the time of interview. Pseudonyms are used throughout.

often parents. Samantha was twenty years old, had one child, and lived at home in New Orleans with her mother. Like Victoria, she noted that her mother received help from FEMA, but she did not: "My mother got help from FEMA. I didn't get any assistance from FEMA because they were saying it was a duplicate [application], because they said I lived in the same household." Despite living at the same residential address, many of these families functioned independently, with adult children paying rent (often informally) to parents. Families living together may have had their own personal property, but FEMA policy does not recognize the potential division of assets within a household. By immediately denying any application from an address used on an existing application, the implementation of the policy led to a difficult appeals process and often no assistance for in-need families.

Additionally, the realities of post-disaster displacement made the enforcement of the shared household rule difficult. Most of our sample was forced to evacuate New Orleans and many lived in community shelters across the Gulf Coast region. This meant that many survivors shared a telephone line for the shelter and listed the shelter as their contact information on their FEMA application, to ensure that they would be reachable (given that this was before cell phones were commonly used, especially among low-income people). As a result, some of these applicants were also flagged as submitting a duplicate application and denied. Nicole, who was twenty-six years old at the time of Katrina and had one child, told her experience: "[FEMA] was telling me that I have a duplicate application. . . . This happened to a lot of people—if you used the same telephone number as somebody else, that's going to show that you have a duplicate application. . . . People in the Astrodome had duplicate applications because they used the same phone number."

In addition, when families were displaced from New Orleans for an extended period, family members often separated. One component of IHP assistance for housing damage is rental assistance, but the restriction against duplicate applications precludes these separated family members from separately accessing rental assistance. According to the GAO (2006, 24),

FEMA recognized this issue and adjusted the policy after the fact: "FEMA created new IHP procedures to allow multiple household members separated by the disaster to receive rental assistance. As a result of Hurricanes Katrina and Rita, thousands of families evacuated to locations across the country and in some circumstances required families to temporarily separate. As a result, providing assistance to multiple household members was warranted."

Our respondents were instead consistently denied when more than one household member applied. Note that in some cases, this policy did capture fraud as intended, but the original denial of the recipient led to burdensome and stressful processes of appeals. For example, Cynthia, a twenty-year-old mother, related that a relative in Florida claimed FEMA benefits using her address, and that she was denied assistance as a result: "[FEMA] didn't give me anything because my uncle tried to claim our house. . . . They told us we couldn't get it. . . . He tried to get FEMA [aid] for our house, and he was in Florida somewhere." This story highlights the trade-offs in policy design and implementation between program integrity and access. The adjudication process between duplicate applications may lessen burden if the implementation of the shared household rule did not simply deny the additional application from a given address, as was the case with Cynthia, and set off a lengthy appeals process. Instead, it could be the role of FEMA to use administrative records to ensure that the rightful applicant is not mistakenly denied.

In sum, the restriction against duplicate applications that produced burdens for our respondents had three primary issues. First, the restriction itself was poorly communicated to applicants. Our respondents were unaware that they were prohibited from applying if they lived with their parents, and thus were confused when they were denied for this reason. The documentation that FEMA provided applicants in August 2005, titled "Help After a Disaster" (FEMA 2005), makes no mention of the requirement that only the head of household applies. This often resulted in unnecessary and burdensome interactions between applicants and bureaucrats. Second, the policy itself does not account for the complicated family situations of

many low-income families, such as multigenerational households. Third, FEMA's method for adjudicating between multiple applications by immediately denying second applications with a phone number or address, often leads in-need people to a lengthy appeals process.

INSUFFICIENT DAMAGE AND THE FEMA INSPECTION

Applicants must also meet a threshold of damage sufficiency when FEMA inspects the damage to their property. Following Hurricane Katrina, however, large swaths of New Orleans remained inaccessible for weeks or months. When FEMA inspectors were unable to access these homes, survivors' applications were sometimes denied on grounds of insufficient damage. Rebecca, a twenty-nine-year-old Black mother of five, experienced this: "[FEMA] said that I didn't have sufficient damage. But the same report that said I didn't have sufficient damage said that the inspector couldn't even get to my apartment because it was still underwater. Well, if you couldn't get there and it was underwater . . . how could you say I had nonsufficient damages?"

This respondent then appealed the decision, after which FEMA noted that they would have to wait several weeks until the water receded. This experience sheds light on the burdens that applicants endured to meet a threshold of damage sufficiency during an inspection as set out by FEMA. The requirement for an inspector to assess property damage and for the applicant to be present for their inspection fails to consider the reality that many applicants are displaced and may not be able to return to their homes.

Although her property was accessible, Madison, a twenty-nine-year-old mother of one, was denied because she was displaced in Georgia. She said that an inspector attempted to schedule an inspection, but despite Madison's being out-of-state and providing alternate contact information for a designated representative, the inspector never called: "The person who called me that was supposed to meet with you, I told him I was in Georgia. And he said, well I have to get somebody to come to verify that I came. The numbers that I gave her, she never called. . . . That house was not livable." As a re-

sult, Madison was denied FEMA assistance. She made clear that the process of scheduling and communicating with the inspector was also burdensome in addition to her being displaced and unable to be present. FEMA likewise attempted to accommodate applicants in these types of situations (GAO 2006). For example, FEMA said that for applicants in areas that were inaccessible due to high flood waters, it used "remote sensing" (satellite technology) to assess damage and allowed applicants to designate a third-party representative to be present for inspections (GAO 2006). Again, however, our respondents were often still denied, suggesting potentially uneven implementation of these accommodations or a struggle on the part of implementation given the overwhelming need.

In some instances, respondents also reported unfair or mistaken characterizations by FEMA inspectors regarding the damage to their homes. For example, Julia explained that the inspector assigned to her case incorrectly determined the damage to her home: "I lived in a duplex and my house was downstairs and somebody lived up over me. But because the way the house looked, [the FEMA inspector] thought I had an upstairs and downstairs. She was like, 'oh, you didn't have any damage.' And I fought tooth and nail, wrote back and forth, nothing."

This represents a common trend: FEMA made an assessment considered incorrect by the respondent; the denied respondent attempted to appeal the decision; but the lengthy appeal and bureaucratic process led to people giving up and aid never materializing. In the face of unprecedented disaster, FEMA found itself overwhelmed by the sheer volume of affected individuals. FEMA inspectors are mostly a contract workforce, and in the case of Katrina were mobilized on short notice, cutting corners on typical training procedures for new inspectors (GAO 2006). Our respondents often bore the consequences of these policy and implementation issues, as seen in struggles with FEMA inspections.

DOCUMENTATION

To receive FEMA assistance, applicants must provide documentation that establishes home ownership, occupancy, and identity. However,

given the rushed and chaotic conditions under which most families evacuated during Hurricane Katrina, it was common for people to not have any of this documentation with them while displaced. Many families assumed that they would be returning to New Orleans within a couple of days and left important documents at home. When it came time to apply for FEMA aid, those without proper documentation often ran into difficulties. Kristen was such a twenty-five-year-old mother of two. She noted that assistance was delayed because of issues she ran into trying to provide adequate documentation: “[FEMA] put us through so much to get [assistance]. Like we didn’t have any documents to send them showing them that we were affected by it. I had my ID because I had my purse. But most of the stuff I didn’t have.”

Like Kristen, Catherine was also initially denied on grounds of inadequate documentation. She was living in a house with her mother and her two children but had used a post office box address because of issues with postal delivery to her address. Despite providing a lease showing that she was her mother’s tenant, Catherine was denied assistance. Eventually, she appealed the decision, and her mother went to a recovery center in Houston to sign a letter attesting that this was all true, after which FEMA provided aid. However, these documentation requirements resulted in significant delays in receiving assistance as well as stress on Catherine and her family to appeal the decision and receive the aid for which they were eligible. This exemplifies how the burden of proof falls on individuals rather than the state, at a time when those individuals are in acute need for housing and stability.

Rebecca ran into similar problems with documentation while trying to secure assistance, but, unlike the previous two respondents, these problems prevented her from ever receiving assistance. Many of her important documents were in her parked cars, which were lost during Katrina. After months of fighting for assistance, she eventually gave up: “They [FEMA] kept saying one thing after another. They didn’t have the paperwork on my car. And I said, well, I have to get it. But everything was in the car. . . . When we came back, it was gone. Both our vehicles. . . . They were gone. So, it took us a while

to get certain documents. But we fought with them up until maybe the end of 2006, beginning of 2007, when I just said, you know what, forget it.”

PROCESSING TIME

The extended processing time between applying for assistance and receiving that assistance from FEMA was often very long and thus costly for survivors. Indeed, both Angela and Lindsey explained that they waited between four and eight months for assistance, meaning that they were left without aid during the crucial weeks and months following the disaster. For example, Lindsey noted that “before I got my apartment, I think it was like about four months . . . and then it was maybe eight months before I got any actual financial reimbursement for personal property.” Angela applied for FEMA assistance at the beginning of September 2005 right after the storm hit but did not receive any aid until February 2006. For Cynthia, the wait was enough to give up: “And when I called FEMA to ask why they weren’t they helping, they told me they wrote out a check, but ‘we don’t know who to send it to.’ I’m like, I sent you everything. I sent you my new statement. I sent you my housing plan. I sent you where I work and everything and they were like, ‘oh well we’re still reviewing it.’ I’m like you know what? You can take this shit and stuff it.”

In addition to delays in receiving assistance, Cynthia received confusing and sometimes contradictory information when asking FEMA for updates on her application, suggesting that processes in place were overwhelmed by the magnitude of need after the disaster.

Kristen similarly pointed out that the reasons for delay were typically opaque. Recall that Kristen experienced difficulties providing adequate documentation to FEMA. She said it was almost impossible to know exactly why her assistance was delayed: “Because when you would talk to FEMA, you would get five to six different answers from people. So, you really don’t know what the reason for the hold up. Because they’ll tell you so many different things. You’ll call five times a day. They’ll give you five different stories.”

Investigations by the GAO provide support for our respondents’ experiences of long pro-

cessing times. Despite explicitly providing estimates of ten days from application to inspection and ten days from inspection to decision (FEMA 2005), processing times were often two to five times longer (GAO 2006). This entailed significant costs for our respondents.

INTEGRITY, ACCESS, AND DESERVINGNESS IN DISASTER ASSISTANCE

A common theme across many of these individual experiences is that myriad FEMA policies made accessing disaster assistance onerous, lengthy, or even impossible for in-need families. As discussed, public assistance programs balance program integrity and program access (for a robust discussion of value trade-offs and error in administrative burdens research, see Bouek 2023, this issue). Our qualitative data suggest that the delay and denial that resulted was burdensome and stressful.

Consider the respondents, such as Victoria and Samantha, who were denied FEMA assistance because of the duplicate application rule. Both were denied because they were claimed as dependents on their parents' applications, despite being adults with families of their own. These denials represent the policy working as intended, but at issue was that the policy itself failed to recognize the complex family structures and living arrangements of many poor families, suggesting an issue in policy design. In contrast, other respondents were denied assistance because of issues with providing supporting documentation, such as Kristen and Rebecca, or because they were unable to meet the inspector, such as Madison, suggesting issues with implementation. One interpretation of the practices to prevent fraud or the duplication of benefits, mainly by shifting the burden of proof onto the individual, is that FEMA sets out disaster aid deservingness to those who were not displaced for extended periods, who did not lose their documents and paperwork, and who have the ability to meet with a FEMA inspector whenever necessary.

CONSEQUENCES OF DELAY AND DENIAL

The delays and denials associated with these policies are not innocuous. For a low-income, marginalized population recovering from a nat-

ural disaster, being denied FEMA assistance for all the reasons outlined has negative consequences for mental well-being. Within the administrative burden framework, being denied is a clear psychological cost of the burdens associated with navigating FEMA programs. Indeed, many of our respondents reported experiencing acute distress because of the difficulties they encountered applying. For example, Kelly was a twenty-nine-year-old mother of two who is unemployed and relying on her husband's income to make ends meet. She said waiting for FEMA and ultimately being denied multiple times was difficult for her family: "The hardest thing is not receiving any [assistance]. . . . That's the hardest thing because like I said, the little money that my husband is earning, we're putting dime by dime to fixing our home for us. So, the hardest thing is not receiving any help. When you are applying for it [FEMA aid], you get turned down."

For many, the link between experiences of financial hardships resulting from disaster-related expenses and psychological well-being was tight. For those who lost everything after Hurricane Katrina, many shared their experiences of psychological distress. Rebecca, whose story we told earlier, is one example: "I was really out of money. I was fighting with FEMA. . . . I was trying to get what I thought I should have gotten, and everybody just kept turning me down. And I would have to go through all this paperwork, and I'm like, I don't want to have to ask anybody to help me, because everybody's going through it. And I was wondering how we were going to survive, how we were going to pay these bills, and I just didn't see a way out."

Rebecca's difficult experience applying for FEMA aid led her to feel like she was "having a breakdown." Rather than being a vital safety net in a moment of acute crisis, the burdens associated with FEMA assistance led to further distress. Rebecca pointed out that, in addition to the time and effort she put into accessing assistance (such as standing in lines), she also felt the weight of psychological costs by having to ask for help. For some of our respondents, applying for FEMA assistance was associated with stigma because they were judged and made to feel inferior for seeking aid. For exam-

ple, Erica, twenty-eight years old, described both the hassle and how she felt inferior: “I just didn’t feel like going through the hassle of standing in the lines, waiting on the phones and, you know. . . . I was like, you know what? I’m just sick of this. I’m tired of feeling like I’m begging people for something or, you know, like they call us so-called refugees. . . . That was just disgusting and aggravating. It was like, uh-uh, I’m not doing this.”

Being called a refugee, cast as an outsider jumping through hoops to access basic government assistance, and feeling inferior for seeking out assistance took its toll on Erica and many others.

DISASTER AID DENIAL AND WELL-BEING: SURVEY EVIDENCE FROM RISK

RISK respondents’ narratives clarify and underscore the costs incurred in accessing disaster assistance, which required difficult compliance processes, stringent requirements, and taxing procedures. Each denial generated some form of burden, stemming from factors that admin-

istrative data suggested were not unique to the RISK survey sample but generally experienced by applicants from low-income, communities of color. Qualitative data also suggested a link between denials or delay and well-being. We now turn to assess this association using survey data.

Table 1 provides the descriptive statistics of the RISK survey sample. The sample mean K-6 score increased from 5.59 to 6.81 from before to after Hurricane Katrina. The prevalence of moderate mental distress increased from 22.60 percent to 38.42 percent.

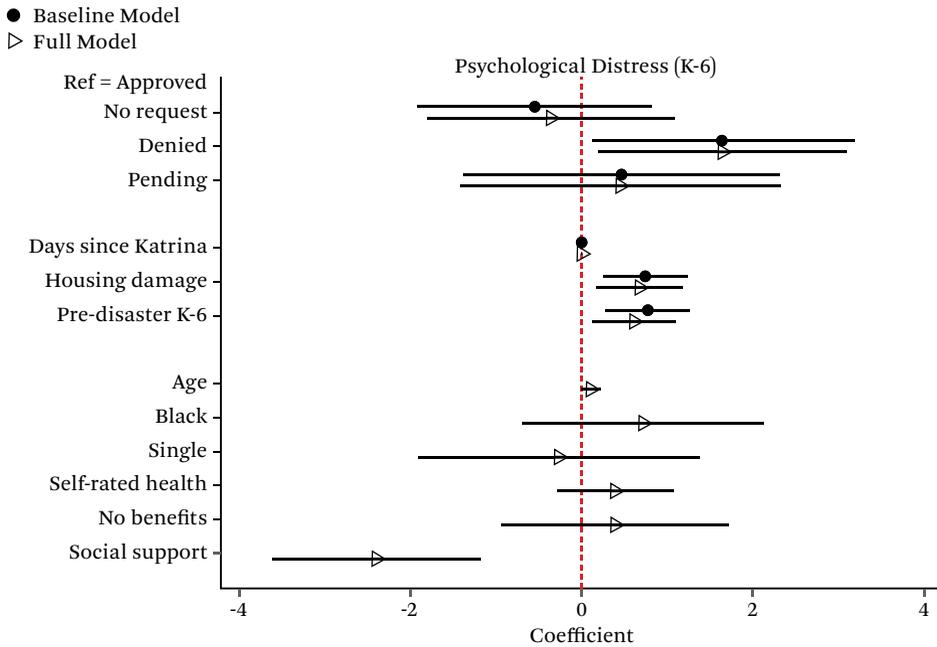
Figure 3 presents results from two nested multivariable OLS models regressing post-disaster K-6 on FEMA aid application status (for tabular presentation, see table A.1). Survey participants who were denied FEMA aid scored significantly higher on the K-6 scale of psychological distress relative to those approved for aid ($\beta = 1.637, p < .05$), controlling for level of damage and pre-disaster psychological distress. The effect was not attenuated by the inclusion of additional controls for sociodemographic in-

Table 1. Descriptive Statistics of Survey Sample, Percentages, and Mean (SD)

Pre-disaster K-6 distress score	5.59 (4.10)	[0, 24]
Post-disaster K-6 distress score	6.81 (5.23)	[0, 24]
Pre-disaster SMI	6.78%	
Post-disaster SMI	14.12%	
Pre-disaster MMD	22.60%	
Post-disaster MMD	38.42%	
FEMA aid status		
No application	9.04%	
Denied	23.20%	
Pending	9.04%	
Approved	58.80%	
Days since Hurricane Katrina	357 (74)	[256, 560]
Housing damage level	2.93 (1.15)	[0, 4]
Age	25.55 (4.47)	[18, 34]
Black	81.4%	
Single, not cohabitating	87.8%	
Self-rated health	1.97 (0.88)	[1, 4]
No public benefits	26.8%	
Social support	3.21 (0.47)	[1.63, 4]
<i>N</i>		354

Source: Authors’ calculations based on the Resilience in Survivors of Katrina Project (Waters 2016).

Note: Data from the Resilience in Survivors of Katrina Project. SMI = serious mental illness; MMD = moderate mental distress.

Figure 3. OLS Models Regressing Post-Disaster Mental Well-Being on FEMA Aid Application Status

Source: Authors' calculations based on Resilience in Survivors of Katrina Project (Waters 2016).

Note: $N = 354$. Point estimates and 95 percent confidence intervals displayed. Models use robust standard errors.

dicators in model 2. We find no statistically significant difference in psychological distress between those with pending applications and those who had already been approved for aid. Among the controls, social support correlated with lower levels of distress, protecting against mental health adversity ($p < .001$). As expected, those with greater housing damage also experienced significantly greater psychological distress after the storm, net of other factors.

Holding all other variables at their means, the full model predicts that respondents who were denied aid had a K-6 score of 8.86, above the threshold used clinically to indicate moderate mental illness. Those who did not apply for aid had a predicted K-6 score of 6.06, whereas those who were approved had a predicted score of 6.42. Respondents with pending applications scored 6.87. In figure A.1, equivalent models to those presented in figure 3 but regressed on the individual K-6 measures demonstrate that aid denial was particularly consequential for three subquestions: experiences of restlessness, sadness, and effortfulness. We show that aid de-

nia] was significantly associated with a greater likelihood of experiencing serious mental illness, relative to no mental illness, indicated by a K-6 score of above 13. It did not significantly distinguish the likelihood of moderate mental distress, relative to no distress; however, the coefficient is in the expected direction (see figure A.2).

DISCUSSION

This article contributes to a growing body of scholarship documenting the contours and consequences of administrative burdens in public policy. Using data obtained from FEMA through a FOIA request, we first offer descriptive evidence that denials of FEMA assistance that generate burden are common and more likely to occur in disaster-affected areas with higher proportions of poor residents and people of color. Second, drawing on in-depth interview data with low-income mothers, we document how marginalized survivors experienced compliance and psychological costs associated with applying for FEMA aid, particularly stem-

ming from duplicate applications, damage insufficiency, and failed documentation. Our respondents described the slow, complicated, frustrating process of applying for aid only to be denied or to have their assistance delayed in times of hardship. Survivors explained that these denials took a toll on their mental well-being. Survey evidence paints a similar picture. Our quantitative data suggest that aid denial was associated with greater psychological distress relative to those who were approved aid. The burdens our respondents encountered resulted from issues with design and with implementation, or in some combination. Our data cannot clarify the precise origin of these burdens. We focus instead on their scale and their impact.

Applying the lens of administrative burdens and examining their consequences highlights how federal disaster aid programs can exacerbate inequality for poor and minority residents in disaster-prone areas and reinforce existing power structures. Wealthier households are less likely to experience major damage from disasters because they live in less disaster-prone areas and may also have the resources to navigate and manage complex aid programs (Fothergill and Peek 2004). Conversely, poorer households are more likely to live in disaster-prone areas and may need government assistance, such as FEMA, to buffer the negative socioeconomic impacts of disasters. We have documented how the compliance and psychological costs associated with FEMA's IHP further disadvantage the poorest and minority households and inhibit their long-term recovery. Our findings suggest that residents of areas with greater proportions of poor and minority households are more likely to be denied aid because of duplicate applications and lack of documentation—burdens that may be alleviated by smart policymaking that shifts them to the federal government.

These distributive consequences can also point to notions of deservingness. On the one hand, making post-disaster assistance easier to access might mean that more people receive aid who otherwise would have been deemed ineligible, leading more individuals to receive aid who otherwise are seen by the state as undeserving (for example, those who miss inspec-

tions, those who do not have enough damage). On the other hand, prioritizing program integrity leads some individuals who are eligible to experience burdens, which arise from policies that limit access and ensure integrity (such as documentation requirements). Our analysis illuminates the burdens resulting from these policies or their implementation that disproportionately affect marginalized households after a disaster, and to point toward how integrity, access, and deservingness are state logics that combine in ways that may contribute to inequality.

Although the eligibility and compliance requirements may appear neutral at face value, their impacts are not. Our qualitative evidence suggests that families ran into issues proving sufficient damage, and the aggregated analysis of administrative data that denials due to insufficiency were less common in areas with higher poverty and more people of color. These bivariate relationships, however, do not control for damage severity, given the disasters' greater impacts in marginalized neighborhoods in New Orleans (Donner and Rodríguez 2008). Thus the aggregated nature of this evidence may further mask underlying mechanisms, and future research should model relationships between burdens and outcomes conditioning on key individual-level attributes like more objective severity.

In terms of mental health and well-being, our finding that aid denial is associated with psychological distress highlights the need to consider government policies—and more suggestively, administrative burdens—as social determinants of health. We were unable to differentiate the cause of denials in the survey data, but our qualitative data suggest that many denials and their associated policy processes were burdensome for respondents. The qualitative data also support our interpretation of the direction of the association given that we did not find evidence that mental health problems led to greater difficulty with program navigation.

CONCLUSION

Reduced or delayed access to FEMA IHP assistance after disasters gave rise to significant administrative burdens, with negative consequences for disaster survivors. A recent

summary of study evidence concludes that one key stage of promoting post-disaster health equity is that “social services should integrate and strive to reduce the administrative burden on survivors” (Raker et al. 2020, 2128). Identifying how to reduce burdens for citizens or shift them to the state is critical. This could be achieved several ways in FEMA’s IHP. First, FEMA should craft the IHP program to be more generous for disaster survivors. Since Hurricane Katrina, the program has not become more generous: \$26,200 in August 2005 has the same buying power as \$36,900 in October 2021 (\$1,000 less than the October 2021 maximum grant). FEMA could integrate community-level social vulnerability indices in the calculation of awarded grants and relax the concern that some households may receive “too much” aid.

Second, FEMA should reconsider the trade-off of reducing fraud and promoting access. By focusing almost exclusively on reducing fraud and abuse of the program, at the expense of access for in-need survivors, the structure of disaster aid in its current configuration comes with costly trade-offs. Instead, increasing access through virtual assessments and wider documentation standards could help FEMA officials struggling to implement appropriate procedures. The Florida Automated Community Connection to Economic Self-Sufficiency (ACCESS), the state’s service delivery model for its public assistance programs, offers an innovative approach (Heflin, London, and Mueser

2013). Rather than filling out paper applications and visiting a state office for an interview, individuals apply for benefits via ACCESS, an internet-based system that determines eligibility simultaneously for multiple programs and does not require documentation to verify most expenses and assets. FEMA could look to ACCESS as an example of a service delivery model that prioritizes access in managing the application process, determining eligibility, and delivering benefits.

Beyond these potential changes in the near term, we believe now is the time to seriously reconsider the structure of disaster aid in the United States. Climate science suggests that even with large investments in greenhouse gas reduction, trends in disaster severity will continue. Creating a universal disaster assistance program is worthy of consideration. Some scholars argue for a universal, parametric-based flood insurance program (Sengupta and Kousky 2020), which would eliminate many administrative burdens. There would be no need to prove eligibility, schedule an inspection, or track down and submit required paperwork. Another site of potential overhaul would be the structural integration of FEMA processes with existing government structures, such as the Internal Revenue Service on property taxes, to reduce applicants’ need to prove their eligibility. If guided by scholarly evidence, decision-makers can reduce or shift administrative burdens to promote equity and recovery in the face of disaster.

Table A.1. Tabular Form of Figure 3, OLS Models Predicting Post-Disaster Well-Being

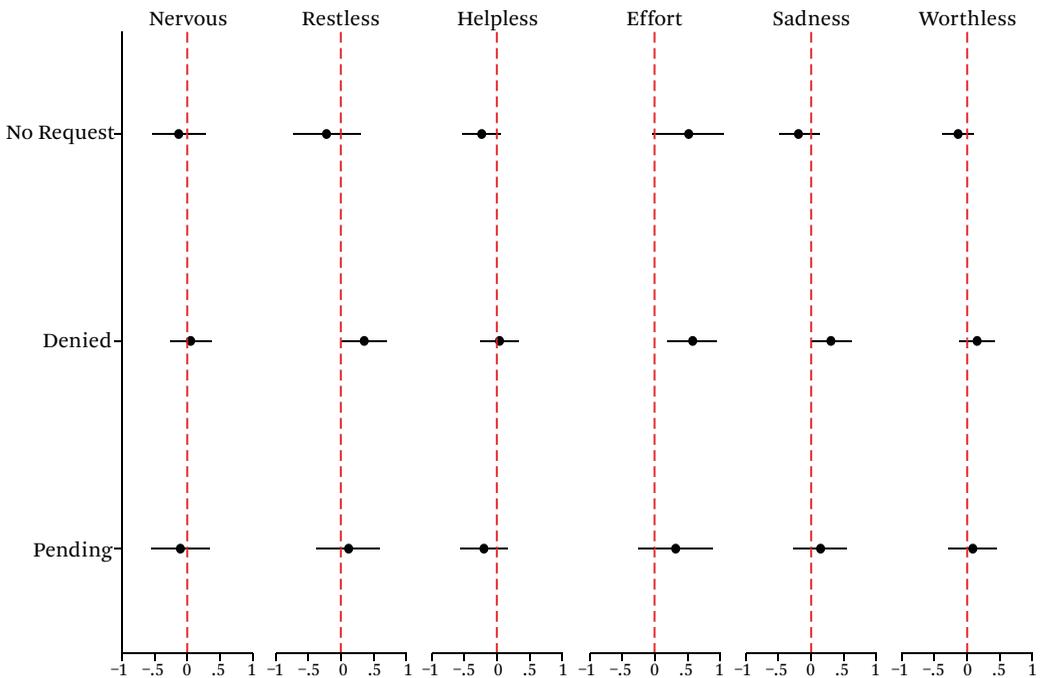
	K-6 Psychological Distress			
	Model 1		Model 2	
	coef.	SE	coef.	SE
Aid (ref=approved)				
No application	-0.547	0.695	-0.358	0.736
Denied	1.637*	0.766	1.646*	0.737
Pending	0.466	0.940	0.453	0.952
Days since Katrina	0.000	0.004	-0.000	0.003
Housing damage	0.743**	0.252	0.677**	0.258
Pre-disaster K-6	0.774**	0.249	0.613*	0.248
Age			0.106	0.059
Black			0.720	0.717
Single			-0.266	0.835
Self-rated health			0.390	0.345
No benefits			0.393	0.686
Social support			-2.395***	0.619
R ²	0.078		0.141	

Source: Authors' calculations based on Resilience in Survivors of Katrina Project (Waters 2016).

Note: N = 354.

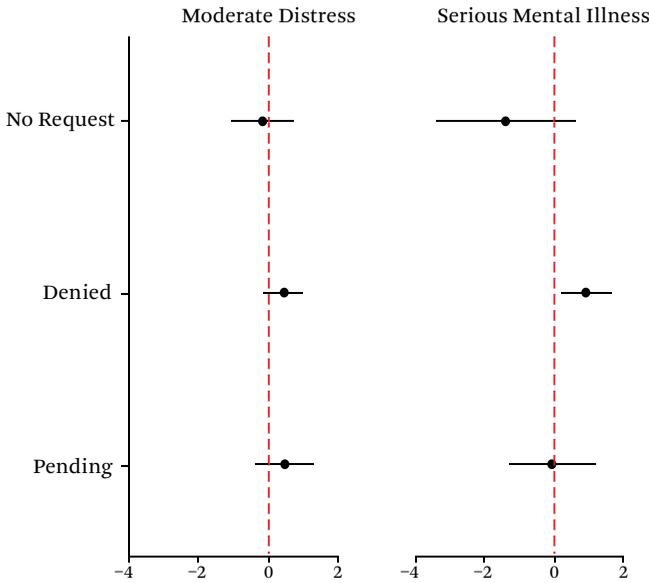
*p < .05; **p < .01; ***p < .001

Figure A.1. FEMA Aid and Individual Measures in K-6 Scale



Source: Authors' tabulation based on the Resilience in Survivors of Katrina Project (Waters 2016).

Note: Results from fully adjusted models that control for all variables in model 2. Reference group is Approval.

Figure A.2. Two Models Predicting Post-Disaster Mental Distress and Mental Illness

Source: Authors' tabulation based on Resilience in Survivors of Katrina Project (Waters 2016).

Note: Results from fully adjusted models that control for all variables in model 2.

Reference group is Approval.

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PART VI

Housing Supports

The Effects of Administrative Burden on Program Equity and Performance: Evidence from a Natural Experiment in a Foreclosure Prevention Program



STEPHANIE CASEY PIERCE^{ORCID} AND STEPHANIE MOULTON^{ORCID}

In this article, we examine the effects of reforms to reduce administrative burden in a foreclosure prevention program by streamlining the application process and reducing applicant wait times. We find that the reforms are associated with a significant 23 percent increase in the rate of benefit receipt and a 7.5 percent decrease in the foreclosure rate. These effects are even larger for applicants with more difficult-to-document hardship situations. However, we also find evidence of congestion, where the elimination of documentation requirements increased processing times for applicants, undoing some of the positive benefits. These findings suggest that shifting the documentation burden to the state without sufficiently expanding state capacity may substitute one form of administrative burden for another.

Keywords: administrative burden, foreclosure, unemployment, take-up

The administrative burden of proving eligibility for government programs is shown to undermine program equity and effectiveness (Christensen et al. 2020; Heinrich 2018, 2016). Means-tested programs are often associated with compliance burdens, such as significant paperwork and documentation requirements to confirm that would-be recipients meet program eligibility requirements (Moynihan, Herd, and Ribgy 2016). The Hardest Hit Fund

(HHF) is a multistate foreclosure prevention initiative launched in 2010 that provided mortgage assistance to homeowners with financial hardships. The means-tested program has been criticized for its onerous documentation requirements and long application processing times (Special Inspector General 2018). In this article, we examine the effects of reforms to reduce administrative burden in Ohio's HHF program.

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In an effort to get assistance more quickly to homeowners in need, the Ohio HHF program enacted reforms to, first, streamline the application process—including temporarily eliminating a requirement that applicants submit documentation to prove a financial hardship, and, second, improve internal processes for reviewing and approving applications, thereby reducing congestion and lengthy applicant wait times. Both types of reforms affect the compliance costs of application—but in theoretically distinct ways. Building from the literature on human capital and individual agency in the experience of burdens (Christensen et al. 2020; Peeters and Campos 2021; Masood and Azfar Nisar 2021), we define two sources of compliance costs, active and passive. Active compliance costs are incurred when the individual applicant is responsible for taking the next action, such as filling out paperwork or submitting documentation. Passive compliance costs are incurred when the applicant must wait for the organization to take the next action, such as processing or approving the application. Most application processes impose both active and passive compliance costs on individuals, but in varying degrees.

The distinction between active and passive compliance costs adds nuance to the notion of shifting burdens between the individual and the state. Limited organizational capacity and bureaucratic processes can lead to congestion and lengthy delays for applicants—as was the case in the HHF program studied here. In fact, congestion is common in emergency assistance programs that are ramped up quickly in response to a crisis, such as in the Emergency Rental Assistance program launched in the wake of the COVID pandemic (Aiken, Ellen, and Reina 2023, this issue). Thus, even if the intention is to get benefits out quickly to as many people as possible, congestion may unintentionally create burdens for applicants, negatively affecting those who may be most in need but are unable to persist through a lengthy process. This reinforces the need to think holistically about the regime of burdens experienced by individuals rather than narrowly focusing on a single burden (Herd et al. 2013; Moynihan, Gerzina, and Herd 2022; Rauscher and Burns 2023). State actions or in-

actions to alleviate one source of burden may unintentionally exacerbate other sources of burdens. Thus, shifting burdens from the individual to the state without adequate attention to state capacity may simply substitute active compliance costs, such as arduous application processes, for passive compliance costs, such as long wait times.

For this study, we leverage rich administrative data on 68,460 households that began the application process to Ohio's HHF program between September 2011 and the end of 2014, of which 17,564 ultimately received assistance. We refer to the rate of transition from beginning the application to ultimate receipt of benefits as the program *pull-through* rate. Active and passive compliance costs are typically incurred after deciding to apply to a program and affect who persists through the process. Our data provide a unique lens on this stage of the process. The administrative data include detailed information on applicant characteristics, including race, income, and source of hardship, as well as information about whether an applicant eventually received assistance. We link these data to individual-level data on wage earnings, unemployment claims, and loan outcomes from 2009 to 2016.

Using these data, we estimate interrupted time-series analysis (ITSA) and linear probability models (LPM) to identify the association between the introduction—and subsequent removal—of reforms intended to reduce compliance costs on applicant processing times, pull-through rates, and subsequent program outcomes—regardless of whether applicants experienced foreclosure within three years of applying for assistance. The ITSA model allows us to examine changes in outcomes immediately after the introduction of the policies by aggregating individual data to the month level and identifying an interruption or discontinuity in the expected time trend. However, the ITSA model does not control for individual characteristics that may also vary with the introduction of the policy, which is a strength of the LPM. Comparing outcomes across the two specifications increases confidence in our results.

Our ITSA results indicate that administrative reforms enacted to reduce active and pas-

sive compliance costs were associated with an increased HHF pull-through rate of 4.1 percentage points—a 22.7 percent increase over the previous pull-through rate. These changes were also associated with a reduced three-year foreclosure rate of 1.6 percentage points, or 7.5 percent among all individuals who started the HHF application process, regardless of whether they ultimately received assistance. In our LPM specification, the reforms are associated with a 2.8 percentage point (19 percent) reduction in the probability of foreclosure. This is a substantive reduction in foreclosure: a prior study found that the receipt of HHF assistance was associated with a 40 percent reduction in the probability of mortgage default and foreclosure (Moulton et al. 2022). Reduced administrative burdens thus increased the probability that individual who started the application and who may have otherwise experienced foreclosure ultimately received HHF assistance, thereby reducing the probability of foreclosure for the entire applicant pool.

However, we also find evidence that some of the reduction in active compliance costs—the elimination of required documentation—was associated with increased passive compliance costs as measured by increased application processing times. Our ITSA model results show that application processing time increased by twenty-seven days (14 percent) after the initial policy changes, the increase being driven by the time it took the state agency to process the application after the participant submitted the application (passive compliance costs). When the documentation requirement was reinstated, we observe a significant reduction in processing times, a further increase in applicant pull-through rates, and a further decrease in foreclosure. Taken together, these findings suggest that shifting the documentation burden to the state without sufficiently expanding state capacity may simply substitute one form of administrative burden (active compliance costs) for another (passive compliance costs)—both of which have detrimental effects on applicants.

Our data allow us to observe differences in responsiveness to application compliance costs based on the complexity of an applicant's situation (Herd and Moynihan 2018). In Ohio's

HHF program, the documentation process was easiest for applicants who were receiving unemployment benefits. Other hardships, such as loss of income associated with a medical hardship, divorce, or death of a spouse were more difficult to document. In our preferred specification, we find no significant association between reduced compliance costs and the pull-through rate for homeowners with easy-to-document unemployment claims, whereas the pull-through rate for homeowners without unemployment claims increased by more than 56 percent. Similarly, we find an 11.3 percent decrease in the foreclosure rate for homeowners without unemployment benefits, but no significant difference in foreclosure rates for homeowners with unemployment benefits.

We also examine heterogeneity in outcomes for groups that we expect to be more or less likely to be affected by administrative burden. Studies find that administrative burden disproportionately affects disadvantaged groups (Christensen et al. 2020; Herd and Moynihan 2018; Jilke, Van Dooren, and Rys 2018; Nisar 2018). We find that reduced compliance costs are associated with a higher probability of women receiving assistance, an association largely driven by women without unemployment benefits. Further, demographic differences in the composition of homeowners without unemployment benefits versus those with unemployment benefits are important. Homeowners without unemployment benefits were more likely to be Black, more likely to be female, and more likely to be older. Thus, the administrative reforms were associated with improved program equity for these disadvantaged groups.

This article makes several unique contributions to the literature. First, we define and test two theoretically distinct sources of compliance costs—one that requires the applicant to take action (active compliance costs), and another that requires the applicant to wait on the state to take action (passive compliance costs). This distinction extends an understanding of how differences in human capital and behavioral factors may interact with different forms of burden to exacerbate inequities in the distribution of benefits (Christensen et al. 2020; Linos and Riesch 2020; Masood and Azfar

Nisar 2021; Peeters and Campos 2021). Second, we call attention to regimes of burdens and the interplay between organizational factors and the experiences of administrative burdens by individuals. Although actions of the state and experiences of burden are distinct constructs (Baekgaard and Tankink 2022; Madsen, Mikkelsen, and Moynihan 2020), our findings demonstrate that slow or backlogged organizational processes can translate into an experience of passive compliance costs for individuals. When designing interventions to increase the flow of applicants into the system, such as streamlining application requirements, administrators should also consider agency capacity to process the flow of applicants through the system. Finally, our study is among a handful to examine the effects of administrative burden on the outcomes of individuals targeted for the program. In line with Mansai Deshpande and Yue Li (2019), we find evidence that reductions in compliance costs improve targeting efficiency, defined here as a reduced rate (and probability) of foreclosure among the pool of applicants.

THEORETICAL FRAMEWORK: COMPLIANCE COSTS, EQUITY, AND EFFECTIVENESS

In this study, we focus on persistence through the application process—from the initial expressed intent to apply to the ultimate receipt of benefits—and how this process affects who receives benefits and the subsequent program outcomes. The burdens experienced during this process are often referred to as compliance costs, defined as the “material burdens of following administrative rules and requirements,” including “time lost waiting in line, completing forms or providing documentation of status” (Herd and Moynihan 2018, 15). Numerous studies document the effects of arduous application processes, finding that more complex forms, larger amounts of required documentation, increases in the number of application steps, and long wait times are associated with reduced applicant persistence through the process (Deshpande and Li 2019; Herd et al. 2013; Foote, Grosz, and Rennane 2019; Godard, Koning, and Lindeboom 2019; Linos and Riesch 2020). Compliance costs may also interact with other

forms of administrative burden, such as learning and psychological costs. For example, the process of completing application steps may contribute to learning about program eligibility (Linós and Riesch 2020), and categorizing oneself as unemployed or self-employed may be associated with stigma and impose psychological costs (Moynihan et al. 2022).

We propose two theoretically distinct sources of compliance costs based on the degree of agency an individual has over an experienced burden at a particular stage in the application process (Peeters and Campos 2021). At some stages of the process, much of the agency is on the individual to take the next step through a complicated maze of actions. Although the state establishes procedures, such as creation of forms or documentation requirements, it is up to the individual to complete the paperwork and submit documentation. Human capital and cognitive resources are critical at this stage of the process to navigate information and discern program requirements (Christensen et al. 2020). The more complicated an individual’s situation and the fewer resources available to them, including human capital, the less likely they are to persist. For example, more stringent documentation processes to verify eligibility for disability benefits reduced take-up among individuals with mental health impairments and more difficult-to-document conditions (Godard, Koning, and Lindeboom 2019). We refer to this stage as incurring active compliance costs.

In other stages, the applicant’s primary task is to wait on the state to take action—to process paperwork, determine eligibility, and allocate benefits. At this stage, organizational red tape and state capacity constraints can create congestion and long wait times that individuals experience as administrative burden (Ali and Altaf 2021; Deshpande and Li 2019; Heinrich et al. 2022). Long wait times may be particularly burdensome for those in a state of crisis and already emotionally taxed. For example, individuals in need may be present-biased and less willing and able to persist through a lengthy process in exchange for uncertain benefits (Frederick, Loewenstein, and O’Donoghue 2002). Although individuals still have agency at this stage in the process, it is more directed at

navigating complex bureaucracies, and the extent of their agency depends in part on administrative capital, defined as applicants' "explicit or tacit knowledge of bureaucratic rules, processes, and behaviors" (Masood and Azfar Nisar 2021). We refer to this stage as incurring passive compliance costs.

The delineation between active and passive compliance costs allows for a theoretically richer examination of how human capital and behavioral constraints may come into play at different stages of the application process, affecting who persists and receives benefits. Traditional economic models assume that administrative burdens (ordeal mechanisms) lead to targeting efficiency, where those truly in need of benefits are more likely to persist through a burdensome process (Finkelstein and Notowidigdo 2019; Nichols and Zeckhauser 1982). However, a growing body of empirical research finds the opposite—that those who are most in need of benefits are more likely to be negatively affected by burdens (Bhargava and Manoli 2015; Deshpande and Li 2019; Godard, Koning, and Lindeboom 2019; Heinrich 2016). One of the reasons for this discrepancy is the oversimplification of burdens in the economic literature—without specifying theoretically distinct effects based on different sources of burdens and varying individual experiences of the same burden (Heinrich et al. 2022; Madsen, Mikelsen, and Moynihan 2020). Individuals may experience the same burden differently depending on underlying differences in human capital, administrative capital, motivation, and behavioral biases (Bertrand, Mullainathan, and Shafir 2004; Christensen et al. 2020; Masood and Azfar Nisar 2021).

This delineation between active and passive compliance costs serves pragmatic purposes. Much focus in the literature has been on reducing active compliance costs by simplifying forms, reducing paperwork requirements, and providing information and assistance to complete paperwork. Less focus has been on reducing passive compliance costs. Part of this may be due to ease of study—changes to forms or information are more amenable to experimental manipulation than changes to agency capacity. However, part may be the distinction between individual experiences of burdens

and state actions that contribute to burdens (Baekgaard and Tankink 2022; Madsen, Mikelsen, and Moynihan 2020). The study of burdens within government agencies is a separate literature, including research on organizational red tape (Bozeman and Feeney 2011; Bozeman, Reed, and Scott 1992; Pandey and Scott 2002) and managerial process reforms (Boyne and Walker 2002; Damanpour, Walker, and Avellaneda 2009). Thus some may argue that passive compliance costs are out of scope for studies of administrative burden. However, management reforms that streamline internal processes or simplify red tape may reduce congestion and be experienced as shorter wait times, thus increasing the likelihood of individuals persisting through the application process.

Rather than viewing active and passive compliance costs as independent, we expect that any application process has a combination of both at different stages. Also, burdens can shift between the individual and the state (Herd and Moynihan 2018), though shifting burdens to the state will not necessarily reduce administrative burdens for individuals. Certainly, states can intentionally impose costs on individuals in the application process as policymaking by other means (Agarwal et al. 2017; Herd and Moynihan 2018; Linos and Riesch 2020; Moynihan, Herd, and Ribgy 2016; Ali and Altaf 2021; Doughty and Baehler 2020). However, even well-intended efforts to reduce administrative burdens to individuals who do not sufficiently invest in internal capacity or address red tape may simply be exchanging one type of administrative burden for another—from active compliance costs of filling out complex paperwork to passive compliance and psychological costs to endure excessive delays.

POLICY BACKGROUND

This article examines outcomes associated with active and passive compliance costs in the context of a foreclosure prevention program. In times of economic crisis, such as the Great Recession that began in 2008 or the COVID-19 pandemic that began in early 2020, massive waves of unemployment and economic downturn result in people being unable to pay their bills. The largest bill for most households in

the United States is housing, and for the 65 percent of U.S. households who own a home (U.S. Census Bureau 2022), this expense most often takes the form of a mortgage payment to a private lender. Failure to make mortgage payments results in the loan being in default. If nonpayment continues, the lender will foreclose on the property, a process during which the homeowner is evicted.

The direct and indirect costs of foreclosures for households and communities (Diamond, Guren, and Tan 2020) motivate a variety of policy responses to help prevent mortgage defaults. During the Great Recession, the federal government allocated more than \$45 billion to help distressed homeowners (U.S. Department of the Treasury 2017). Yet such policies often rely on the voluntary take-up of interventions by individual homeowners who are experiencing substantial distress as well by as the voluntary participation of private lending institutions. Not surprisingly, foreclosure prevention programs end up being underused by the people who may benefit the most, with programs being criticized for serving too few homeowners in a time of crisis (Agarwal et al. 2017; Special Inspector General 2015b, 2015a). A Special Inspector General report (2015b) indicates that the more than one million homeowners, a quarter of all denied requests, were denied assistance under the Home Affordable Mortgage Program (HAMP) because the homeowner failed to provide “the financial and/or hardship verification documentation required to complete the evaluation of their request in a timely manner”—not because the homeowner was ineligible for assistance.

Some of the administrative burdens in the foreclosure prevention process are intentional. As with other need-based benefit programs, such as unemployment or disability insurance programs, moral hazard and fraud are concerns. Ideally, mortgage assistance programs aim to help homeowners who would otherwise default on their mortgage absent the intervention, but with the intervention will be able to resume making timely payments. Yet the intervention could induce homeowners to default in order to qualify for assistance (moral haz-

ard), crowding out limited subsidies for homeowners who truly need and would benefit from the assistance (Mayer et al. 2014). In an extreme case, fraud could also be possible when individuals or lending institutions falsify or withhold information to obtain—or prevent people from obtaining—benefits (Karikari 2013).

In light of these concerns, mortgage assistance programs historically include an onerous screening process to verify the presence of a hardship and to evaluate the likelihood of resuming payments when assistance ends. However, recent research suggests that appropriately designed streamlined processes can increase take-up among distressed homeowners without evidence of extensive moral hazard or fraud (Farrell, Greig, and Zhao 2020; Goodman, Scott, and Zhu 2018). For example, in response to the 2020 COVID-19 pandemic, the federal government announced that federally insured or securitized mortgages, about 80 percent of the market, could receive a temporary suspension of their mortgage payments for up to eighteen months if they experience a COVID-related financial hardship—with no documentation of hardship or lengthy application process.¹ Despite more than 9 percent of U.S. homeowners taking advantage of forbearance in 2020, preliminary research does not find evidence of moral hazard or fraud (Farrell, Greig, and Zhao 2020).

STUDY CONTEXT

The study context for this article is the HHF foreclosure prevention program. HHF was administered through state housing finance agencies during the Great Recession, assisting more than 418,000 homeowners with total federal funding of \$8.8 billion from 2010 through the end of the program in 2020 (U.S. Department of the Treasury 2021). Although some of the assisted homeowners received mortgage modifications, most received temporary mortgage payment assistance, under which government subsidies were used to pay mortgage payments during a spell of unemployment. Given the assistance was structured as a subsidy, federal guidelines required states to verify homeowner eligibility—including documentation of

1. Coronavirus Aid, Relief, and Economic Security (CARES) Act, Pub. L. No 116-136 (2020).

hardship. Eligibility criteria were similar across states but showed some variation in the maximum allowable household income and mortgage balance.² Government reports on HHF describe difficulty getting money in the hands of homeowners in part because of excessive administrative burden. In 2015, the Special Inspector General for the Troubled Asset Relief Program (2015a) released a scathing report titled “Homeowners Have Struggled with Low Admission Rates and Lengthy Delays in Getting Help from TARP’s Second-Largest Housing Program—The Hardest Hit Fund,” finding that only 43 percent of homeowners who applied for HHF since 2010 had received assistance as of June 30, 2015, and that the median wait time was six months. Ohio’s program was singled out as a program with substantial delays. Research indicates that, despite lower than intended take-up rates and delays, those who did receive HHF assistance were 40 percent less likely to experience foreclosure on their homes three years after rolling off assistance (Moulton et al. 2022).

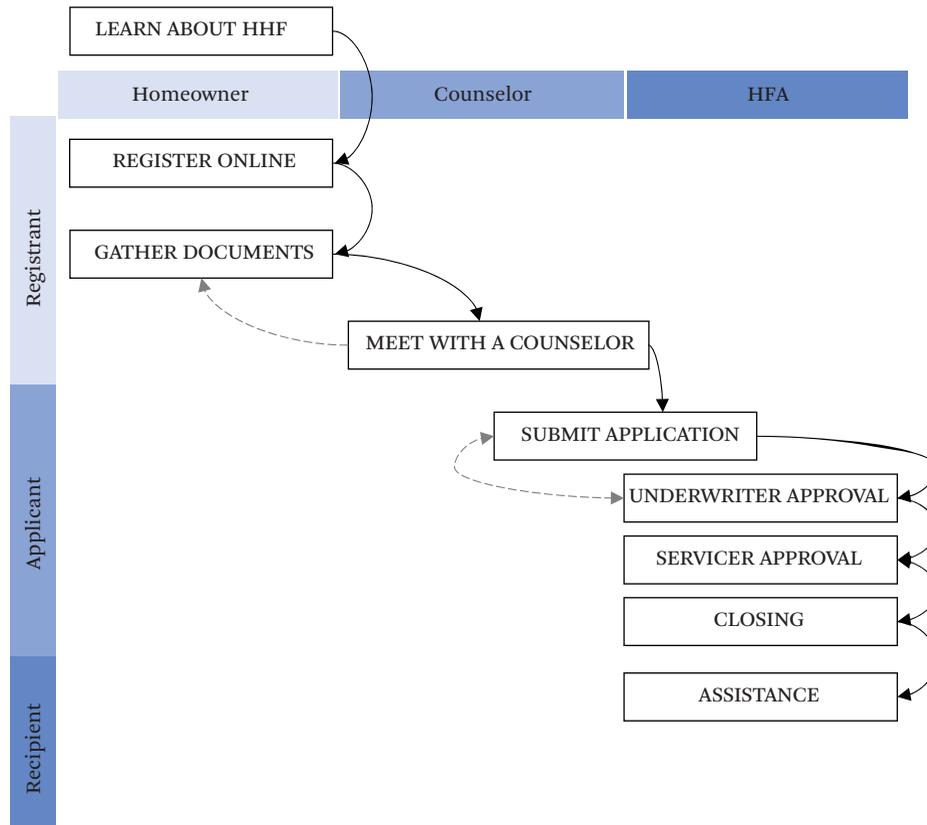
The Ohio Housing Finance Agency (OHFA) launched Ohio’s HHF program on September 27, 2010. Ohio was one of eighteen states along with the District of Columbia to receive federal funding under the Department of Treasury’s HHF program, receiving the third largest allocation of federal HHF dollars of any state. Ohio was selected for the program because of high unemployment, which resulted in thousands of homeowners being unable to afford their mortgage payments (U.S. Department of the Treasury 2010). Program administrators estimated that the state’s initial allocations would only be able to serve a small fraction of the homeowners at risk of foreclosure (OHFA 2011, 13). They therefore initially designed several rules to limit eligibility (OHFA 2010). Given the rapidly rising number of foreclosures in the state, agency administrators were under pressure to design and implement the program quickly, and thus the agency drew on eligibility,

documentation, and capacity processes that were already in place for other mortgage assistance programs.

In practice, the program that launched in September 2010 involved several steps homeowners had to complete before receiving assistance from Ohio’s HHF program (see figure 1). First, homeowners became registrants by visiting the HHF website and entering their name, Social Security number, county, and email address. At this point, registrants continued their online registration, which involved seven pages of questions about their demographic characteristics, financial situation, mortgage, property, and hardship. Once the online registration was complete, registrants printed their registration packet and submitted it to a housing counselor along with additional documents to demonstrate their mortgage amount, proof of ownership, income, and financial hardship. Registrants were assigned to a housing counselor, typically at a local nonprofit organization, to verify eligibility and submit applications on homeowners’ behalf. Registrants could not submit their own applications to OHFA, which created additional delays when housing counselors were backlogged with cases.

Once a housing counselor submitted a registrant’s application, the registrant became an applicant. Underwriters at OHFA were tasked with reviewing applications and requesting additional documentation if applications were incomplete or if submitted documentation was deemed insufficient. After an applicant was determined eligible, OHFA contacted the applicant’s mortgage servicer to request servicer approval. If the servicer approved the applicant, OHFA arranged a closing with a third-party title company. After the closing, the applicant became a recipient when the first payment was sent to the homeowner’s mortgage servicer. The first part of the process, during which a registrant completed the required steps to become an applicant, was largely associated with

2. Income limits ranged between 115 percent area median income (AMI) in Ohio to no income limits in New Jersey and North Carolina. Unpaid mortgage balance limits ranged from \$275,000 in Tennessee to \$729,750 (the government-sponsored enterprise conforming limit for a one-unit property) in several states. Eligibility criteria became more generous over time in most HHF states.

Figure 1. Ohio HHF Application Process

Source: Authors' tabulation.

active compliance costs; the second part, during which the applicant waited on OHFA and the servicer to process and approve the application, was mostly characterized by passive compliance costs.

By mid-2012, Ohio HHF administrators were concerned about the time it was taking HHF registrants to move through the process and the low percentage of registrants who ultimately received assistance. At the time, the registration to application pull-through rate was 29.7 percent, the application to assistance pull-through rate was 48.6 percent, and the average length of time from registration to funding was 173 days (LeanOhio 2012). HHF administrators consulted with LeanOhio, a state agency tasked with helping other state agencies improve program efficiency through analyzing work processes and identifying ways to make them sim-

pler, faster, and less expensive (LeanOhio 2022). LeanOhio was based on the Lean Six Sigma model, a total process improvement model that began in the private business sector and permeated government by the early 2000s (Maleyeff 2007; Radnor 2010). By the end of a week-long LeanOhio event, HHF administrators decided to implement several process and policy changes to improve pull through, reduce processing times, and increase program generosity (LeanOhio 2012; Garver and Alston 2013). Table 1 describes the administrative reforms conceived at the 2012 LeanOhio event that were implemented on February 1, 2013. We classify changes by the associated sources of administrative burden they were designed to target.

In this study, we are interested in the outcomes of administrative reforms to reduce active and passive compliance costs. We thus

Table 1. Ohio HHF Program Administrative Reforms Introduced February 1, 2013

Administrative Reform	Description
Pre-registration learning costs	
Marketing and rebranding	OHFA updated its HHF program branding and boosted its marketing. This included integrating the HHF website so that program information and access to the pre-screening tool and online registration were on a single website. OHFA also developed new commercials and designed and released new print materials.
Eligibility pre-screening	Potential registrants had to complete and pass an online pre-screening questionnaire to access the full, online registration.
Active compliance costs	
Attestation for hardship	During post-regime 1, registrants no longer had to submit paperwork to document their hardship. Instead, they simply had to attest to their hardship by describing it in a signed hardship letter, which was something they also had to do prior to the reforms.
Revised online registration	OHFA staff updated the online registration packet to make the packet and process easier to read. The revised registration packet included clear instructions on which supporting documents would be needed to complete the registration.
Expanded consumer advocacy center	To improve support for registrants completing their online registration, OHFA expanded the number of staff members working in its Consumer Advocacy Center to assist housing counselors and registrants.
Passive compliance costs	
Streamlined internal processes	The original internal workflow for processing HHF applications had 127 steps, 29 handoffs, and 32 decision points. The revised process (post-regimes) had 71 steps, 18 handoffs, and 18 decision points.
Expanded benefits	
New programs	OHFA introduced two new HHF programs. The recast program allowed homeowners to use up to \$35,000 to pay down their unpaid mortgage balance and reamortize to achieve a lower monthly payment. The Homeownership Retention Assistance program allowed homeowners to use up to \$25,000 to pay off a junior mortgage lien.
Increased maximum benefit	The maximum benefit amount for the program increased from \$25,000 to \$35,000. The maximum amount that could be used per program remained at \$25,000, but homeowners could access an additional \$10,000 for other program types.
Increased months of mortgage payments	The maximum number of months a homeowner could receive mortgage payment assistance increased from fifteen to eighteen.

Source: Authors' tabulation based on OHFA HHF program documents (LeanOhio 2012; Ohio Housing Finance Agency 2012; Garver and Alston 2013; Ohio Housing Finance Agency 2013).

focus on the stage in the process after homeowners initially registered for HHF assistance. Changes to program marketing and pre-registration screening primarily targeted *learning costs* before beginning the registration and application process. In regard to *active compliance costs*, program administrators eliminated the requirement for homeowners to provide supporting documentation to demonstrate their financial hardship. Such documentation was particularly burdensome for people with hardships other than an Unemployment Insurance (UI) claim—such as wage loss, death, disability, divorce, or significant medical expenses, or who were involuntarily unemployed but did not for various reasons qualify for UI. Treasury approved Ohio’s elimination of hardship documentation but required OHFA to audit 10 percent of homeowners who received HHF assistance each month—verifying their stated hardship with documentation (OHFA 2013). By the end of 2013, there was concern that a high share of audited recipients had failed the documentation test, causing OHFA to reinstate hardship documentation for all registrants beginning in January 2014 (OHFA 2015a, 11).

OHFA implemented other changes to reduce active compliance costs, including revising the online application form and expanding its Consumer Advocacy Center to proactively help registrants complete their applications. It also reduced passive compliance costs by substantially reducing the number of internal steps required of OHFA underwriters to process applications. Finally, it expanded benefit generosity by adding new types of assistance, increasing the maximum benefit amount, and extending the duration of benefits. These changes remained in effect after the January 2014 reinstatement of the documentation requirements.

The introduction and subsequent rollback of administrative reforms resulted in three distinct regimes of burdens experienced by homeowners seeking assistance through Ohio’s HHF program. The pre-regime is the period before any of the administrative reforms listed in table 1, that is, before February 1, 2013. Post-regime 1 is the initial period after the introduction of most of the reforms in table 1, including the

removal of hardship documentation, from February 1, 2013, until January 1, 2014. Post-regime 2 is the period after the reinstatement of the hardship documentation requirements while continuing the other administrative reforms and increasing the maximum benefit amount, on or after January 1, 2014. We expect both post-regimes to be associated with an increase in registrant pull-through rates and a decrease in foreclosure rates relative to the pre-regime. To the extent that removal of hardship documentation requirements creates congestion, we expect that post-regime 1 may be associated with longer processing times, lower pull-through rates, and higher foreclosure rates than post-regime 2. On the other hand, to the extent that applicant documentation requirements were the primary burden affecting pull through in the HHF program, we expect post-regime 1 to be associated with better outcomes than post-regime 2.

In line with the literature that finds applicants with complex cases are more negatively affected by compliance costs (Godard, Koning, and Lindeboom 2019), we hypothesize that the reduction in compliance costs associated with both post-regimes will affect registrants with complex hardships more than those with less complex hardships. In the HHF context, registrants with verified UI claims were able to prove their hardship more easily and with less documentation than homeowners with other types of hardships. Registrants with recently successful UI claims may also have more “administrative capital” to navigate complex bureaucratic processes than registrants without UI claims (Masood and Azfar Nisar 2021), and thus may be less affected by reforms to streamline the process or to provide applicant support.

DATA AND METHODS

The primary source of data for this analysis is Ohio HHF administrative records provided by the state agency. The records include self-reported demographic, financial, hardship, mortgage, and property information on everyone who started the registration process between 2010 and 2015. Our analysis focuses on the 68,460 households that registered for HHF between September 2011 and February 2015,

when the program stopped accepting new registrations.³

The second source of data comes from the Ohio Department of Job and Family Services, which is the state agency that administers the UI program and collects wage and employment records on people who work in Ohio.⁴ The data, provided by the Ohio Longitudinal Data Archive (OLDA),⁵ includes information on total wages paid and hours worked by employer, UI wages, and UI claims by quarter from 2009 to 2016. The employment data was linked to OHFA administrative records using Social Security number and deidentified prior to being shared with the authors. The third source of data comes from CoreLogic. The CoreLogic data comprise public property tax records and recorded transactions associated with each borrower-property combination, such as mortgage liens, sales, and foreclosure activity. CoreLogic matched this data to the Ohio HHF administrative records using address and homeowner name prior to de-identifying and sharing with the authors.

We focus our analysis on homeowners who registered for Ohio's HHF program. Recall that a *registrant* is anyone who started the online application process for Ohio's HHF program. We exclude registrants who did not complete all seven pages of their online registration packet, which allows us to focus on policy changes that may affect applicant pull through rather than changes to streamline the online registration process. We also drop registrants

whose registration data suggest they were not eligible for assistance due to property or mortgage requirements, and we exclude those who repaid all of their HHF assistance or who owed a repayment to OHFA.⁶

Just over 73 percent ($N = 50,431$) of registrant households remain after applying these exclusions. To align our final samples and isolate the effects of changes to compliance burdens rather than expanded eligibility or benefits, we apply pre-regime eligibility criteria to all registrants, ensuring that registrants in the post-regimes would have qualified for HHF under the pre-regime criteria. Eligibility criteria that became more generous in both post-regimes include percent area median income (AMI), and the Federal Housing Administration (FHA) lending limit. Post-regime 2 also included an increase in the maximum benefit amount, from \$25,000 to \$35,000. However, the benefit amount received was still a function of applicant need based on the size and amount of past-due mortgage payments. We thus run predictive models to estimate the maximum benefit required by a registrant and limit the analysis sample to those with predicted benefit amounts of \$25,000. This and the other exclusions described here increase our confidence that observed changes in outcomes of interest relate to changes in compliance burdens rather than to changes in program generosity.⁷ Our final analysis sample comprises 44,140 people who registered for assistance in the pre-regime or post-regimes 1 and 2.

3. We exclude the first year of the program—September 2010 to August 2011—because OHFA implemented other programmatic changes during the first year of operations that are not the focus of this analysis.

4. Self-employed individuals and people employed by the federal government are excluded from the wage data.

5. The OLDA is a project of the Ohio Education Research Center and provides researchers with centralized access to administrative data. It is managed by CHRR at The Ohio State University in collaboration with Ohio's state workforce and education agencies (ohioanalytics.gov), with those agencies providing oversight and funding. For more information, including on project sponsors, see the OLDA website (<https://chrr.osu.edu/projects/ohio-longitudinal-data-archive>).

6. Approximately 12 percent ($N = 8,277$) of households did not complete the entire online registration packet. Another 14 percent ($N = 9,752$) were excluded from the sample for missing data or for failing to meet eligibility criteria. These restrictions exclude 272 people who were overpaid and owed funds to OHFA, 781 people with ineligible property types, 12,175 who did not have an active mortgage at the time of registration. Some people were excluded for more than one reason. We dropped a total of 18,029 households at this stage.

7. Of registrants, 2,369 exceeded pre-reform AMI limits, 147 exceeded the pre-reform FHA limit, and 3,775 had predicted benefit amounts that exceeded \$25,000.

Table 2. Summary Statistics, HHF Registrant Sample

	Full Sample (1)	Receiving Unemployment Insurance (2)	Not Receiving Unemployment Insurance (3)
Pull-through rates (mean)			
6-month registration to application	0.36	0.46	0.29
12-month registration to assistance	0.27	0.38	0.20
12-month application to assistance	0.72	0.8	0.66
3-year foreclosure rate (mean)	0.15	0.12	0.17
Processing times (median days)			
Registration to application	63	55	70
Application to assistance	101	97	107
Registration to assistance	183	168	202
Mortgage characteristics			
Percent AMI (mean)	0.42	0.39	0.45
Mortgage amount (\$, mean)	118,410.90	119,231.87	117,918.06
History of delinquency (share)	14.68	12.24	16.15
Self-reported foreclosure (share)	17.46	13.41	19.89
Demographic characteristics			
Age (mean)	48.36	47.28	49.01
Female (share)	52.87	45.51	57.31
Race (share)			
White	72.93	77.91	69.93
Black	24.07	19.11	27.06
Other race	3.00	2.98	3.01
Hispanic (share)	2.64	2.54	2.70
Married (share)	47.17	53.32	43.47
Observations	44,140	16,581	27,559

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Note: Summary statistics for all model variables are presented in in table A.1.

After constructing our main sample, we use information on UI claims to split our registrant sample into two groups: registrants with a verified UI claim (UI registrants) and registrants without a verified UI claim (non-UI registrants). To do this, we create an indicator for any adult in the household having a verifiable UI claim in the linked OLDA data. Table 2 provides summary statistics for our final samples. On average, 27 percent of registrants received HHF assistance within twelve months of completing registration, though just 20 percent of non-UI

registrants received assistance versus 38 percent of UI registrants. Approximately 15 percent of registrants had foreclosure activity—defined as any foreclosure activity recorded in property records, including ninety-day default, foreclosure filing, judgment, or foreclosure sale—that occurred within three years after registration.⁸ The median processing time between registration and receipt of HHF assistance was 183 days for the full sample, 168 days for UI registrants, and 202 days for non-UI registrants. The median time between registration and application

8. We exclude the first six months after registration from our foreclosure rate calculation to exclude foreclosure activity that may have occurred while a registrant was completing the HHF application process.

was shorter than that between application and receipt (sixty-three and 101 days, respectively), suggesting that HHF recipients spent about two-thirds of the application process experiencing passive compliance costs in the form of wait time.

Differences between registrants with and without a UI claim are notable. Women made up fewer than 50 percent of UI registrants but more than 57 percent of non-UI registrants. Similarly, Black registrants made up 27 percent of non-UI registrants and just 19 percent of UI registrants. The percentage of UI registrants reporting that they were married was also higher than that of non-UI registrants (53 percent and 43 percent, respectively).

We conduct a series of simple regressions to identify whether any demographic and economic differences in new registrants across policy regimes are statistically significant. Table A.2 presents several differences. For instance, registrants were slightly older in post-regimes 1 and 2 than in the pre-regime, and the share of Black registrants decreased in later regimes. New registrants had slightly less income (measured as percent AMI) in the post-regimes and higher debt-to-income ratios but were less likely to report a prior bankruptcy or an active foreclosure. These differences likely reflect changes in the nature of the foreclosure crisis as the economy began to recover from the Great Recession (Chun, Pierce, and Van Leuven 2021; Immergluck 2015). The methods we describe in the next section attempt to address these evolving differences in two ways. Our first approach examines marginal differences in outcomes just before and after the introduction of a new policy regime. The second controls for a rich set of demographic and economic characteristics.

METHODS

We use two modeling approaches to examine the relationship between regimes and program outcomes. The first uses a single-group ITSA model, which accounts for the autoregressive nature of the data organized by time (Hartmann et al. 1980). For this analysis, we use a single-group model with three phases—pre-regime, post-regime 1, and post-regime 2—as

Ariel Linden (2017, 2015) describes. The main ITSA model takes the following form:

$$Y_t = \beta_0 + \beta_1 T_t + \beta_2 POST_{1t} + \beta_3 POST_{1t} T_{1t} + \beta_4 POST_{2t} + \beta_5 POST_{2t} T_{2t} + \varepsilon_t \quad (1)$$

$$\varepsilon_t = \rho \varepsilon_{t-1} + u_{1t} \quad (2)$$

where Y_t represents the aggregated dependent variable at month t . We model five dependent variables: the HHF pull-through rate (receipt of HHF assistance within twelve months of initial registration), the foreclosure rate (foreclosure activity within three years of initial registration), the median processing time between registration and application, the median processing time between application and HHF receipt, and the median processing time between registration and HHF receipt. In alternative specifications, we model the application rate (the share of registrants who submit a complete application within six months). T_t denotes the time, in months, since the start of the study period. $POST_{1t}$ and $POST_{2t}$ are indicators representing post-regimes 1 and 2. $POST_{1t} T_{1t}$ and $POST_{2t} T_{2t}$ are interaction terms. β_0 is the coefficient for the intercept or starting level for the dependent variable. β_1 is the coefficient for the slope of the outcome variable until the introduction of the intervention. β_2 and β_4 denote the change that occurs in the month immediately following the introduction of the post-regimes 1 and 2, respectively, relative to the prior regime. β_3 and β_5 represent the difference between the pre-regime and post-regime 1 slopes of the dependent variable, and the post-regime 1 and post-regime 2 and slopes of the dependent variable, respectively. The random error term, ε_t , follows a first-order autoregressive process, such that ρ is the coefficient between error terms at time $t - 1 + u_{1t}$ and are independent disturbances (Linden 2015). We use a general specification test of serial correlation to confirm the inclusion of a single autoregressive lag (AR1) (Baum and Schaffer 2013; Cumby and Huizinga 1992). Finally, for the ITSA model, we exclude the two months prior to the start of post-regime 1, given evidence of strategic behavior in the lead-up to the policy change (see figure 2). In addition to estimating the overall rate of the outcomes, we

also estimate the pull-through and foreclosure rates separately for people with and without a verified UI claim.

Although the ITSA model allows us to isolate changes in outcomes associated with the introduction of each regime in short time increments, we are unable to control for registrant characteristics that may shift with each regime and affect program outcomes. To control for individual characteristics, we estimate a series of linear probability models. The main LPM is as follows:

$$Y_i = \beta_0 + \beta_1 POST1 + \beta_2 POST2 + \chi_i + \varepsilon_i \quad (3)$$

where Y_i represents the probability that a registrant receives HHF assistance within twelve months after starting the initial application and, alternatively, the probability that the registrant experiences foreclosure activity within three years after starting the initial application. In alternative specifications, we also examine the probability that a registrant submits a complete application within three, six, and nine months. In all specifications, we include dummy indicators for beginning the application (thus becoming a registrant) during post-regime 1 or post-regime 2 (omitted category is the pre-regime), where the coefficients (β_1 or β_2) represent the change in the probability of the outcome associated with a respective regime. We include a vector of covariates (χ_i) at the time of initial application such as race, ethnicity, gender, age, education, household size, percent AMI, hardship, debt-to-income ratio, mortgage amount, year the home was built, square footage, and acreage. In alternative specifications, we add interaction terms between the regime indicators and the indicators for race, gender, and age to test for heterogeneous effects. We control for history of past mortgage delinquency or foreclosure actions found in property records, as well as having received a fore-

closure notice, which was self-reported by registrants in their initial applications. We include controls for self-reported hardship type.⁹ Finally, we control for the county-level unemployment rate by month to account for macro-level trends over time and across counties. ε_i is the error term.

RESULTS

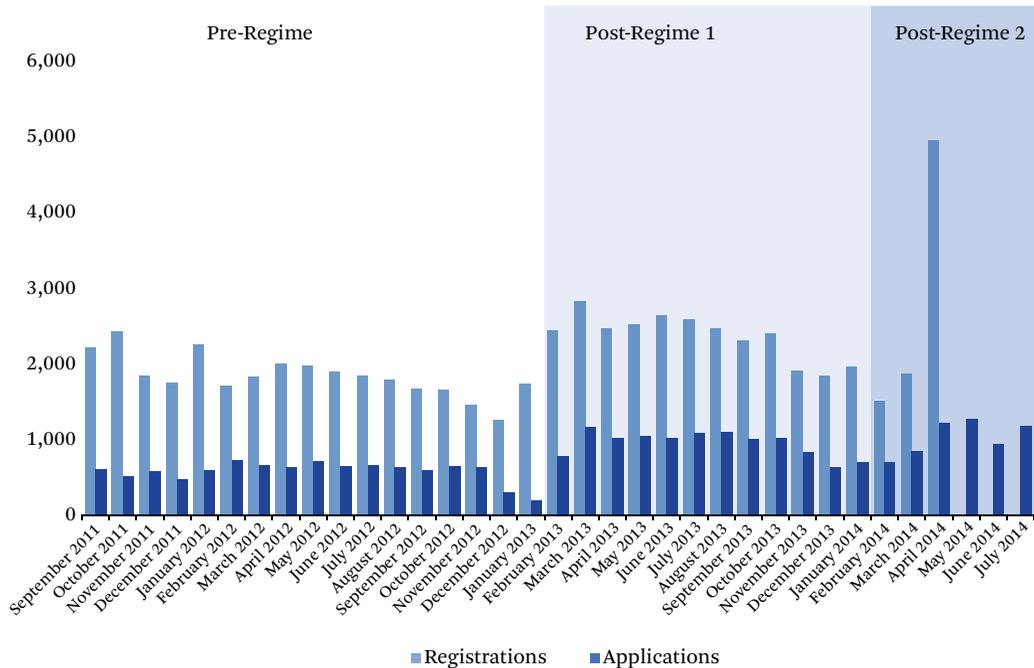
Figure 2 graphs the total number of households that began the registration process or submitted applications by month during our study period.¹⁰ The number of applications submitted in the two months before the start of post-regime 1 decreases significantly, corresponding to an announcement from OHFA that the administrative reforms were forthcoming—resulting in people delaying applications until after the changes took effect. Following the launch of post-regime 1, the number of submitted applications surged by 280 percent in February 2013. Post-regime 1 also coincided with a 42 percent increase in the monthly number of registrations, likely tied to increased advertising that accompanied the launch of the new policy regime (Garver and Alston 2013). We drop the two months before the post-reform regimes from our ITSA analysis given the strategic behavior of applicants following the reform announcement.

ITSA RESULTS

Table 3 displays the results of the ITSA specifications. We find a statistically significant relationship between post-regime 1 and each of the dependent variables of interest. The HHF pull-through rate increased by 4.1 percentage points, a 22.7 percent increase over the pre-regime pull-through rate ($p < .01$), and the foreclosure rate decreased by 1.6 percentage points during the three years following HHF registration ($p < .05$). The application pull-through rate increased by 3.4 percentage points, or 12 per-

9. Although we split our samples by those with an observed UI claim and those without, the self-reported hardship controls for those who are unemployed or who have an unemployed household member but are missing from the UI claim data, such as those who were unemployed from jobs in other states.

10. The spike in registrations in April 2014 is an artifact of the wind-down of Ohio's HHF program. April 2014 was the last month the program accepted new registrations, which led to a surge in registrations as counseling agencies, housing advocates, and local media encouraged homeowners to register before the deadline.

Figure 2. HHF Registrations and Applications by Month

Source: Authors' tabulation based on Ohio HHF administrative data (OHFA 2015b).

Note: The total registrations (68,460) and applications (28,296) by regime.

cent, ($p < .05$) at the beginning of post-regime 1 (for ITSA results on the application rate, table A.3). Following the introduction of post-regime 2, pull-through rates once again increased, and registrant foreclosure rates decreased.

When we split the registrant sample by whether or not they had a UI claim, we see that the post-regime indicators are only statistically significant for non-UI registrants. For this group, the pull-through rate increased by 5.1 percentage points, or 56.7 percent, following the introduction of post-regime 1. The application rate increased by 4.1 percentage points—20.5 percent, and the foreclosure rate decreased by 2.7 percentage points, or 11.3 percent, for non-UI registrants at the start of post-regime 1. Similarly, non-UI registrants saw a significant increase in the pull-through rate and a marginally significant decrease in the foreclosure rate following post-regime 2 after hardship documentation was reinstated. This finding indicates that it is not simply the removal of hardship documentation that is associated with improved outcomes for registrants without UI claims, but also the bundle

of reforms to reduce both active and passive compliance costs more broadly.

Table 4 reports the results of the ITSA on processing times. The median overall processing time from registration to receipt increased with the introduction of post-regime 1 by 26.8 days, or 13.9 percent ($p < .01$). When we break out the overall processing time into two parts—registration to application versus application to receipt—we find that the effect appears to be driven by the latter. We find that the median time between application and receipt increased by 28.6 days, or 29.5 percent ($p < .01$). Recall that we also observed a 42 percent increase in the number of new registrants at the beginning of post-regime 1. The reinstatement of hardship documentation (post-regime 2) is associated with a reduction in overall processing time of 20.7 days—nearly offsetting the increase in processing time associated with post-regime 1. Taken together, these findings suggest that the influx of applications after the initial launch of the reforms (post-regime 1) may have overwhelmed agency capacity, leading to congestion despite the agency's attempts to reduce

Table 3. Interrupted Time Series Results, HHF Registrants

Variables	Full Sample		Receiving Unemployment Insurance		Not Receiving Unemployment Insurance	
	(1)	(2)	(3)	(4)	(5)	(6)
	Receipt	Foreclosure	Receipt	Foreclosure	Receipt	Foreclosure
Time	0.006*** (0.001)	-0.004*** (0.001)	0.008*** (0.002)	-0.004*** (0.001)	0.007*** (0.001)	-0.004*** (0.001)
Post-regime 1	0.041** (0.012)	-0.016* (0.006)	0.026 (0.023)	0.002 (0.011)	0.051*** (0.011)	-0.027** (0.010)
Post-regime 1 x time	-0.009*** (0.002)	0.004*** (0.001)	-0.012*** (0.003)	0.003 (0.002)	-0.01*** (0.001)	0.004*** (0.001)
Post-regime 2	0.049*** (0.012)	-0.018* (0.007)	0.035 (0.023)	-0.016 (0.010)	0.048*** (0.011)	-0.02* (0.009)
Post-regime 2 x time	0.014*** (0.003)	-0.004 (0.004)	0.000 (0.005)	-0.006 (0.005)	0.015* (0.006)	0.000 (0.003)
Constant	0.181*** (0.007)	0.213*** (0.005)	0.286*** (0.013)	0.182*** (0.004)	0.09*** (0.011)	0.239*** (0.009)
Mean	0.260	0.156	0.379	0.128	0.189	0.174
Observations	30	30	30	30	30	30

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Note: Additional results for the application rate are presented in table A.3.

Standard errors in parentheses.

* $p < .05$; ** $p < .01$; *** $p < .001$

Table 4. Interrupted Time Series Results for Processing Times, HHF Registrants

Variables	(1)	(2)	(3)
	Median Days from Registration to Application	Median Days from Application to Receipt	Median Days from Registration to Receipt
Time	-0.568 (1.021)	0.041 (0.372)	-0.895 (1.103)
Post-regime 1	-5.845 (9.307)	28.550** (7.938)	26.821** (9.394)
Post-regime 1 x time	1.841 (1.114)	-3.123* (1.262)	-1.305 (1.255)
Post-regime 2	-5.245 (3.003)	-9.795 (6.664)	-20.864** (7.204)
Post-regime 2 x time	-6.973*** (0.750)	4.932** (1.390)	-2.500 (2.059)
Constant	70.908*** (7.447)	96.879*** (3.625)	192.963*** (11.431)
Mean	64.100	100.500	185.550
Observations	30	30	30

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Note: The constant represents the starting median processing time during the pre-regime.

* $p < .05$; ** $p < .01$; *** $p < .001$

applicant wait times. Interestingly, we observe little association between post-regime 1 and the time between registration and application, such that the median days decreases slightly, but the effect is not statistically significant.

We visualize the effects of the administrative reforms on the aggregate outcomes in figure 3, which displays the ITSA results for the HHF pull-through rate for the full sample and for UI and non-UI registrants. We see a similar pattern for each, such that the pull-through rate increases during the months prior to the first reform, in February 2013. However, the pull-through rate declines for each sample during post-regime 1, an effect that may stem from the influx of new registrants and shifting documentation burden from the applicant to the state. Post-regime 2 marks another increase in the pull-through rate for each sample, followed by a statistically significant increase in pull through for the remaining months of the program. The change in slope following post-regime 2 is not statistically significant for UI registrants.

LPM REGRESSION RESULTS, INDIVIDUAL LEVEL

Table 6 presents the results from our individual-level LPM regressions that include controls for registrant characteristics as well as changes in unemployment rates in the macro-economy.¹¹ The results from the LPM are substantively similar to the ITSA model results.¹² We find that both post-regimes are associated with a significant increase in the probability of a registrant receiving HHF assistance within twelve months relative to the omitted baseline period. Specifically, post-regime 1 is associated with a 4.5 percentage point ($p < .001$) increase in the probability of a registrant receiving HHF assistance, whereas post-regime 2 is associated with a 9.1 percentage point increase ($p < .001$), all else constant. Turning to program outcomes, we find that post-regime 1 is associated with a 2.8 percentage point (19 percent) decrease in the

probability of experiencing foreclosure activity ($p < .001$), and that post-regime 2 is associated with a 5.0 percentage point (33 percent) decline ($p < .001$). To put these effect sizes in context, reported wage loss at the time of registration is associated with a 2.0 percentage point increase in the probability of foreclosure ($p < .001$) and having a four-year college degree is associated with a 3.7 percentage point reduction ($p < .001$).

Like the ITSA model results, the LPM results differ when we split our registrant sample by whether they had a verified UI claim. Whereas the post-regimes are associated with a significant increase in the probability of registrant pull-through and reduction in the probability of foreclosure for both the UI and non-UI registrant subsamples, the effect sizes are larger for the non-UI registrant sample. For non-UI registrants, post-regime 1 is associated with a 6.1 percentage point (30 percent) increase in the probability of receiving HHF assistance, relative to a 3.7 percentage point (10 percent) increase for the UI registrant sample. Post-regime 2 is associated with an even larger 11.8 percentage point (59 percent) increase in the probability of receiving HHF assistance for non-UI registrants, relative to a 5.3 percentage point (14 percent) increase for the UI registrant sample. Similar to the findings from the ITSA, non-UI registrants experienced an additional boost in their pull-through rate when the documentation requirement was reinstated, indicating that the no-documentation reform was not driving the effects for post-regime 1.

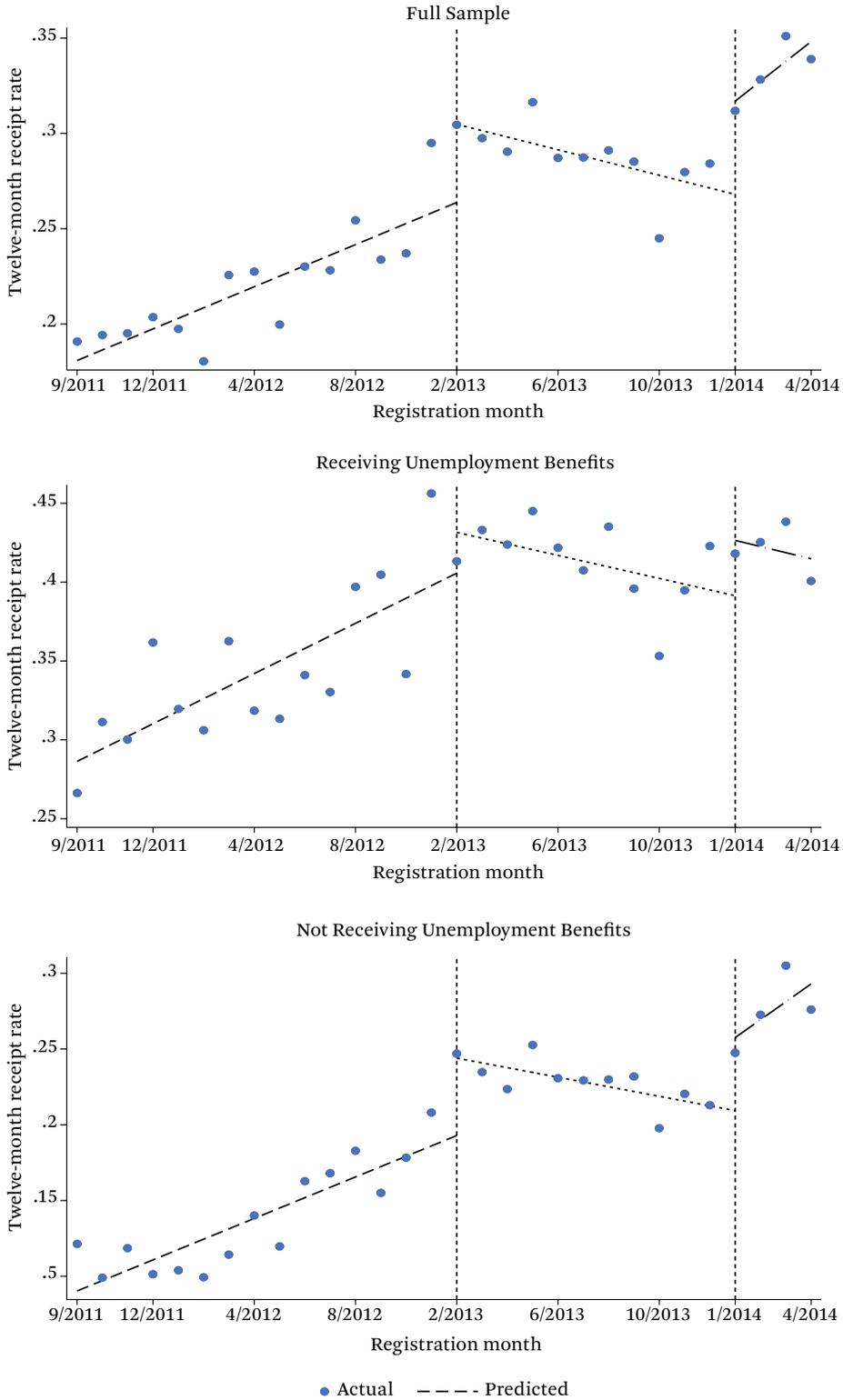
In regard to the probability of foreclosure, post-regime 1 is associated with a larger reduction for non-UI registrants than UI registrants (-3.4 versus -1.9 percentage points). Post-regime 2 is associated with an even larger decrease, the effect sizes being similar for non-UI and UI registrants (-4.7 versus -5.0 percentage points).

The LPM allows us to test for heterogeneous effects of the policy regimes on outcomes by gender, race, and age by running a second set of models that interact the regime indicators

11. Table 5 presents an abbreviated set of results. Table A.4 presents the same model with all control variables shown.

12. The post-regime 2 coefficients are larger for the LPM than the ITSA results in part because post-regime 2 is relative to the omitted pre-regime period in the LPM model, whereas the post-regime 2 indicator is relative to the intercept at the end of post-regime 1 in the ITSA specification.

Figure 3. Effect of Policy Regimes on Aggregate Twelve-Month Registration to HHF Receipt



Source: Authors' tabulation based on Ohio HHF administrative data (OHFA 2015b).

Table 5. Linear Probability Model Results, HHF Registrants

	Full Sample		Receiving Unemployment Insurance		Not Receiving Unemployment Insurance	
	(1) Receipt	(2) Foreclosure	(3) Receipt	(4) Foreclosure	(5) Receipt	(6) Foreclosure
Post-regime 1	0.045*** (0.005)	-0.028*** (0.004)	0.037*** (0.009)	-0.019** (0.006)	0.061*** (0.005)	-0.034*** (0.005)
Post-regime 2	0.091*** (0.007)	-0.050*** (0.005)	0.053*** (0.012)	-0.047*** (0.007)	0.118*** (0.008)	-0.050*** (0.007)
Female	0.030*** (0.004)	-0.025*** (0.004)	0.042*** (0.008)	-0.030*** (0.005)	0.033*** (0.005)	-0.024*** (0.005)
Black	0.029*** (0.005)	0.003 (0.004)	0.068*** (0.010)	0.010 (0.007)	0.020*** (0.006)	-0.002 (0.005)
Hispanic	0.008 (0.013)	0.021 (0.011)	-0.007 (0.023)	0.006 (0.017)	0.019 (0.015)	0.029 (0.015)
Age 41-50	0.041*** (0.005)	-0.007 (0.005)	0.048*** (0.010)	-0.011 (0.007)	0.032*** (0.006)	-0.003 (0.006)
Age 51-60	0.060*** (0.006)	-0.019*** (0.005)	0.080*** (0.010)	-0.020** (0.007)	0.043*** (0.007)	-0.017** (0.007)
Age 61 and older	0.043*** (0.007)	-0.026*** (0.006)	0.087*** (0.015)	-0.033*** (0.009)	0.034*** (0.008)	-0.023** (0.008)
Married	0.034*** (0.005)	-0.047*** (0.004)	0.011 (0.009)	-0.038*** (0.007)	0.039*** (0.006)	-0.051*** (0.005)
AMI 1-50 percent	-0.175*** (0.009)	0.007 (0.006)	-0.161*** (0.014)	0.014 (0.008)	-0.194*** (0.013)	0.004 (0.009)
AMI 51-80 percent	-0.217*** (0.009)	0.013* (0.006)	-0.202*** (0.014)	0.019* (0.009)	-0.224*** (0.012)	0.008 (0.009)
AMI 81-115 percent	-0.261*** (0.010)	-0.003 (0.008)	-0.276*** (0.017)	0.010 (0.011)	-0.254*** (0.014)	-0.011 (0.011)
History of delinquency	-0.016** (0.006)	0.069*** (0.006)	-0.015 (0.011)	0.069*** (0.010)	-0.010 (0.007)	0.067*** (0.007)
Foreclosure at registration	-0.030*** (0.005)	0.139*** (0.006)	-0.048*** (0.011)	0.145*** (0.010)	-0.008 (0.006)	0.133*** (0.007)
Unemployment rate	0.011*** (0.002)	0.000 (0.001)	0.013*** (0.003)	0.000 (0.002)	0.008*** (0.002)	0.000 (0.002)
Controls	Y	Y	Y	Y	Y	Y
Constant	-0.129 (0.140)	0.421*** (0.113)	0.121 (0.252)	0.574*** (0.174)	-0.281 (0.164)	0.337* (0.148)
Mean	0.268	0.151	0.379	0.125	0.201	0.167
Observations	44,110	44,110	16,575	16,575	27,535	27,535
R ²	0.071	0.053	0.062	0.056	0.049	0.050

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Note: Additional control variables include: Age missing, household size, education, hardship, DTI, mortgage amount, bankruptcy, fixed interest rate, prior junior lien, year built, square feet, and acres. Table A.4 displays results for the full set of control variables. Robust standard errors in parentheses.

* $p < .05$; ** $p < .01$; *** $p < .001$

with dummy variables for these subgroups. The results are shown in table A.5. We find a significant interaction between the administrative reforms and being a female in the full sample, where post-regime 1 is associated with a 2.6 percentage point higher probability and post-regime 2 is associated with a 4.0 percentage point higher probability of receiving assistance for women than for men ($p < .01$). We find no differential effects for race and regime or age and regime on the probability of receiving assistance or on the probability of foreclosure.

ALTERNATIVE SPECIFICATIONS

We examine the robustness of our results to several alternative specifications. First, we estimate sensitivity tests for different time periods of pull through from registration to receipt. In our main models, we define HHF recipients as registrants who receive HHF within twelve months of their initial registration—capturing most registrants who go on to receive assistance. Alternatively, we estimate models that predict receiving HHF assistance within three, six, and nine months of the initial registration, as well as ever receiving assistance. The ITSA and LPM results for post-regime 1 on registrant pull-through rates are statistically significant in a negative direction when HHF receipt is defined as three months following registration. In other words, immediately after the administrative reforms, the likelihood of receiving assistance within three months decreased, likely due to capacity limitations. The number of applications submitted to HHF increased by 280 percent, causing institutional congestion and making it less likely that applications received funding quickly. The LPM and ITSA results for the regimes do not differ substantially from our main specification results when defining HHF receipt using the nine-month, or “ever” pull-through rates.

For the ITSA models, we test alternate specifications limiting the window of time to six months before and after each policy regime change, still excluding the two-month window before the beginning of post-regime 1. Overall, the effects of the administrative reforms on HHF application rate, pull-through rate, and foreclosure rate are robust to this restricted sample period.

Finally, we conduct LPM analyses using a sample of only HHF applicants—registrants who submitted a complete application. In this set of models, our dependent variable represents the probability of pull through from application to HHF receipt, and the probability of foreclosure within three years of application. Our primary specification predicts the probability of receiving HHF within six months of application, but we also estimate sensitivity tests for three, nine, and twelve months. As with the full registrant sample, we split the applicant sample into UI applicants and non-UI applicants. We find that post-regime 1 is associated with an increased pull-through rate for the full sample (5.1 percentage points) and non-UI applicants (11.7 percentage points), but the effect is not statistically significant for UI applicants (for the results, see table A.6). Post-regime 1 is associated with a reduction in the foreclosure rate of 4.1, 3.5, and 4.6 percentage points for the full, UI, and non-UI applicant samples ($p < .01$). Post-regime 2 is also significantly associated with an increased pull-through rate of 11.2, 7.2, and 17.3 percentage points ($p < .01$) for the full, UI, and non-UI applicants, respectively. All samples saw a significant decrease in the foreclosure rate ranging from 4.3 to 4.6 percentage points following the introduction of post-regime 2. The applicant model results largely support our main findings.

STUDY LIMITATIONS

Although the Ohio HHF program is an interesting case to examine administrative burden, it is a single program within a single state at a specific time during the Great Recession. It is likely that some of the findings are context dependent—for example, the extent to which internal processes create costs for program applicants likely varies substantially based on the nature of the benefit being provided, the regulations governing its distribution, the needs of the target population, and the capacity of the administering agency. Second, the ITSA's ability to isolate causal effects rests on the assumption that the administrative reforms to reduce application compliance costs are as good as random, and that no other temporal changes corresponded to the reforms that might explain

the observed differences in outcomes. However, we observe some significant differences in registrant characteristics between regimes that may be related to improvements in the macro-economy following the Great Recession (see table A.2). In light of these differences, we estimate LPMs that control for individual registrant characteristics and find substantively similar, if not stronger, results to those from the ITSA model. This increases confidence that our results are due to the changing regimes and not simply differences in registrant characteristics over time. Third, like many other field studies of administrative burden, the administrative reforms analyzed here represent a bundle of mechanisms that may affect application pull through and subsequently program outcomes. Although our study design focuses on active and passive compliance costs, the results suggest the underlying mechanisms rather than a precise test.

DISCUSSION AND CONCLUSIONS

This study advances the literature on administrative burden in several ways. First, we theoretically distinguish compliance costs as active or passive based on the degree of agency required of an individual when confronting a particular step in the application process. We show that this distinction matters for the types of applicants affected by reforms to reduce compliance costs. Specifically, individuals with more complex cases—in this case, without a UI claim who have harder-to-document hardships—were more affected by administrative reforms to reduce compliance cost. Disparate impacts for more complex cases can compound inequities across social programs. For example, research documents racial differences in the take-up of UI benefits, where people who are Black are less likely to apply for and pull through the application process for UI benefits—differences that cannot be fully explained by observable characteristics (Kuka and Stuart 2021). Our research suggests that people who are Black not only disproportionately miss out on UI benefits, but also may slip through other social safety net programs because they subsequently have hardships that are more difficult to document.

Second, our study findings highlight the need to think holistically about the regime of burdens associated with a given policy or program (Moynihan, Gerzina, and Herd 2022), rather than a single burden, such as an application form, in isolation. Although prior studies find that the removal of documentation requirements increases program take-up (Graff and Pirog 2019; Moynihan, Herd, and Ribgy 2016), we find evidence that removing hardship documentation dampened the overall effects of internal process improvements. This offers nuance to the notion of shifting burdens between individuals and the state to think about the intersection of individual and organizational burdens. Well-intended efforts to reduce active compliance costs in the HHF program led to congestion, extending internal processing times and increasing passive compliance costs to applicants. There is a need to consider internal process reforms that reduce congestion and enhance state capacity alongside more direct reforms to reduce applicant compliance costs. This is particularly relevant in times of crisis, when the aim is to distribute benefits as quickly as possible to people in need, and sometimes this intent conflicts with existing administrative processes and red tape designed to reduce fraud (Aiken, Ellen, and Reina 2023, this issue).

Third, our study contributes to the nascent literature on the distributional effects of administrative burden on program outcomes—in this case, the longer-term foreclosure rate among all individuals who started the application process. Standard economic theory on ordeal mechanisms suggests that administrative burdens are an efficient sorting mechanism, under which people most in need of benefits (in this case, who are more likely to foreclose absent intervention) are more likely to persist through an arduous process. Our findings indicate the opposite—that reductions to active and passive compliance costs are associated with improved targeting efficiency, as measured by lower rates of foreclosure among the entire pool of people who begin the application process (registrants)—regardless of whether they complete the application and subsequently receive benefits.

Table A.1. Complete Summary Statistics, HHF Registrant Sample

	Full Sample (1)	Receiving Unemployment Insurance (2)	Not Receiving Unemployment Insurance (3)
Pull-through rates (mean)			
6-month registration to application	0.36	0.46	0.29
12-month registration to assistance	0.27	0.38	0.20
12-month application to assistance	0.72	0.8	0.66
3-year redefault rate (mean)	0.15	0.12	0.17
Processing times (median days)			
Registration to application	63	55	70
Application to assistance	101	97	107
Registration to Assistance	183	168	202
Mortgage characteristics (mean)			
Percent AMI	0.42	0.39	0.45
Debt-to-income ratio	0.41	0.44	0.39
Mortgage amount (\$)	118,410.90	119,231.87	117,918.06
History of delinquency	14.68	12.24	16.15
Self-reported foreclosure notice	17.46	13.41	19.89
Fixed interest rate	83.12	84.63	82.22
Conventional loan	64.07	63.47	64.44
Prior junior lien	8.27	7.75	8.59
Demographic characteristics			
Age (mean)	48.36	47.28	49.01
Female (share)	52.87	45.51	57.31
Race (share)			
White	72.93	77.91	69.93
Black	24.07	19.11	27.06
Other race	3.00	2.98	3.01
Hispanic (share)	2.64	2.54	2.70
Married (share)	47.17	53.32	43.47
Household size (mean)	2.78	2.78	2.77
Education (share)			
Below high school	6.23	5.49	6.68
High school	54.24	54.78	53.91
Two-year college	20.61	19.43	21.33
Bachelor's degree or higher	18.91	20.30	18.07
Self-reported hardship (share)			
Unemployed	37.61	71.36	17.31
Wage loss	35.46	19.09	45.31
Other	26.00	9.22	36.09
Self-reported prior bankruptcy (share)	14.48	13.16	15.28
Property characteristics (mean)			
Year home built	1955.99	1957.02	1955.36
Square feet	1,514.10	1,517.56	1,512.01
Acres	0.70	0.75	0.67
Monthly unemployment rate by county	7.33	7.35	7.31
Policy regime (share)			
Pre-regime	45.12	48.48	43.11
Post-regime 1	39.45	33.85	42.82
Post-regime 2	15.42	17.67	14.07
Observations	44,140	16,581	27,559

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Table A.2. Summary of Sample Composition Differences by Regime

	Full Sample		Receiving Unemployment Insurance		Not Receiving Unemployment Insurance	
	Post-regime 1	Post-regime 2	Post-regime 1	Post-regime 2	Post-regime 1	Post-regime 2
	Female	0.013* (0.005)	-0.004 (0.007)	0.019* (0.009)	-0.005 (0.011)	-0.006 (0.006)
Black	-0.037*** (0.004)	-0.052*** (0.006)	-0.023*** (0.007)	-0.051*** (0.008)	-0.054*** (0.006)	-0.048*** (0.008)
Hispanic	-0.003 (0.002)	-0.002 (0.002)	-0.002 (0.003)	-0.001 (0.003)	-0.004 (0.002)	-0.002 (0.003)
Age	1.701*** (0.119)	3.412*** (0.161)	0.748*** (0.177)	2.737*** (0.219)	2.031*** (0.157)	3.983*** (0.228)
Married	-0.001 (0.005)	0.005 (0.007)	0.006 (0.009)	0.028** (0.011)	0.006 (0.006)	-0.016 (0.009)
Household size	-0.139*** (0.016)	-0.233*** (0.021)	-0.068* (0.026)	-0.144*** (0.032)	-0.134*** (0.020)	-0.299*** (0.028)
Percent area median income	-0.051*** (0.003)	-0.042*** (0.004)	-0.082*** (0.005)	-0.034*** (0.006)	-0.043*** (0.004)	-0.045*** (0.005)
Debt-to-income ratio	0.014* (0.006)	0.086*** (0.010)	0.007 (0.011)	0.070*** (0.015)	0.030*** (0.007)	0.096*** (0.014)
Mortgage amount	1305.822* (613.399)	1306.563 (840.970)	694.123 (1012.412)	2497.979 (1288.521)	1730.672* (771.403)	347.945 (1110.681)
Bankruptcy	-0.129*** (0.004)	-0.149*** (0.004)	-0.107*** (0.006)	-0.127*** (0.006)	-0.145*** (0.005)	-0.164*** (0.006)
History of delinquency	-0.005** (0.004)	-0.018*** (0.005)	-0.003 (0.006)	-0.022** (0.007)	-0.011* (0.005)	-0.014* (0.007)
Foreclosure at registration	-0.119*** (0.004)	-0.152*** (0.005)	-0.091*** (0.006)	-0.127*** (0.006)	-0.144*** (0.005)	-0.166*** (0.007)
Unemployment rate	-0.286*** (0.012)	-1.348*** (0.017)	-0.338*** (0.021)	-1.546*** (0.027)	-0.242*** (0.015)	-1.205*** (0.022)
Observations	17,414	6,808	5,613	2,930	11,801	3,878

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Robust standard errors in parentheses.

* $p < .05$; ** $p < .01$; *** $p < .001$

Table A.3. Interrupted Time Series Results, 6-Month HHF Application Rate

Variables	Full Sample (1)	Receiving Unemployment Insurance (2)	Not Receiving Unemployment Insurance (3)
Time	0.005*** (0.001)	0.008*** (0.002)	0.006*** (0.001)
Post-regime 1	0.034* (0.013)	0.026 (0.027)	0.041*** (0.009)
Post-regime 1 x time	-0.011*** (0.001)	-0.017*** (0.003)	-0.010*** (0.001)
Post-regime 2	0.079*** (0.013)	0.084** (0.028)	0.069*** (0.011)
Post-regime 2 x time	0.024*** (0.005)	0.013 (0.008)	0.026*** (0.006)
Constant	0.281*** (0.005)	0.374*** (0.013)	0.200*** (0.005)
Mean	0.349	0.459	0.283
Observations	30	30	30

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

* $p < .05$; ** $p < .01$; *** $p < .001$

Table A.4. Linear Probability Model Results, HHF Registrants

	Full Sample		Receiving Unemployment Insurance		Not Receiving Unemployment Insurance	
	(1) Receipt	(2) Foreclosure	(3) Receipt	(4) Foreclosure	(5) Receipt	(6) Foreclosure
Post-regime 1	0.045*** (0.005)	-0.028*** (0.004)	0.037*** (0.009)	-0.019** (0.006)	0.061*** (0.005)	-0.034*** (0.005)
Post-regime 2	0.091*** (0.007)	-0.050*** (0.005)	0.053*** (0.012)	-0.047*** (0.007)	0.118*** (0.008)	-0.050*** (0.007)
Female	0.030*** (0.004)	-0.025*** (0.004)	0.042*** (0.008)	-0.030*** (0.005)	0.033*** (0.005)	-0.024*** (0.005)
Black	0.029*** (0.005)	0.003 (0.004)	0.068*** (0.010)	0.010 (0.007)	0.020*** (0.006)	-0.002 (0.005)
Hispanic	0.008 (0.013)	0.021 (0.011)	-0.007 (0.023)	0.006 (0.017)	0.019 (0.015)	0.029 (0.015)
Age 41-50	0.041*** (0.005)	-0.007 (0.005)	0.048*** (0.010)	-0.011 (0.007)	0.032*** (0.006)	-0.003 (0.006)
Age 51-60	0.060*** (0.006)	-0.019*** (0.005)	0.080*** (0.010)	-0.020** (0.007)	0.043*** (0.007)	-0.017** (0.007)
Age 61 and older	0.043*** (0.007)	-0.026*** (0.006)	0.087*** (0.015)	-0.033*** (0.009)	0.034*** (0.008)	-0.023** (0.008)
Age missing	-0.057* (0.026)	0.017 (0.032)			-0.040 (0.025)	0.014 (0.032)
Married	0.034*** (0.005)	-0.047*** (0.004)	0.011 (0.009)	-0.038*** (0.007)	0.039*** (0.006)	-0.051*** (0.005)
Household size	-0.003 (0.002)	0.006*** (0.001)	0.002 (0.003)	0.002 (0.002)	-0.003 (0.002)	0.008*** (0.002)
High school	0.001 (0.009)	-0.018* (0.007)	-0.006 (0.017)	-0.012 (0.012)	0.000 (0.010)	-0.020* (0.009)
Two-year degree	-0.009 (0.010)	-0.023** (0.008)	-0.015 (0.018)	-0.023 (0.013)	-0.008 (0.011)	-0.022** (0.010)
Four-year degree or higher	-0.012 (0.010)	-0.037*** (0.008)	-0.023 (0.018)	-0.038** (0.013)	-0.014 (0.011)	-0.035*** (0.010)
Education missing	0.811*** (0.021)	-0.114*** (0.031)			0.832*** (0.017)	-0.114** (0.037)
AMI 1-50 percent	-0.175*** (0.009)	0.007 (0.006)	-0.161*** (0.014)	0.014 (0.008)	-0.194*** (0.013)	0.004 (0.009)
AMI 51-80 percent	-0.217*** (0.009)	0.013* (0.006)	-0.202*** (0.014)	0.019* (0.009)	-0.224*** (0.012)	0.008 (0.009)
AMI 81-115 percent	-0.261*** (0.010)	-0.003 (0.008)	-0.276*** (0.017)	0.010 (0.011)	-0.254*** (0.014)	-0.011 (0.011)
Hardship wage loss	-0.140*** (0.005)	0.020*** (0.004)	-0.116*** (0.009)	0.017* (0.007)	-0.031*** (0.007)	-0.005 (0.006)
Hardship other	-0.121*** (0.006)	0.022*** (0.004)	-0.139*** (0.012)	0.032** (0.010)	0.002 (0.008)	-0.007 (0.007)
Hardship missing	-0.299*** (0.005)	0.018 (0.019)	-0.334*** (0.013)	0.045 (0.055)	-0.172*** (0.007)	-0.013 (0.021)
Debt-to-income ratio	0.013** (0.004)	0.005 (0.003)	0.013 (0.007)	0.000 (0.004)	0.013** (0.005)	0.008* (0.004)

Table A.4. (continued)

	Full Sample		Receiving Unemployment Insurance		Not Receiving Unemployment Insurance	
	(1) Receipt	(2) Foreclosure	(3) Receipt	(4) Foreclosure	(5) Receipt	(6) Foreclosure
Mortgage amount	0.000 (0.000)	0.000*** (0.000)	0.000 (0.000)	0.000*** (0.000)	0.000* (0.000)	0.000* (0.000)
Mortgage amount missing	0.025 (0.013)	-0.060*** (0.008)	0.048* (0.023)	-0.016 (0.013)	0.006 (0.015)	-0.087*** (0.010)
Bankruptcy	-0.014* (0.006)	0.009 (0.005)	-0.031** (0.011)	0.017* (0.008)	-0.002 (0.006)	0.004 (0.007)
History of delinquency	-0.016** (0.006)	0.069*** (0.006)	-0.015 (0.011)	0.069*** (0.010)	-0.010 (0.007)	0.067*** (0.007)
Foreclosure at registration	-0.030*** (0.005)	0.139*** (0.006)	-0.048*** (0.011)	0.145*** (0.010)	-0.008 (0.006)	0.133*** (0.007)
Fixed interest rate	0.014** (0.005)	0.004 (0.004)	0.023* (0.010)	-0.006 (0.007)	0.005 (0.006)	0.011 (0.006)
Conventional loan	-0.006 (0.004)	-0.032*** (0.004)	-0.025** (0.008)	-0.029*** (0.006)	0.007 (0.005)	-0.034*** (0.005)
Prior junior lien	-0.031*** (0.008)	0.009 (0.006)	-0.027 (0.014)	0.019* (0.010)	-0.032*** (0.009)	0.005 (0.008)
Year home built	0.000*** (0.000)	0.000* (0.000)	0.000 (0.000)	0.000* (0.000)	0.000*** (0.000)	0.000 (0.000)
Year built missing	0.494*** (0.141)	-0.229* (0.114)	0.276 (0.254)	-0.406* (0.177)	0.532** (0.165)	-0.106 (0.149)
Square footage	0.000 (0.000)	0.000 (0.000)	0.000 (0.000)	0.000 (0.000)	0.000 (0.000)	0.000 (0.000)
Square footage missing	-0.026 (0.024)	-0.016 (0.020)	-0.010 (0.045)	-0.019 (0.031)	-0.019 (0.026)	-0.018 (0.027)
Acres	0.000 (0.001)	-0.002*** (0.000)	-0.002 (0.001)	-0.001* (0.001)	0.001 (0.001)	-0.002*** (0.001)
Acres missing	0.032 (0.029)	0.014 (0.022)	0.024 (0.045)	0.065 (0.033)	0.032 (0.035)	-0.024 (0.028)
Unemployment rate	0.011*** (0.002)	0.000 (0.001)	0.013*** (0.003)	0.000 (0.002)	0.008*** (0.002)	0.000 (0.002)
Constant	-0.129 (0.140)	0.421*** (0.113)	0.121 (0.252)	0.574*** (0.174)	-0.281 (0.164)	0.337* (0.148)
Mean	0.268	0.151	0.379	0.125	0.201	0.167
Observations	44,110	44,110	16,575	16,575	27,535	27,535
R ²	0.071	0.053	0.062	0.056	0.049	0.050

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Robust standard errors in parentheses.

* $p < .05$; ** $p < .01$; *** $p < .001$

Table A.5. Interaction Effects of Policy Regime on Registrants by Gender, Race, and Age

Variables	(1) Receipt	(2) Foreclosure
Post-regime 1	0.031*** (0.009)	-0.033*** (0.008)
Post-regime 2	0.059*** (0.015)	-0.056*** (0.011)
Female	0.014* (0.006)	-0.026*** (0.006)
Black	0.021** (0.007)	0.011 (0.006)
Age 41-50	0.041*** (0.007)	-0.011 (0.007)
Age 51-60	0.061*** (0.008)	-0.023** (0.007)
Age 61 and Older	0.049*** (0.011)	-0.037*** (0.009)
Post-regime 1 x female	0.026** (0.009)	0.002 (0.008)
Post-regime 2 x female	0.040** (0.013)	0.003 (0.009)
Post-regime 1 x Black	0.016 (0.011)	-0.014 (0.009)
Post-regime 2 x Black	0.016 (0.016)	-0.016 (0.011)
Post-regime 1 x age 41-50	0.002 (0.011)	0.007 (0.010)
Post-regime 1 x age 51-60	-0.003 (0.012)	0.007 (0.010)
Post-regime 1 x age 61 and older	-0.026 (0.015)	0.024 (0.012)
Post-regime 2 x age 41-50	0.002 (0.017)	0.014 (0.013)
Post-regime 2 x age 51-60	0.004 (0.017)	0.010 (0.013)
Post-regime 2 x age 61 and older	0.025 (0.020)	0.011 (0.014)
Control variables	Y	Y
Constant	-0.116 (0.140)	0.424*** (0.113)
Mean	0.268	0.151
Observations	44,110	44,110
R ²	0.072	0.053

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Note: Control variables are the same as those shown in table A.4 and include Hispanic, married, household size, education, AMI, hardship, DTI, mortgage amount, bankruptcy, history of delinquency, foreclosure at registration, fixed interest rate, prior junior lien, year built, square feet, acres, and monthly unemployment rate by county. Robust standard errors in parentheses.

* $p < .05$; ** $p < .01$; *** $p < .001$

Table A.6. Linear Probability Model Results, HHF Applicants

	Full Sample		Receiving Unemployment Insurance		Not Receiving Unemployment Insurance	
	(1)	(2)	(3)	(4)	(5)	(6)
	Receipt	Foreclosure	Receipt	Foreclosure	Receipt	Foreclosure
Post-regime 1	0.051*** (0.008)	-0.041*** (0.005)	0.001 (0.011)	-0.035*** (0.007)	0.117*** (0.012)	-0.048*** (0.008)
Post-regime 2	0.112*** (0.009)	-0.043*** (0.006)	0.072*** (0.012)	-0.043*** (0.008)	0.173*** (0.013)	-0.046*** (0.009)
Female	0.016* (0.007)	-0.011* (0.005)	0.013 (0.009)	-0.013* (0.006)	0.027** (0.010)	-0.010 (0.007)
Black	-0.068*** (0.008)	0.013* (0.005)	-0.043*** (0.011)	0.019** (0.007)	-0.078*** (0.011)	0.006 (0.007)
Hispanic	-0.037 (0.021)	0.027 (0.014)	-0.029 (0.028)	0.009 (0.019)	-0.038 (0.030)	0.041 (0.021)
Age 41–50	0.001 (0.009)	-0.017** (0.006)	0.006 (0.012)	-0.019* (0.008)	-0.006 (0.014)	-0.016 (0.010)
Age 51–60	-0.013 (0.009)	-0.023*** (0.006)	0.002 (0.012)	-0.028*** (0.008)	-0.031* (0.014)	-0.017 (0.010)
Age 61 and older	-0.018 (0.012)	-0.035*** (0.008)	0.018 (0.017)	-0.049*** (0.010)	-0.038* (0.017)	-0.025* (0.011)
Age missing	-0.115 (0.078)	-0.077 (0.042)			-0.102 (0.076)	-0.078 (0.042)
Married	0.011 (0.008)	-0.022*** (0.005)	-0.010 (0.011)	-0.019* (0.007)	0.017 (0.011)	-0.024** (0.008)
Household size	0.003 (0.003)	0.000 (0.002)	0.008* (0.004)	-0.001 (0.002)	-0.001 (0.004)	0.001 (0.003)
High school	0.017 (0.014)	-0.018* (0.009)	0.011 (0.019)	-0.025 (0.014)	0.019 (0.019)	-0.013 (0.013)
Two-year degree	0.001 (0.015)	-0.026** (0.010)	-0.005 (0.021)	-0.038** (0.015)	0.004 (0.021)	-0.015 (0.014)
Four-year degree or higher	0.007 (0.015)	-0.027** (0.010)	-0.002 (0.021)	-0.040** (0.015)	0.008 (0.022)	-0.014 (0.014)
Education missing	0.205 (0.226)	-0.139*** (0.026)	0.374*** (0.030)	-0.223*** (0.021)	0.174 (0.275)	-0.107*** (0.016)
AMI 1%–50%	-0.022 (0.011)	0.005 (0.007)	-0.025 (0.015)	0.013 (0.008)	-0.034 (0.018)	-0.003 (0.010)
AMI 51%–80%	-0.048*** (0.012)	0.028*** (0.007)	-0.035* (0.016)	0.025** (0.009)	-0.061*** (0.018)	0.029** (0.011)
AMI 81%–115%	-0.091*** (0.015)	0.036*** (0.010)	-0.080*** (0.021)	0.026 (0.013)	-0.097*** (0.022)	0.041** (0.015)
Hardship wage loss	-0.138*** (0.008)	0.017*** (0.005)	-0.075*** (0.013)	0.005 (0.008)	-0.093*** (0.013)	0.009 (0.009)
Hardship other	-0.129*** (0.009)	0.020*** (0.006)	-0.121*** (0.018)	0.025* (0.012)	-0.060*** (0.013)	0.006 (0.009)
Hardship missing	-0.315 (0.192)	-0.148*** (0.036)	-0.737*** (0.022)	-0.002 (0.013)	-0.164 (0.218)	-0.190*** (0.039)
Debt-to-income ratio	0.009 (0.006)	-0.001 (0.003)	0.018** (0.007)	-0.005 (0.004)	0.002 (0.008)	0.002 (0.005)

(continued)

Table A.6. (continued)

	Full Sample		Receiving Unemployment Insurance		Not Receiving Unemployment Insurance	
	(1) Receipt	(2) Foreclosure	(3) Receipt	(4) Foreclosure	(5) Receipt	(6) Foreclosure
Mortgage amount	-0.000 (0.000)	0.000** (0.000)	-0.000 (0.000)	0.000** (0.000)	-0.000 (0.000)	0.000 (0.000)
Mortgage amount missing	-0.014 (0.019)	0.000 (0.011)	-0.004 (0.026)	0.030 (0.017)	-0.031 (0.028)	-0.026 (0.015)
Bankruptcy	-0.013 (0.009)	-0.003 (0.006)	-0.035** (0.013)	-0.003 (0.009)	0.008 (0.013)	-0.004 (0.009)
History of delinquency	-0.038*** (0.009)	0.081*** (0.007)	-0.037** (0.013)	0.074*** (0.011)	-0.031* (0.012)	0.085*** (0.010)
Foreclosure at registration	-0.039*** (0.009)	0.074*** (0.007)	-0.044** (0.014)	0.079*** (0.012)	-0.021 (0.012)	0.068*** (0.009)
Fixed interest rate	0.028** (0.009)	-0.001 (0.006)	0.032* (0.013)	-0.020* (0.008)	0.022 (0.012)	0.015 (0.008)
Conventional loan	-0.032*** (0.007)	-0.031*** (0.005)	-0.043*** (0.009)	-0.028*** (0.006)	-0.017 (0.010)	-0.034*** (0.007)
Prior junior lien	-0.051*** (0.013)	0.007 (0.008)	-0.060** (0.019)	0.015 (0.011)	-0.044* (0.018)	0.000 (0.011)
Year home built	0.000 (0.000)	-0.000 (0.000)	0.000 (0.000)	-0.000 (0.000)	0.000 (0.000)	-0.000 (0.000)
Year built missing	0.367 (0.227)	-0.148 (0.143)	0.371 (0.317)	-0.236 (0.202)	0.387 (0.323)	-0.081 (0.203)
Square footage	-0.000 (0.000)	-0.000** (0.000)	0.000 (0.000)	-0.000 (0.000)	-0.000 (0.000)	-0.000** (0.000)
Square footage missing	-0.029 (0.040)	0.007 (0.022)	-0.071 (0.052)	-0.003 (0.030)	0.042 (0.060)	0.016 (0.031)
Acres	-0.002 (0.001)	-0.001 (0.000)	-0.006*** (0.002)	-0.001 (0.001)	0.001 (0.001)	-0.001 (0.001)
Acres missing	0.034 (0.039)	0.042 (0.029)	0.031 (0.049)	0.042 (0.036)	0.025 (0.060)	0.043 (0.046)
Unemployment rate	0.004 (0.002)	0.002 (0.002)	-0.001 (0.003)	0.001 (0.002)	0.006 (0.004)	0.003 (0.002)
Constant	0.332 (0.225)	0.252 (0.142)	0.439 (0.313)	0.369 (0.200)	0.129 (0.320)	0.170 (0.203)
Mean	0.645	0.108	0.721	0.094	0.572	0.121
Observations	21,161	21,161	10,445	10,445	10,716	10,716
R ²	0.047	0.043	0.031	0.042	0.040	0.045

Source: Authors' tabulation based on OHFA administrative data (OHFA 2015b), CoreLogic property records (CoreLogic 2018).

Robust standard errors in parentheses.

* $p < .05$; ** $p < .01$; *** $p < .001$

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“When Someone Cares About You, It’s Priceless”: Reducing Administrative Burdens and Boosting Housing Search Confidence to Increase Opportunity Moves for Voucher Holders



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Using in-depth interview data from families and service providers, we examine the success of the Creating Moves to Opportunity (CMTO) program in Seattle, focusing on how it reduced many of the learning, compliance, and psychological costs of using housing vouchers so that participants could expand their residential choices. CMTO's approach of combining information and flexible financial resources with personalized high-quality assistance bolstered participants' confidence, agency, and optimism for their housing searches in high-opportunity neighborhoods. Accessible, collaborative, pertinent communication from program staff was central to addressing both the psychological costs of the federal Housing Choice Voucher program and families' experiences in housing and social services. These results provide evidence to inform housing policy as well as to enrich broader scholarship on program take-up, implementation research, and the role of Navigators and service quality in addressing administrative burdens low-income families face while using other social programs.

Keywords: housing policy, housing vouchers, neighborhoods, administrative burdens

The Housing Choice Voucher (HCV) program is the nation's largest housing assistance program, subsidizing 2.3 million low-income, mostly non-White households, about twice the number housed by "hard unit" public housing (Center on Budget and Policy Priorities 2021a, 2021b; Rosen 2020). Unlike traditional public housing projects, tenant-based housing subsidies are not tied to developments typically located in high-poverty neighborhoods. Thus, in theory, vouchers have the potential to reduce neighborhood inequality by providing low-income renters more geographic choice and greater access to higher opportunity neighborhoods.¹ However, in practice, voucher holders—especially minority households—rarely move out of high-poverty neighborhoods and are little more likely to enter low-poverty communities than poor unassisted renters (Devine et al. 2003; McClure 2008; Pendall 2000; Owens 2012; Collinson and Ganong 2018). The HCV program represents a lost opportunity to counter longstanding racial segregation and rising residential income segregation (Reardon et al. 2018) and to increase upward mobility given the growing evidence that neighborhoods shape children's long-term prospects (Chetty, Hendren, and Katz 2016; Chyn and Katz 2021; Sharkey and Elwert 2011). Recent proposals to expand housing vouchers reinforce the need to better understand how to improve the HCV program.

For housing vouchers to expand neighborhood access, several processes must align.

First, resource-limited public housing authorities (PHAs) need to administer the program in ways that support residential choice. Second, private-market landlords in higher opportunity areas need to accept tenants with vouchers. Third, low-income tenants need to navigate the rental housing market to secure housing and maximize neighborhood and unit quality. Throughout these processes, significant administrative burdens diminish the HCV program's ability to increase housing choice and access to high-opportunity neighborhoods.

This article describes how an innovative housing mobility intervention in the Seattle, King County metro area of Washington State—the Creating Moves to Opportunity (CMTO) program—deployed expert Navigator staff alongside conventional PHA operations to reduce many administrative burdens created by the HCV program, especially burdens that hamper lease-ups in high-opportunity neighborhoods. These burdens include compliance costs associated with paperwork and eligibility requirements, the learning costs related to the time and effort spent searching for housing in the private housing market, as well as major psychological costs, such as fear of failure, loss of autonomy, stigma, and stress. In particular, we find that such psychological costs substantially impede voucher success and housing mobility but have received less attention in the literature (Herd and Moynihan 2018).

By easing administrative costs and psycho-

1. Since the 1970s, U.S. public housing has become increasingly privatized as the Department of Housing and Urban Development (HUD) demolished thousands of "hard" rental units in public housing projects and effectively replaced them with housing vouchers that can be used in the private rental housing market (Schwartz 2013).

logical burdens, the CMTO program increased neighborhood quality for participants. A randomized evaluation of CMTO finds that treatment group families offered CMTO services were significantly more likely to move to high-opportunity areas than control group families: 53 percent of CMTO treatment group families leased up in opportunity areas, relative to 15 percent of control group families, and treatment group families reported higher levels of neighborhood satisfaction (Bergman et al. 2023).² The CMTO treatment effects were similarly large for all race and ethnic subgroups of the diverse group of participants—49 percent Black, 24 percent White, 7 percent Hispanic, and 7 percent Asian—35 percent of whom were born outside the United States.

Using in-depth interviews with families supplemented by survey data, staff interviews and ethnographic observations, we extend and enrich the mixed methods experimental analysis of Peter Bergman and his colleagues (2023) showing how CMTO improved housing mobility. Our analysis focuses on the role of CMTO in reducing administrative burdens and in particular the psychological costs of searching and leasing in high-opportunity areas. By relying on families’ experiences and perspectives on the program, we could identify the “secret sauce” of the CMTO program, and how it reduced psychological costs through staff who provided high-quality communication—alongside financial resources and information—to participants with experiences of trauma, instability, failed housing searches, and sometimes negative social service interactions. Housing mobility staff, referred to as Navigators, incorporated customized, inclusive, responsive, and caring communication into a housing search service model that participants found to be useful and relevant. Navigators increased participants’ trust in the CMTO services, reduced fear of failure during housing searches, and bolstered

participants’ confidence and self-efficacy when conducting more difficult and uncertain searches in high-opportunity areas. Notably, CMTO services were voluntary and vouchers were not restricted to high-opportunity neighborhoods—at any point treatment group families could decide to search in and move to a non-opportunity area.

High-quality communication and service delivery changed how participants experienced the housing search process and supported their efforts toward searching in opportunity areas—neighborhoods many reported being interested in at program enrollment. The services made the difference between families leasing anywhere versus in high-opportunity neighborhoods. Supported by Navigators, families overcame the heightened burdens of using the voucher in high-opportunity areas: participants were more confident, more amenable to longer housing searches, and grew to expect more from their housing searches.

The information and financial resources provided by the CMTO intervention were not enough on their own to substantially increase moves to higher opportunity areas.³ CMTO helped families lease in higher opportunity neighborhoods not only because Navigators alleviated some of the bureaucratic hassles, but also because they communicated with families in emotionally supportive, useful and collaborative ways, allowing them to provide families with tools to use during difficult and discouraging housing searches.

Our findings contribute to several areas of research. First, we add to the growing literature on housing vouchers (Collinson, Ellen, and Ludwig 2016; Rosen 2020), by showing how administrative burdens—especially psychological costs—can contribute to the HCV program falling short of supporting real residential choice and opportunity moves, and how we can improve implementation to increase participants’

2. At 53 percent, the rate of opportunity moves among the treatment group in CMTO was more than four times the historic norm (11 percent) for voucher holders in this metropolitan area. High-opportunity areas are neighborhoods predicted to produce improved long-term educational and economic outcomes for children (Chetty et al. 2018).

3. The CMTO phase 2 experimental results provide additional compelling evidence of the independent and vital role of the Navigators and their personalized approach as opposed to pure information and financial assistance interventions (Bergman et al. 2023).

likelihood of moving to their preferred neighborhood options. Second, we expand the economics and policy evaluation literature on program take-up by going beyond the typical approach of defining take-up as a dichotomous (0–1) outcome (Finkelstein and Notowidigdo 2019). We suggest the importance of measuring program take-up more broadly in some settings—such as housing vouchers, school choice, child care subsidies—for two reasons. One is to capture intermediate supportive social processes. The other is to examine the “quality” of take-up—such as using a housing voucher to move to high-opportunity neighborhoods rather than just lease or not, using a childcare subsidy to get high-quality childcare as opposed to any formal childcare, using financial aid at a high-quality postsecondary program as opposed to a for-profit school with low returns.

Third, we extend the policy implementation literature by looking beyond conventional metrics like intervention timing and dosage (dollars of services used, total service hours) and technical definitions of fidelity to also consider the quality of the personal interactions that accompany services. This contribution reflects broader calls to connect traditional implementation science to human services and social policy research (Bunger and Lengnick-Hall 2019), and complements social work and social welfare literature that pushes for better evidence on service quality as a key condition for impact (McMillen et al. 2005). Finally, we add to the literature on administrative burdens by examining psychological costs in the housing voucher program, and specifically considering how important participant fear of failure and of rejection (such as for housing and job search) is to policy outcomes, and how to reduce this fear and increase confidence and persistence through supportive communication and collaborative implementation.

We believe CMTO offers lessons for reducing administrative burdens in other domains, including education and workforce training,

where it is also important for participants to not only receive support, but for those services to be provided well for the policies to have maximum benefit. A prime example is the evidence from multiple randomized field experiments of the greater efficacy and much larger earnings gains from sectoral employment training programs (such as Year Up and Per Scholas) that combine occupational and “soft skills” training with customized wraparound services, connections to employers, and post-placement services as compared to traditional job training and employment programs (Katz et al. 2022). These results from CMTO and other programs with similar service orientations point to the importance of investing in high-quality services to effectively scale public investments and maximize impact.

DATA AND METHODS

The Creating Moves to Opportunity program is a housing mobility intervention created by the Seattle and King County Housing Authorities (SHA and KCHA) to reduce barriers that HCV recipients face in moving to high-opportunity areas. The intervention was launched in partnership with our research team and designed as a mixed methods randomized controlled trial. Informed by prior housing mobility programs—especially the Baltimore Housing Mobility Program—and local stakeholder input, CMTO provided resources designed to address housing barriers in high-opportunity areas: customized housing search support, landlord engagement, and financial assistance (on prior housing mobility programs, see Rubinowitz and Rosenbaum 2000; Boyd et al. 2010; Briggs, Popkin, and Goering 2010; DeLuca and Rosenblatt 2017). These services were limited to housing searches in opportunity areas and layered into existing HCV operations for newly admitted families, capitalizing on the period preceding voucher issuance and housing search (see figure 1).⁴

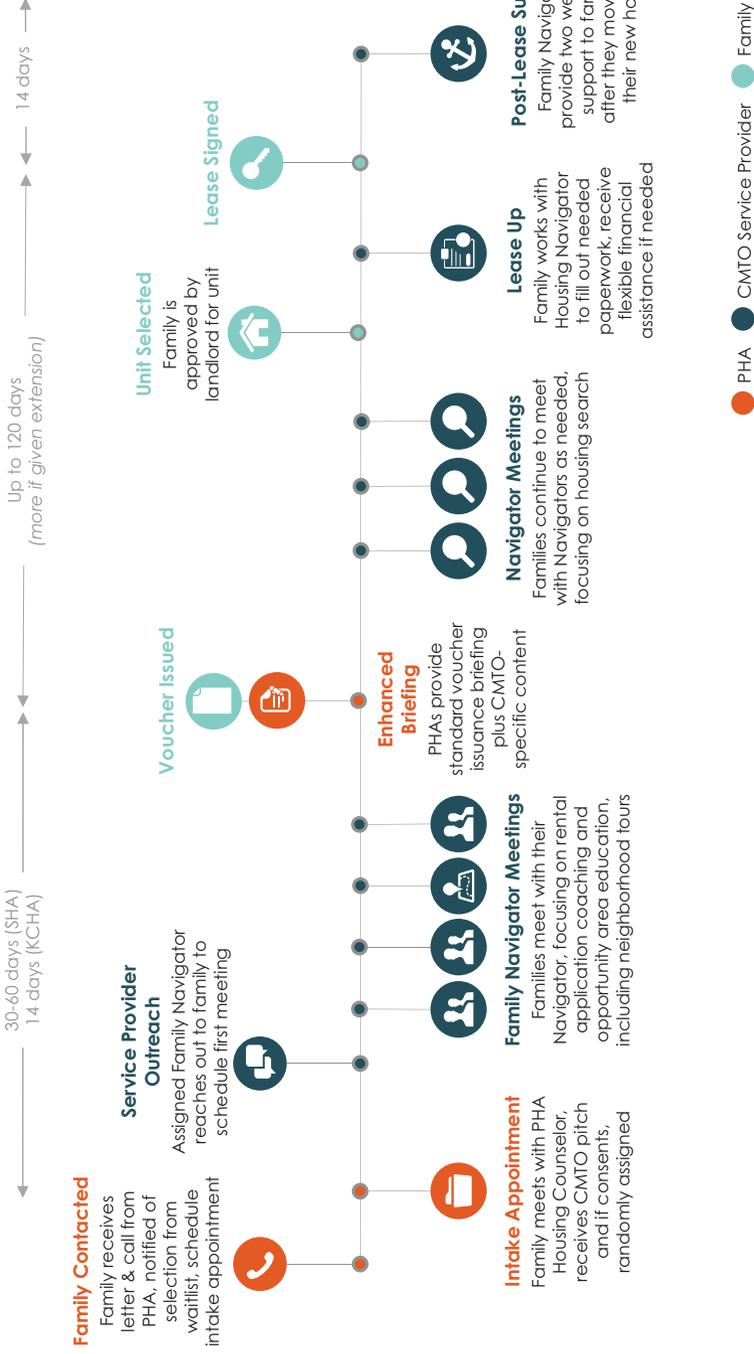
Housing search assistance services for CMTO treatment families were offered by a lo-

4. Opportunity areas were based on the Opportunity Atlas (Chetty et al. 2018) modified slightly in partnership with the PHAs (Bergman et al. 2023). Unlike other mobility programs, which require families to use their vouchers at least initially in opportunity areas, families in CMTO could use their vouchers in any neighborhood within their housing authority’s jurisdiction.

Figure 1. The Creating Moves to Opportunity Intervention Process

Overview of CMTO Family Experience

Because of variations in the voucher issuance timeline at each Public Housing Authority (PHA), the extent to which services were provided pre vs. post issuance varied by PHA.



CMTO SEATTLE/KING COUNTY PROGRAM OVERVIEW

Source: CMTO Program Process, written by the Seattle and King County Housing Authorities. Adapted with permission.

cal nonprofit group, which provided Navigators who contacted families via in-person meetings, phone calls, and text messages. The services included information about high-opportunity areas and the benefits of moving to such areas for families with young children; help in making rental applications more competitive by preparing rental documents and identifying and addressing issues in families' credit and rental histories; and search assistance to help families identify available units, connect with landlords in opportunity areas, and complete the application process.⁵ CMTO staff spent an average of six hours per family. Services were tailored to address the specific issues each family faced: for some families, search assistance focused extensively on application preparation and issues such as credit history; for others, Navigators spent much more time on the search process itself (for more, see Bigelow 2021).

CMTO Navigators also engaged directly with landlords in high-opportunity areas by explaining the new program, encouraging them to lease units to CMTO families, and offering a damage mitigation (insurance) fund. Through these interactions, Navigators were able to identify listings from landlords who indicated that they would be willing to rent their units to voucher holders who met certain criteria. Navigators then helped expedite the lease-up process for landlords through quick turnaround property inspections and streamlined paperwork, serving as a liaison between families, landlords, and housing authorities.

Finally, CMTO families were provided with short-term financial assistance to facilitate the rental process, including funds for application screening fees, security deposits, and other expenses that could stand in the way of securing a lease. These payments were timely and customized to address the specific impediments a family faced. Families in the treatment group received \$1,043 in such assistance on average.

DATA

We rely on survey data collected from CMTO participants at baseline, interview data with

participants at different points of the housing search process, interviews with program staff, and ethnographic observations of program activities like group CMTO voucher briefings and individual meetings with Navigator staff. A total of 497 families consented to participate in the experiment, of whom 430 met the voucher eligibility requirements. Five families used their voucher to move out of the Seattle–King County area, leaving 425 families in the final experimental sample. The baseline participant survey data was collected at study enrollment prior to random assignment.

We conducted in-depth narrative interviews with a random-stratified sample of 161 CMTO study families; 67 percent of the treatment group and 25 percent of the control group families were targeted. We stratified the sample by PHA (SHA or KCHA), treatment status (treatment or control), and lease status (leased up or still searching). We overweighted families in the treatment group and those still searching for housing to learn about the mechanisms through which the treatment works during the search process. We interviewed 161 families in total out of 202 who were targeted for inclusion in the qualitative study, an 80 percent response rate. Table A.1 shows the qualitative sampling strata and response rates. Of 161 families, 130 had leased up by the interview. Among the families interviewed, 119 were in the treatment group and forty-two were in the control group; seventy-four of the treatment group families had moved to opportunity areas.

Table 1 shows baseline summary statistics on the full CMTO experimental sample, the CMTO qualitative sample, and the other CMTO participants. The CMTO families are quite economically disadvantaged (with a mean household annual income of \$20,000 for the CMTO participants in a metro area with a median income of around \$100,000). The vast majority of the CMTO household heads (82 percent) are female, and about half (49 percent) are Black (non-Hispanic), 24 percent non-Hispanic White, 8 percent Hispanic, and 7 percent Asian. Most (72 percent) expressed interest in moving

5. For intervention services in languages other than English, families could select the translation option they felt most comfortable with: translation through a neighbor, friend, or family member; a third-party in-person language interpretation service; or a third-party phone interpretation service.

to higher opportunity areas, but were pessimistic about their prospects of making such moves. At baseline, CMTO families were living in relatively disadvantaged neighborhoods within King County. There are no meaningful differences between the full CMTO experimental sample and our qualitative subsample.

Most interview respondents were recruited through phone calls, although some responded to recruitment letters sent by mail and email.⁶ Once we made contact, most people (91 percent) agreed to an interview immediately or agreed to schedule one at a more convenient time. Our sample included some families with limited English proficiency, reflecting the diversity of program participants. To address language barriers, families chose one of three translation options to complete an interview, whichever they felt most comfortable with: a neighbor, friend, or family member; a third-party in-person language interpretation service; or a third-party phone interpretation service. Interviews were conducted in respondents’ homes, or at other locations they chose, such as local libraries or McDonald’s restaurants.

The semi-structured interviews took from one to four hours, with most lasting about two hours. Respondents were asked about their personal life, residential history, children’s schools, employment and education history, health, experiences working with the PHAs and (if in the treatment group) the CMTO program. All interviews were recorded and transcribed. Respondents were paid \$50 for their time.

Interviewing Methods

We used a semi-structured approach to interviewing, first asking open-ended questions to allow a wide range of responses to emerge, and then targeted follow-up questions to ensure that all interviews covered the same material (for more, see DeLuca, Clampet-Lundquist, and Edin 2016; Boyd and DeLuca

2017). These interviews created a natural, in-depth conversation rather than a series of clinical questions and short answers, facilitating more detailed stories and the emergence of themes unanticipated by the researchers—in sharp contrast to forced choice response survey questions.

We started our interviews with a broad invitation: “Tell me the story of your life.” Immediately, this communicated that we were interested in the whole story of who people are. Rather than merely documenting events in our research participants’ lives, this approach provided an opportunity for respondents to reveal how they see things, what they feel is important, how they make decisions, how they have made sense of their past and imagine their future. Respondents then answered in their own words without worrying about giving a wrong answer or saying too much. Importantly, it also created an experience where families could feel like the experts, and the research team was seen as students.

Although we focus here primarily on information obtained directly from our family interviews, our fieldwork also included other elements of observation that inform our interpretation of the data. Every time we interviewed families, we spent hours in their homes, talking to other household members and friends as they came and went, playing with children, meeting neighbors, and watching neighborhood activities. Researchers digitally recorded initial impressions of the interviews and such ethnographic observations immediately after the interviews occurred, and wrote fieldnotes for each interview. Fieldnotes described everything that happened during an interview visit, including the setting (usually the housing unit and surrounding neighborhood blocks), what participants were like (such as attire and demeanor), interactions with other family members, any other information that was not recorded (warm-up and exiting conver-

6. In all, thirty people helped conduct interviews. All but two interviewers were female, and the racial-ethnic breakdown was 68 percent White, 20 percent Asian, and 12 percent Hispanic. The primary qualitative research team included DeLuca, five graduate students, and nine undergraduate students from Johns Hopkins University. Many of the students had previous qualitative research experience, and several had experience working on housing mobility programs. Seven staff from a local research firm, MEF Associates, along with eight graduate students from the University of Washington were also hired to help with data collection onsite.

Table 1. Summary Statistics for Households in Qualitative Sample Versus Full Sample

	Full Sample		Quantitative Sample		Not in Qualitative Sample		P-Value of Qualitative vs. Nonqualitative Difference (7)
	Mean (1)	N (2)	Mean (3)	N (4)	Mean (5)	N (6)	
A. Head of household demographics							
Age	34.20	425	34.24	161	34.17	264	0.993
Annual household income (\$)	20,009	424	20,298	161	19,833	263	0.588
% Speak English (without translator)	81.41	425	83.85	161	79.92	264	0.271
% Born outside the United States	35.14	424	34.78	161	35.36	263	0.823
% Black non-Hispanic	49.05	422	52.80	161	46.74	261	0.302
% White non-Hispanic	24.41	422	21.74	161	26.05	261	0.344
% Hispanic	8.29	422	8.07	161	8.43	261	0.779
% Asian non-Hispanic	6.87	422	7.45	161	6.51	261	0.675
% Female head of household	81.80	423	85.71	161	79.39	262	0.081*
% Married head of household	2.84	423	2.48	161	3.05	262	0.946
% Less than high school grad	21.62	421	18.63	161	23.46	260	0.148
% High school degree	31.83	421	31.68	161	31.92	260	0.844
% Attended some college	41.57	421	44.72	161	39.62	260	0.345
% BA or more	4.99	421	4.97	161	5.00	260	0.951
% Homeless	13.44	424	13.66	161	13.31	263	0.959
% Currently working	56.60	424	51.55	161	59.70	263	0.129
% Works full time (more than thirty-five hours per week)	28.30	424	26.09	161	29.66	263	0.562
% Commute > thirty minutes to work	34.03	238	36.14	83	32.90	155	0.598
% with car and driver's license	63.36	423	62.73	161	63.74	262	0.790
Number of children	2.22	425	2.19	161	2.25	264	0.565
Children's average age	6.62	412	6.63	158	6.62	254	0.869
B. Neighborhood-related questions							
% Starting in high-opportunity tract	12.57	334	13.49	126	12.019	208	0.730
% Satisfied with current neighborhood	50.76	396	50.00	150	51.220	246	0.831
% Would leave neighborhood if got voucher	53.16	395	52.67	150	53.469	245	0.748
% Feel they could find place in new neighborhood	54.76	378	57.14	147	53.247	231	0.488

% Could pay for a move	28.77	424	29.19	161	28.517	263	0.991
% Good with moving to racially diff neighborhood	78.44	422	74.38	160	80.916	262	0.145
% Good with moving to specific neighborhood in opportunity area	71.70	424	67.08	161	74.525	263	0.162
% Considering different school for any child	58.36	329	59.52	126	57.635	203	0.819
% Unsatisfied with any child's current school	14.59	329	19.05	126	11.823	203	0.094*
% Primary motivation schools	42.45	424	39.13	161	44.487	263	0.276
% Primary motivation safety	21.46	424	19.25	161	22.814	263	0.321
% Primary motivation bigger/better home	15.80	424	19.88	161	13.308	263	0.081*

C. Characteristics of origin neighborhood (census tract)

Predicted mean household income rank ($p = 25$)	43.91	419	44.07	158	43.81	261	0.498
Incarceration rate ($p = 25$)	2.14	419	2.10	158	2.16	261	0.636
Teen birth rate (women; $p = 25$)	23.09	419	22.43	158	23.49	261	0.183
% in poverty (2016 ACS)	16.58	419	17.07	158	16.29	261	0.541
% Black (ACS 2013–2017)	11.40	419	11.79	158	11.17	261	0.587
% Low-income third graders proficient in math (2015)	41.37	410	41.22	153	41.45	257	0.909
% in extreme poverty tract (2016 ACS)	2.63	419	1.90	158	3.07	261	0.336

F-tests

	F-statistic	p-value	N
Unconditional on lease-up	0.847	0.735	425
Conditional on lease-up	0.697	0.917	356

Source: Authors' tabulation.

Note: This table compares the households in the qualitative sample to the households in the full experimental sample. The qualitative sample is composed of all households successfully interviewed for the qualitative study. The set of households not in the qualitative sample is defined as all households in the experimental sample who are not included in the qualitative sample. In the last column, we show the p -value for a test of the difference between the qualitative and non-qualitative-sample means, estimated by regressing the relevant outcome variable on the an indicator for being in the qualitative sample along with the PHA indicator. We report an omnibus test of balance between the two samples by regressing the qualitative sample indicator on all variables shown in the table, plus a PHA indicator, and compute the resulting F-statistic for the joint significance of these variables (excluding the PHA indicator). We do so in two ways: first, for all households who were issued a voucher, and second restricting the sample to households that either leased-up and were not part of the qualitative study or leased-up and were interviewed for the qualitative study after lease-up. All regressions use robust standard errors.

* $p < .1$; ** $p < .05$; *** $p < .01$

sations), and conversations that took place over the course of the interview itself.

We also conducted selective ethnographic observations of program implementation, including: three in-person observations of families with CMTO staff at their initial one-on-one meetings; attendance at two CMTO full staff meetings; four informational meetings with all of the CMTO family and housing search assistance team members, two by phone and two in person; four in-person meetings with CMTO study intake staff at both SHA and KCHA; and one informational meeting with staff from the KCHA voucher program. We also rely on seven interviews conducted with all four Navigators, who delivered the primary CMTO services, and one of the CMTO study enrollment and group briefing specialists who pulled families off the voucher wait list, worked on their applications, enrolled them in the CMTO study, did random assignment, and held the informational briefings to introduce families to CMTO.

ANALYTIC APPROACH

The qualitative analyses were done in several stages. We coded the data from treatment group participants for a range of mechanisms that might underlie the experimental results (for more, see Bergman et al. 2023). These mechanisms included emotional support and communication, motivation to move to opportunity areas, streamlining, landlord brokering, and short-term financial assistance. We read the full text pertaining to each of these codes across cases, identifying a range of commonly occurring administrative burdens in housing searches and, in turn, the ways that CMTO helped alleviate them (reflected in table 2). We were particularly struck not only by the prevalence of psychological costs voucher holders face, but also by their descriptions of how interactions with CMTO Navigators reduced these costs.

As a next step, we undertook a deeper analysis within cases to better understand how the program worked to overcome psychological costs in the context of the participants' lives. We created analytic synopses for each case, pulling direct accounts from interviews focused on personal background, trauma, and

residential history; housing trajectories and barriers encountered during housing searches (credit, landlord rejections, eviction, homelessness, shared housing arrangements); their broad descriptions of CMTO and Navigators; specific aspects of the CMTO move that were difficult and how Navigators made them easier; and how participants compared previous housing searches with the CMTO move. When offered, we included reasons respondents gave for why Navigators were helpful for their particular challenges.

Drawing on these synopses, we created a process model, shown in figure 2, to describe how CMTO worked to support residential choices and opportunity moves in particular. We also used these individual case analyses and full transcript readings to create the variables used in table 3 to describe the prevalence of housing instability and trauma to better contextualize a given respondent's history. We show how CMTO worked from the perspective of families who were assigned to the treatment group, and contrast these experiences with those of families in the control group who—although they also had vouchers—did not have the same level of support during their housing searches.

FINDINGS

Administrative burdens emerged throughout families' experiences using vouchers, as summarized in table 2, including learning, compliance, and psychological costs (Herd and Moynihan 2018), and reflected elements similar to those highlighted in Claudia Aiken, Ingrid Gould Ellen, and Vincent Reina (2023, this issue) as burdens in rental assistance programs, including the toll of waiting and uncertainty. To understand how these burdens created barriers to high-opportunity moves, and how CMTO reduced these costs to change families' experiences, we examined how these costs manifested across the voucher experience and interacted with one another in the housing search process. Figure 2 depicts how this CMTO service model works to support more challenging housing searches and increase the number of families with leases in opportunity areas.

Table 2. Housing Search Burdens and How CMTO Reduced Them

Burden	Typical Housing Voucher Search Context	CMTO Program Context
Learning costs	<ul style="list-style-type: none"> • Hit and miss search for affordable units in the PHA jurisdiction and with landlords willing to accept the voucher • Onus on participant to understand voucher limits relative to contract rent • Understand and self-advocate for tenants' rights and Source of Income (SOI) protections • Identify sources of financial assistance for lease-up costs • Limited resources on available/accessible units and/or on neighborhood amenities • Limited resources to understand PHA jurisdiction and geographic limits • Limited resources to understand all timing and administrative processes required for voucher use prior to expiration • Limited insights into credit issues, criminal record, or other records until shared by landlords upon application denial 	<ul style="list-style-type: none"> • Meetings with Navigators to review different neighborhoods and how they fit into the goals and needs for parents and children • Website that let searchers know whether an address is in an opportunity area (OA) • Navigator to work with landlords to participate in the program and share unit vacancies • Navigator to provide lists of units of available/accessible units as well as customized neighborhood and unit visits • Navigator to educate landlords and families about SOI protections • Navigator to provide families with credit scores and other supports to gain awareness of possible record barriers and to develop mitigation plans • Increase the timeline for addressing learning costs by backing the search process out to include a pre-voucher issuance period
Compliance costs	<ul style="list-style-type: none"> • Provide landlords with required application paperwork including proof of income • Cover application fees, credit checks costs, holding fees, security deposits, and other expenses • Negotiate final rent and utility costs • Shepherd interactions between landlord and PHA (inspection, rent reasonableness, lease) 	<ul style="list-style-type: none"> • Navigator to streamline both the paperwork and financial costs of rental applications, housing quality inspections, security deposits • Navigator to accompany family on unit visits to negotiate with landlords about rent/deposit in the face of credit/eviction barriers • Navigator to not just streamline but also "validate" the financial assistance administration

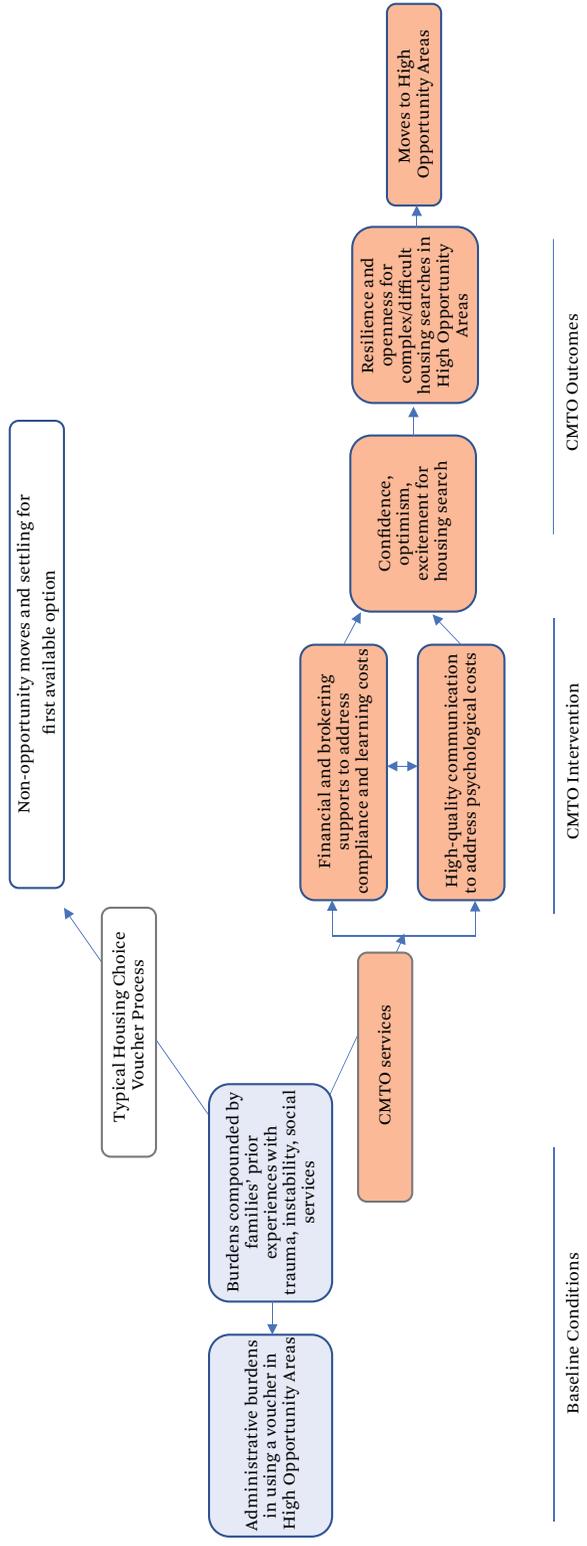
(continued)

Table 2. (continued)

Burden	Typical Housing Voucher Search Context	CMTO Program Context
Psychological costs	<ul style="list-style-type: none"> • Demoralizing experience to have to “convince” landlords to participate in the HCV and to rent to them in particular • Fear of rejection for units because of historic experiences and/or anticipated treatment due to credit/eviction history, SOI, or race/ethnicity • Perceptions of discrimination by landlords or of being “steered” away from OAs because of race/ethnicity/class • Perceptions that vouchers cannot be used in OAs • Stress and worry about voucher expiring and losing voucher • Juggling housing search alongside other time and resource demands (i.e. bandwidth tax) • Feeling poorly treated or unheard by service agencies and landlords, with few communication resources recourse options to respond to challenges • Demoralizing experience of having to cobble together borrowed money from family and friends or apply to myriad other services for financial assistance • Worrying about “bothering” staff 	<ul style="list-style-type: none"> • Increasing confidence and optimism about the success of housing searches in opportunity areas • Navigator to help families feel supported, respected, heard, and as partners in the process • Guidance “every step of the way”—not abandoned. after a short period • Advocacy and brokering with landlords to support communication and help families feel less nervous and more seen • Assistance for families with preparing scripts and resumes to approach landlords

Source: Authors’ tabulation.

Figure 2. Conceptual Model of How CMTO Supported Opportunity Moves



Source: Authors' tabulation.

Table 3. Personal and Housing History for CMTO Treatment Group, Opportunity Movers

	N	Percent	Total Sample
Personal history			
Trauma or abuse	37	50	74
Sexual abuse or domestic violence	19	26	74
Psychological or emotional abuse	21	28	74
Premature death, loss of family or partner	15	20	74
Addiction	7	9	74
Health shock	32	43	74
Housing history			
Ever doubled-up	54	73	74
Ever homeless	32	43	74
Ever evicted	11	15	74
Credit problems	30	41	74

Source: Authors' tabulation.

WHY IS IT SO HARD TO USE A VOUCHER TO MOVE TO AN OPPORTUNITY AREA?

Housing choice vouchers are not an entitlement: only one in four eligible people ever receives a voucher (Center on Budget and Policy Priorities 2021a). To begin the process, families sign up for a wait list where they can wait, in some jurisdictions, for five to ten years or more (Acosta and Gartland 2021). In the face of stagnant voucher supply and increasing demand, many PHAs have moved to a lottery system wherein only a subset of eligible applicants are even placed onto the wait list. Wait list practices vary by PHA, so families must keep track of specific timelines and processes, such as online application portals or in-person application requirements. Families who do make it onto the wait list must then comply with administrative processes to remain active: staying in communication with PHA contacts, updating PHAs of changes in contact information or eligibility criteria, and monitoring their ranking on the list. Similar to the childcare wait list burdens that Jennifer Bouek (2023, this issue) highlights elsewhere in this issue, these processes burden applicants, who may fall off of wait lists without knowing they have been removed and without ever receiving a voucher offer.

Applicants who remain on the wait list are eventually selected in what is perceived as an opaque and unpredictable process (Rosen 2020; DeLuca, Garboden, and Rosenblatt

2013). Once contacted for voucher eligibility, families must suddenly go through income-determination and background check processes that can require multiple types of documentation, meetings at PHA offices, and authorizations to release income, criminal, and rent payment histories. This process can take several weeks to months, and typically requires applicants to remain in continuous communication with PHA case workers. Once deemed voucher eligible, participants may be required to attend group briefings held at the PHA during business hours, lasting up to three hours (Schwartz, Mihaly, and Gala 2016). This is a moment when, after years of waiting and jumping through administrative hoops, many families consider themselves the lucky ones to receive what is known as the golden ticket voucher. In reality, this is just the beginning of their process to find a home.

As soon as families receive their voucher, the clock begins ticking: they must typically lease within sixty to 120 days before their voucher expires and they are sent back into the applicant pool to wait again. Second stage take-up pressure to use the voucher (see Aiken, Ellen, and Reina 2023, this issue) is felt strongly by voucher recipients and shapes the nature of the entire housing search and residential choice process (DeLuca, Garboden, and Rosenblatt 2013). Searches are not only stressful because of the time pressure, they are taxing for parents who are juggling multiple jobs, have only limited

transportation options, and face childcare constraints.

Voucher holders trying to move to high-opportunity areas face even more burdens or higher "redemption" costs, as noted elsewhere in this issue (on the WIC program, Barnes, Halpern-Meekin, and Hoiting 2023, this issue; on emergency rental assistance, Aiken, Ellen, and Reina 2023, this issue). Voucher holders trying to move to high-opportunity neighborhoods must also lease in a private market that is more expensive, often unfamiliar, and more hostile to the voucher program than in low-opportunity neighborhoods (Rosen 2020; Wood 2014).⁷ Despite increases in the prevalence of formal legal source-of-income (SOI) protections, in most jurisdictions it remains legal for landlords to discriminate against voucher holders because they are trying to rent with vouchers (Cunningham et al. 2018).⁸ Laws prohibiting SOI discrimination are difficult to enforce. Families with vouchers face repeated rental application denials based on income, race, or credit (Reosti 2021), making it difficult to find housing anywhere, especially in high-opportunity areas. Melinda, a Black CMTO participant who eventually moved to high-opportunity Bellevue, explained the heightened scrutiny she felt searching in opportunity areas, "I just feel like I have a little bit more to prove with the Section 8 voucher and [in] those nicer areas . . . they don't want a ghetto tenant . . . [versus] out here [low-opportunity areas] where they are just like 'Yeah, come on.'"

In jurisdictions where SOI discrimination is illegal, some landlords use credit and monthly income as screeners instead. Frequent denials for credit or income issues not only eat up time on the voucher clock but also make communicating with landlords burdensome and emotionally difficult (see also Garboden and DeLuca 2013). Rejection because of credit problems is demoralizing. As Chris, a White mother

who lived in hotels to cope with unstable housing, put it, when you get rejected because of your credit, "It just feels like you didn't get the job, you know?"

Even when landlords are open to voucher holders, they must abide by Housing Quality Standards verified through an inspection and comply with other paperwork requirements and rent reasonableness standards to participate in the HCV program (DeLuca, Garboden, and Rosenblatt 2013). These processes can hold up a move and possibly result in a failed lease, in which case families have to start searching again. In the process, they may have paid for nonrefundable application fees, holding fees or other costs.

Administrative delays caused by uncooperative landlords, long search periods in areas with low affordable housing supply, and having to request voucher search extensions from the PHA not only increase the costs of participating in the HCV program but also can result in the loss of the housing voucher and all of the time and energy invested by the voucher holder. Under such anxiety-inducing circumstances, it can be difficult to use the voucher at all (Devine et al. 2003). Low-income families often develop a sense of frustrated exhaustion and residential pessimism: it is hard enough to find a place to live but unimaginable to find a good place to live in a desirable neighborhood. Families feel they must "take what we can get" and rely on units owned by the landlords who are most willing to take vouchers and who tend to be in high-poverty areas (Rosen 2014; DeLuca, Garboden, and Rosenblatt 2013; Wood 2014). Given that most families have experienced long stretches of housing insecurity by the time they receive the voucher, families are pulled to move into the first housing available. Families may be so desperate to leave a shelter or couch where they are staying that any housing option seems better than none, and searches in op-

7. Payment standards for rent are typically set at the metro area and are often too low to be useful in high-opportunity areas. The Small Area Fair Market Rent payment standards of the Seattle and King County PHAs increased the feasibility of using vouchers in high-opportunity areas in CMTO.

8. Indeed, this may be rational for landlords: tenants qualified to lease in such a neighborhood based on private means are unlikely to move out over anything other than major unresolved complaints, whereas landlords perceive HUD inspections, which are intermittent and over which voucher payments can be lost, to happen at random and be capricious (Garboden et al. 2018).

portunity areas are not only daunting but a luxury they cannot afford with limited voucher search time. Although the voucher program may succeed in providing much-needed housing, steep learning and compliance costs coupled with psychological costs can lead to a pervasive fear of failure in using the voucher that prevents many families from enjoying real residential choice as proffered by the HCV program.

Accounts from CMTO control group families we interviewed provide vivid examples of these challenges. Monique, a Native American mother, said it was difficult to find a place, especially while working: “It’s like I don’t have much time because apartments will close like five, six o’clock, and so then I have to use my weekend to go out and then on the bus it takes time, so that was the hardest part . . . and then actually just waiting to hear back [about units.]” Fadumo, a Somali mother, had paid application fees for several places only to find one failed the housing inspection, others were already in the process of being taken by other tenants, and time was running out. She turned to our research team member who was interviewing her, and in desperation, asked, “Do you have someone who can help, anyone who can help?”

Amy, a Black mother of a two-year-old and a five-year-old, explained how rejections from landlords affected an already challenging housing search, “What made it even more difficult is when you tell these landlords that you have Section 8, they look at you like you’re crap, pretty much. . . . [They say,] ‘No, we’re not approving you because of that.’” Alexa, a White mother with three children in Kent, described landlords who came up with other excuses to reject voucher holders, because source-of-income discrimination is illegal in Washington State, “they say, [instead] well we won’t pass their inspection, or they won’t reply back, or they just will plain deny you because you have it and they’re not supposed to. So, it’s been a struggle.”

Amber, a Black mother of two, she said that she was surprised when, after she found a rare three-bedroom apartment, she was not offered the lease because of a credit problem. She paid the outstanding bill on her credit report but misunderstood that it would still not resolve

the issue: “I paid it and I never knew it was gonna take up to thirty days [to show up]. And I never knew they wasn’t gonna hold the apartment either . . . So I was on it, like why don’t I just call her every day, check in with her, send her emails that the . . . people that did the credit background will send to me, but she’s like, ‘There’s nothing on my end I can do unless *they* sent something.’” Not only did Amber lose the unit, she also lost the voucher and spent nearly all of her savings—\$1,700—to pay the bill she believed would repair her credit and secure her housing.

What is especially notable is that more than a quarter of the control group families tried to search in opportunity areas despite having none of the CMTO resources. Their accounts reveal the challenges for families who try to find housing in opportunity areas on their own. Jasmine, a White mother, ended up in a non-opportunity area that was not her first choice: “So my preferred like nice area to where the more people that had money area . . . but it was harder to do because of my credit . . . and I didn’t have a high[er] deposit.”

A Black control group mother, Cece, had been determined to move her children to North Seattle, an opportunity area, so that they could receive a better education. However, her work schedule made it impossible, as she explained: “I work graveyard shifts, so imagine me going to work at like five o’clock and coming back home at three or four o’clock in the morning and up trying to do searches and trying to get stuff, you know what I mean? It was really frustrating and I almost just was like . . . well, if I have to move back down south [low-opportunity area], I will . . . this is not working out like I thought it would work out.”

WHERE FAMILIES ARE COMING FROM: TRAUMA, HOUSING INSTABILITY, AND SOCIAL SERVICES

By the time participants begin a voucher housing search, most have experienced challenges, some ongoing, in one or more domains of their lives, which can exacerbate housing search costs. Understanding families’ backgrounds helped us appreciate why the CMTO Navigators’ communication strategies were so essential for overcoming the families’ initial fears,

not just about social services, but also about the prospects of a successful housing search. The rates we present here are likely lower bound estimates because we did not ask about these experiences directly, they emerged naturally while asking people to tell us about their lives.

As presented in table 3, half (50 percent) of the treatment group families interviewed who moved to opportunity areas described traumatic experiences, including emotional, physical, and sexual abuse, as well as the premature deaths of family and friends. More than a quarter (26 percent) mentioned domestic violence; almost 9 percent reported struggles with addiction at some point; and more than 40 percent reported significant health issues of their own or within their families. Many parents also recounted that unstable housing histories had made it difficult to focus on their education, children, and jobs. Some told us that they moved in and out of housing with abusive partners or into unsafe and crowded conditions because they felt they had no choice. As they shared their residential histories with us, 73 percent mentioned being doubled up at some point; 43 percent referred to periods of homelessness, including temporary or unstable housing arrangements, such as couch-surfing, living on the street or in a car, or staying at a shelter or a motel; 15 percent reported ever being evicted. Credit issues exacerbated housing instability, and made people pessimistic about the prospects of finding good housing. Although we did not ask directly, just over 40 percent of the treatment group mentioned that credit problems had affected their ability to rent housing.

To cope with housing insecurity, health issues, and their children's needs, many parents we met turned to nonprofit and government resource providers. Some of these experiences provided much relief, but others made families feel cynical, mistrustful, and suspicious. Numerous families explained having to "jump through hoops" to access prior housing assistance or other public assistance and remarked on inconsistencies in how decisions were made, spotty communication with caseworkers, and opaque bureaucratic processes.

Tina's story captures several of these ele-

ments and is typical of the cases in the treatment group who faced the most challenges. Tina, an American Samoan thirty-one-year-old mother of three, grew up experiencing over a decade of housing instability and the death of her younger sister, which Tina believed was from a drug overdose. She became pregnant at eighteen, and moved into her first apartment with her children's father and a roommate, but no furniture or food. During this time her partner was drinking and disappearing, so she was mostly on her own to cover bills and care for her child. When the arrangement began to "fall off" with the roommate, the couple moved again. Screaming fights with Tina's partner sometimes prompted a neighbor to call the police. When this happened, Tina hid her child in the closet so that Child Protective Services would not come. Eventually they moved again, and had a second child, living together until "things got bad again." Tina left with her children and became homeless, at times having no access to electricity or water. She finally got food stamps, began working, and rented a motel room, but that became untenable because of her children's safety and pressure from the manager to leave.

When they reached their fifteen-day limit at the shelter, Tina reunited with her children's father and they found another apartment, paying the deposit with the last money they had—her partner took out a loan just to pay for food. They stayed in that place for two years, during which time Tina had to have her gallbladder removed (resulting in medical bills causing the poor credit that CMTO would eventually help with). Then Tina was called for Catholic Charities housing, and she and the children moved into that townhome, where they lived until Tina got her CMTO voucher and we met her.

Simone, a Black mother of an eighteen-month-old daughter, faced personal challenges similar to Tina's. Simone explained that her repeated moves between houses made it difficult to focus on her education: "I can't even focus on schoolwork and getting this stuff turned in on time, because it's still always goes back to I need a place to stay that's stable. . . . I was doing good [getting As], so it hurt my feelings that I had to withdraw from school because I just had to focus on housing." The search for hous-

ing, and patching together other financial assistance, was distracting and took a toll. She continued: “It’s like sometimes I can’t get excited over things that I should be excited about, because I’m just so mentally drained. I’m trying to fax papers to this department to get this in on time, got to wake up, I barely get four hours of sleep every day, because, like currently, I’m in and out of hotels, spending my money on hotels because I just can’t be in a shelter . . . [where] my baby to keep getting sick, then I got to miss work.”

What becomes clear from our interview data is that the difficulties of finding housing with the voucher existed alongside very taxing circumstances for our participants, which in turn complicated their housing searches. Because of credit issues, unstable incomes, and unpredictable family situations, participants expected little from their housing searches and at times were ready to take any kind of unit to avoid homelessness—an orientation which typically forecloses on opportunity moves.

HOW CMTO REDUCED LEARNING AND COMPLIANCE COSTS

Experimental results showed that the CMTO treatment increased the share of families who leased units in high-opportunity neighborhoods by 38 percentage points (Bergman et al. 2023). Conventional models assuming that housing voucher recipients act as rational economic actors who face no additional costs to searching in high-opportunity areas predict that the CMTO program success should be driven through financial incentives and new information. Some of these resources were certainly important—more than 80 percent of participants described the CMTO financial assistance as a helpful part of their searches. But our fieldwork with families also revealed that these resources were insufficient without the skilled support of CMTO Navigators who helped guide families through the search and lease processes in ways that significantly reduced learning and compliance costs that are more pronounced in opportunity searches.

Reducing Learning Costs

In table 2, we outline how CMTO services addressed many of the administrative burdens

families faced when trying to use their voucher in opportunity areas. During initial briefings, CMTO intake staff discussed the neighborhoods where CMTO could provide additional resources to support moves and went over the benefits and amenities of these areas. Once families received their vouchers, they met one-on-one for the first time with the Navigators, who got to know families, went over the opportunity maps, and discussed how different neighborhoods might work for families’ specific needs. Navigators broke down the voucher search timeline so that families could better anticipate each step in the process and have a clearer understanding of whether time was running out. To help families consider a range of opportunity neighborhoods in their search, Navigators provided participants with neighborhood descriptions, tailored information on neighborhood resources that might be of interest based on what they were hearing from participants—schools, afterschool programs, local stores, and social service options—and neighborhood tours of opportunity areas.

Navigators also supported families in their use of search resources such as the CMTO website that identified whether a particular unit was within an opportunity area, clarified voucher documentation that families received at their PHA briefing, and provided recommendations on how families could put together a rental resume and other key background information in advance of submitting a rental application. In a similar vein, Navigators helped families make sense of credit report scores and begin building a plan to mitigate low scores as necessary. Once families’ housing searches had progressed to unit applications, Navigators continued to reduce learning costs by sharing listings of available units and accompanying families to some unit showings to speak directly with landlords and explain the CMTO program.

Streamlining Compliance Costs

Voucher administration is rife with compliance requirements to ensure that vouchers are used for units that meet market prices and quality standards. Administrative activities were also layered into the CMTO process to ensure that tenants met landlords’ requirements, that lease

agreements complied with local laws and PHA policies, and that the three-way arrangement between landlord, tenant, and PHA was clear. Typically, the HCV participant must navigate each of these compliance considerations despite new and complex information. In opportunity areas where landlords are less familiar or less comfortable with vouchers, this burden is greater. Navigators reduced these compliance costs by streamlining administrative processes, including applications, housing inspections, and lease signings. Navigators assisted with unit showings, helped file paperwork, and answered landlord and family questions. Administrative processes were smoother and faster, keeping landlords engaged to ensure successfully executed lease agreements.⁹

When administrative barriers did arise, such as a credit score that fell below a landlord’s minimum threshold, a rent amount that was slightly over the fair market limit, or a unit that failed minor inspection standards, Navigators often served as a direct bridge between landlords and families to facilitate solutions without families or landlords losing time or money. These strategic negotiations with landlords helped during points in the process that were otherwise discouraging for families or a point of exit for landlords. Even participants who found their own units noted that Navigators communicated with landlords to mitigate unanticipated stumbles or close the deal. At times, Navigators acted as references for families’ rental applications. Nina, a Black mother of two, told us that a Navigator helped her after she was denied units because of her credit and background check. She explained, “[The Navigator] advocated for me and got me an appeal and then I had to get reference letters from my doctor, my pastor, then they approved me.”

Beyond just making CMTO financial resources available, Navigators streamlined the allocation of these resources in ways that would have been challenging for families to do on their own. Navigators issued direct payments to landlords, used direct credit card access for application and administrative fees, and negotiated with landlords when requested leasing

costs were infeasible. Such streamlining was critical given families’ bandwidth constraints. Peter, a Black father, said, “Being a parent and working, I’m kind of like spread thin, so that [CMTO] really you know helped me be solid when it went to apartment hunt.” Stive, a Russian father in Bellevue explained, “[CMTO] Cutted [cut down] many work for us. . . . I was grateful to get the support from her with that going smoothly through the process of applying, new landlord and making application.”

In sum, Navigators made the whole process easier; for their services to work, however, families also had to be engaged in their searches. Although Navigators often sent direct referrals for interested landlords, took families on searches, or negotiated directly with landlords, families were also active in housing searches and in staying receptive to the Navigators’ communication.

REDUCING PSYCHOLOGICAL COSTS THROUGH HIGH-QUALITY COMMUNICATION

In addition to reducing administrative burdens, CMTO worked because of the high-quality communication and interactions between Navigators and families, which were particularly effective in reducing psychological costs. Moreover, the financial resources and landlord brokering assistance overcame learning and compliance costs because they were administered through these high-quality interactions. Given the complexities and costs in navigating the voucher program and the experiences that families had before the program, a conventional approach of layering more information—even alongside voucher resources—was unlikely to greatly improve neighborhood outcomes and increase choice. CMTO was effective in increasing opportunity moves because it changed not only what services were offered but also how they were offered. The interviews revealed three key aspects of this communication: accessibility (Navigators were responsive and available as needed); collaboration (Navigators were respectful, nonjudgmental, and worked with families during their

9. The HCV unit inspection is perceived as a long, arduous process by landlords and a disincentive to HCV participation.

housing searches); and pertinent content (Navigators provided customized, useful, concrete, and timely resources and information about units in opportunity areas).¹⁰

Accessibility

These dimensions of communication were made evident to families almost immediately. During the first CMTO voucher briefing, families were invited to meet at the PHAs in modernized conference rooms with large screens and tables displaying snacks and water bottles. Attendees were provided with colorful tote bags full of their CMTO and voucher paperwork packets, and the sessions were run by enthusiastic staff who shared information with humor, optimism, and warmth. During and after these presentations, staff paused often to field questions, relate, and connect. The next point of contact came when Navigators reached out to families for their first of possibly several one-on-one meetings, where the Navigators focused on getting to know families. One of the Navigators described the purpose of these initial meetings: “I think the main components for such meetings is for me to get to the know the family, understand their barriers and build that relationship and once that’s filled, we can kind of like collaborate together, to addressing like their needs and their barriers and what they want from their move and for the kids. I think the relationship is a huge part of why all these services work.”

Once Navigators met families and built initial rapport, and after families started the housing search, they adapted their approach depending on how the search was going and how families engaged with them. While Navigators reached out to all families proactively and frequently, they were also responsive to families’ different housing search needs, “know-how,”

and resources (such as transportation or comfort talking to landlords). For some parents, like Simone, a Navigator supported the beginning of the housing search and stepped back when it was clear that she wanted to do the rest on her own. As Simone described it to us,

[the Navigator] might have thought that I was going to be one of those that was going to be so needy, like, I didn’t have that mental [capacity] to handle certain things, and she didn’t realize that I have a car . . . [at first] she didn’t understand that I just need a list of some that you know that takes Section 8. . . . Let’s just get to the point, and give me what I really need, and let me go from there.” She appreciated me just telling her straight . . . I need help, but I’m not slow-minded to certain things.

Other participants conveyed that their housing searches were successful because the Navigators provided consistent and more expansive support when needed. One of the Navigators said that they recognized this need for some families: “Just talking about it once in one meeting is probably not the only time they’re going to want or need a little bit of extra help with that.” Jennifer, a Black mother of four with a long history of housing instability, needed more than just some initial help. Her first attempt to find housing failed when the unit started flooding. She told us, “[The Navigator] went above and beyond and was like, this is what you need to do. I’ll send you this email. Do this. Call these people. Even after I first got situated, she helped me to find childcare resources and things like that. So she was just really helpful.”

Mona, a Hispanic mother of two, was unstably housed and in an abusive relationship when

10. We coded data from all of the treatment families who moved to opportunity areas, and found evidence for the importance of communication overall, and of these three aspects in particular. 69 percent of participants mentioned communication with Navigators as one of the first things they said about CMTO, or as one of the “best” aspects of CMTO, 63 percent mentioned accessibility, 57 percent mentioned collaborative aspects of their housing searches with Navigators, and 43 percent discussed how their interactions with Navigators provided pertinent information for their searches. Because we did not ask respondents directly about these aspects of the program but instead generally to tell us about CMTO, we consider these prevalence rates to be lower-bounds, and present them to show that the cases we present in detail are not singular examples but typical of at least half of the families who moved to opportunity areas.

she received the voucher. The Navigator maintained consistent support and communication, even when Mona was still living out of state. Mona described this:

Me and [Navigator] were actually talking on and off in Colorado. [We] were supposed to FaceTime [but] I was too embarrassed for her to see where I was at. So I would just make excuse. And then finally, when I moved here, I even tried to make an excuse because we’re living [in a motel]—there’s like these ghetto places. And [Navigator] called and she said she’d come visit. I was like “Can we meet up somewhere?” And she’s like, “No, I can go to where you’re at.” She showed up at my motel.

A prior eviction connected to a former partner contributed to multiple housing denials, the need to request an extension on her voucher timeline, and stress in trying to find a place. Eventually the Navigator helped Mona have her eviction removed from her record and lease an apartment in an opportunity area. She explained, “[She] helped me a lot. . . . she was on top of everything for me. If it wasn’t for her, I honestly think I would have lost my Section 8 because nobody was willing to give us an opportunity.”

In adapting their responses to families’ individual circumstances, Navigators ensured that communication remained open throughout the process, increasing the frequency when needed and being available for quick check-ins and at nontraditional hours. As one Navigator said, “[We] try not to let it go longer than two weeks with [families] having [not] received something from [us].” Maria, a Black mother living in Auburn with three boys, appreciated this connection and described her Navigator as someone who “kept checking in.” Tiffany, a White mother with one son, moved to an opportunity area in Bellevue. When she told us about her housing search, she noted, “If I had any questions they [Navigators] both responded really quickly, when it was time to pay for vouchers and stuff, I send her a text and within a couple of hours she had it taken care of so it was super convenient.” Nicole, a Black mother, was impressed that her Navigators would reply

to her texts as soon as they could and told us, “If they couldn’t answer the phone, they would text, ‘Hey, I’m in a meeting, is it okay?’ or ‘What’s going on?’”

Collaboration

Some families had come to the CMTO program with mistrust about assistance programs, something Navigators had to overcome. For example, at her first Navigator meeting, Stacia, a mixed-race mother in Renton, told us that initially she thought, “Nope, I don’t wanna do it,” assuming it would be another degrading social service experience full of requirements, and that her “experience like with DSHS [is that] they’re gonna look for flaws in what your story is and . . . stop what you’re trying to do.” She found, however, that with CMTO, the “[Navigator] said it’s optional you don’t have to do it,” and she realized that CMTO didn’t “wanna ruin something for you or take it from you . . . that was my main fear.” Stacia was still contending with a domestic violence situation and felt overwhelmed: “So, I’m just so used to that ‘nope’ over one detail . . . and I asked them more out of like anxiety and stress . . . but they were so nice.”

Maya, an Hispanic mother of three, noted, “They are very nice people, very approachable; they are open to all your questions.” Odyssey, a Black mother, told us that the Navigators helped her with everything from finding the unit to getting some furniture. But she emphasized, “It was just, they were *very kind* about it.” Yaya, a Black mother who traveled across the country to participate in CMTO, compared it with her experience in New York, “[Here] they moved very quickly. New York can tell you thirty to ninety days or sixty to ninety, they don’t know. They never give a good response. [My Navigator] always gave positive energy, positive feedback, very uplifting and very encouraging. And very good energy from them I got. I was really impressed.”

During the one-on-one meetings, families sat with Navigators together at a table to discuss housing search preparation and planning, both looking at vividly colored maps that showed amenities by neighborhood. The conversations we observed were back and forth exchanges, where Navigators asked families what

they wanted in a neighborhood, what their children's needs were and where they worked or wanted to work. Navigators cross-walked those ideas and plans with different neighborhoods that might be a good fit. Rather than being talked to, families were talking with Navigators. They organized a plan for the housing search, replete with notepads and forms to assist their efforts, such as call logs, calendars, and sheets that allowed for planning in stages. In one meeting we observed, a Navigator met with a woman whose husband had recently died, leaving her strapped for resources for her and their young son. As a result, she was bouncing between living arrangements when she signed up for CMTO. During the session, as the Navigator described the amenities in different places she could move to, she said, "Yes, these places, this is in line with my idea of who I want to be." In particular, with a partially completed degree from the University of Washington in hand, she wanted to go back to college, and was interested in where the community colleges and universities were.

As one of the Navigators explained, "I think it [these meetings] really help[s] like paint a picture of what they're looking for, where their job is, where their social connections are." Building this relationship allowed Navigators to better understand and empathize with respondents, enabling them to customize help in a way that, as a Navigator said, "will make sense for [families'] lives." Aliyah, a Somali mother, described her dynamic with the Navigators, "It was the fact that they were involving me into things. I was getting calls, 'How are you doing? How is the hunt? How is everything? Let us know what we can help you with.'"

Parents appreciated that it was collaborative. One White mother in Seattle, Bailey, said, "They made me feel like they were there to work with me and not against me." Nicole told us that CMTO played a "very important" role in her getting an apartment, not only because of the financial assistance, but also because she and the Navigators worked together. Nicole told us,

[It's] like 50 percent, it's 50 percent you cuz, you know, you're looking for the place [too]. . . . If you need help, if you don't know

where to look, if you are coming up short, if you're coming up with no's, if people don't understand your paperwork, if you don't understand your paperwork, you have to—I feel like communication is the key with CMTO. Like, yes, they're there to help you pay your deposit. . . . But if you're like me and you don't know any of these areas, you need help, you should probably use your CMTO person cuz they're there to help you but . . . you have to reach out to them too.

A few mothers remarked that the Navigators understood what it was like to be in the participants' shoes, in part because of Navigators' personal experiences but also because they took the time to get to know families. Sarah, a Black mother who had been on the voucher wait list for five years, explained: "The best part was having somebody that understood it and like I can vent to. . . . They knew what I was battling against. They knew my credit. They knew everything. . . . I'm like literally crying and you know, they answered the phone. They were like, okay, we going to try something else—[they] never made me feel like a burden. Ever."

Pertinent Content

As a result of their meetings, emails, and conversations with Navigators, families felt they were provided concrete resources and knowledge about opportunity area units, information that was right for them. Leah, a Hispanic mother, told us, "The [Navigators] . . . really know how things work and they have the right information. Like she right away told me these websites are going to help you, this app is going to help you, and I said I will take it. And she's explained to me how things are going to work, that really makes sense for me—because I was so confused. Like she said, I will call don't worry." As Katie, a Black mother, explained,

So [the Navigator] gave me a lot of information about certain neighborhoods. And then . . . like once I picked out neighborhoods that stood out to me, [Navigator] was able to go and like find places that have availability in those neighborhoods. And I really liked because—obviously they'd been doing it for a

while or she has been navigating Seattle for a while, because she literally knew like every place that had availability or that didn’t have availability or like which places had washers and dryers, or—when I found the apartment she was able to tell me like, “Yeah, it’s a super nice apartment, super big, and I think it’s going to be different for you. But it’s like a really large complex so you’re going to have to walk far for garbage, you like heat” all the details, like she knew.

Stive, a father of two who leased in east King County, saw the process as one that supported his own efforts, and felt that “because they gave me a lot of helpful information, presentations, booklets, letters [on] how to make my search even more productive,” he was able to “vet really quick the right place.”

Jade, a mixed-race mother, had prior experiences with housing programs and other assistance that made her wary of social services. She told us, “It’s just like, you have to jump through a lot of hoops to get help. And it’s hard enough to ask for help as it is.” She described that having the Navigators alongside her during the housing search helped in part because of their sheer knowledge of the area and the process, but also because the assistance was provided without her having to ask for it:

So I would text [Navigator] like, “Okay, I have a showing at this address at this time.” And if she was available she would meet me there so that she could meet with the people and show them she’s not just saying this, like, “We do pay this, and this is the income, or the pricing that is allotment for rent, and this and that, and we will help her with this.” So she kind of explained the program as well, because [it’s] a new program, and a lot of people had never heard. Some people didn’t know of Section 8, so she kind of explained that too. So it was nice to have someone who knows research and is knowledgeable about it so that if people have questions. . . . I didn’t have to say it like, “Let me ask that” or something. She was there to kind of answer what I couldn’t an-

swer. So it kind of gave more confidence to the people who weren’t against Section 8, like this landlord. They had never heard of the CMTO. I think it’s kind of more peace of mind that they know for sure that you’ll have the help and the resources. So I think that’s kind of what helped me get in here too.

Communication Helped Families Feel Confident

These effective and high-quality communication strategies not only had profound effects on how families perceived the usefulness of the CMTO program, but also on how they felt emotionally and psychologically. Interactions with Navigators made families feel cared about and confident, which helped increase openness to moving to opportunity areas and support beliefs that the process would actually work and produce different housing and neighborhood outcomes than past housing searches.¹¹ The program bolstered participants’ confidence and sense of efficacy in approaching difficult housing searches in an opportunity area, and it increased families’ trust in Navigators as advocates who understood their preferences.

Rather than just going through a bureaucratic exercise, Navigators communicated that they cared about what happened to families. Jennifer reflected, “I know that they have a huge caseload, but she still took the time out to help me with my situation and so I was more than happy with that. It was above and beyond.” Leah summarized her meeting with the Navigator, “Like she said . . . will be on your side and I will advocate for you.” Aliyah told us, “My best part was that I had a relationship [with the Navigators], like they were friends of mine that was trying to help me or family that was trying to help me.”

More than 60 percent of the participants we spoke with mentioned that Navigators provided emotional support and frequent communication, and commonly used words such as *helpful*, *positive*, *excited*, *boost*, and *confidence*. Racial, a White mother of two, reported feeling a “boost” after working with the Navigators: “Whatever your needs are, I think they’re just letting you know, ‘I’m here to help you.’” As

11. For example, without prompting, 33 percent of participants mentioned an increase in their housing search confidence while working with CMTO Navigators.

Stive, a father of two, put it, “Sometimes when someone cares about you, it’s priceless.”

Booth, a Black mother of two, who had never searched for housing on her own, explained:

I just think sitting there and talking to [Navigators] like, “Oh my god, this is like really happening,” you know? Like you’re getting housing, you’re becoming an adult. . . . we did the checking of my credit. We listed like what I wanted in an apartment, you know she told me like things to look out for, like holes in the cabinets and like rodent droppings. And they also give you like information regarding like if you feel like you’re being discriminated against which was very helpful and just like a bunch of just constant support. It felt it was very supportive doing with them.

Tina told us, “I was like, ‘You know what? I got into a good opportunity [with CMTO], let’s take the opportunity and let’s go and explore,’ and I did. You see, I’m [usually] afraid doing something.” Yaya explained it this way: “I’m open to exploring and trying to like rebuild my life—it’s a great opportunity. I’m really happy about it and [I’m taking] the steps that I need to get closer to the goals that I’m trying to reach while I’m out here, there is no distraction, you know, there is a lot of opportunity to [take] advantage of, so I would have to get things done while I’m out here. It’s exciting.”

NAVIGATOR SUPPORT HELPED FAMILIES SEARCH IN OPPORTUNITY AREAS

The consistent, collaborative communication and customized assistance families received went a long way in keeping parents motivated to continue the housing search, reducing the redemption costs (Barnes, Halpern-Meekin, and Hoiting 2023, this issue) that contribute to demoralizing experiences and low program take-up. Given source-of-income discrimination and limited affordable housing supply, credit checks, and eviction records, an unassisted search in opportunity areas is likely to take longer and applicants are likely to encounter more denials. Landlords in opportunity areas are typically less familiar with the voucher program, which increases the burden on par-

ticipants to educate landlords about the program and to convince them to participate. Moreover, search expenses may be higher because more application and holding fees are required to cast a wide-enough net for opportunity area units, and in the face of repeated denials.

The interviews suggest that families’ experiences with CMTO shifted how they framed their housing searches to be less about getting away from something undesirable and more about moving toward something positive. Navigators encouraged families to be proactive about their searches and not default to looking only in familiar neighborhoods, taking the first unit offered, or trying to meet only the bare minimum of housing needs. This approach supported opportunity searches in four ways that reduced psychological costs. First, Navigators helped families overcome worries about being rejected because of credit or source of income, framing such denials as a normal part of the housing search. Second, Navigators encouraged families to expect more from their housing search instead of settling for a unit or neighborhood that did not meet their needs. Third, Navigators increased families’ comfort and patience with uncertain, longer searches, and encouraged families to consider new places to live. Fourth, Navigators improved families’ confidence in communication with landlords at key moments.

Overcoming Worries About Rejection

One Navigator recounted that even getting to the point of putting in an application can be stressful for families who have had histories of rental denials and who feel pessimistic about their chances of getting accepted. As she put it, applications can be the “biggest barrier. . . . If you’re printing [an] application you have a decent chance.” Sustained communication with CMTO Navigators was thus especially important when searches took longer than families hoped. As Allison, a White mother, told us, “I was getting a little discouraged before [the Navigator] gave me the names of places. So that helped a lot.”

Katie recalled that her lack of credit was her “biggest concern” when she started, and explained how a Navigator supported her:

She gave me the idea to like start finding things that maybe could help work on my credit. . . . she really just kind of gave me a little bit more confidence in what I was doing. . . . I don't have any hope like—especially because before that I was looking by myself and I wasn't getting anything. . . . you have ninety days to move. . . . And I was like, "Yeah, well, one month down, might as well just go ahead and give them back this voucher" because I was really feeling like I wasn't going to find anything. And then like literally I got with CMTO and then two-and-a-half, three weeks later . . . I was signing the lease.

Even though CMTO Navigators leveraged their communication strategies to support these difficult moments, they also made that part of the process seem less like a failure, and more like something to be expected, which reduced stigma and shame. Jamila, a Black mother, said she heard this message from her Navigators throughout the search process. She noted, "I'll shoot her a text and say, 'Hey, I'm frustrated. It's so hard to find something. Is this normal?' So [the Navigator] would just like text me back, say, 'It is pretty normal. You will find something. Keep looking.' Or 'Here's some more [units to consider].'" After multiple denials, Sarah, a Black mother, got to a point, as she described it, "where I just stopped applying and stopped caring. And they [Navigators] were like, 'Come on, you know, this one might work. This one might be good.'"

Tina anticipated rejections from landlords during her search. "I found a few houses they're really nice, but I never went for it to meeting with the landlord because I knew with my credit, I was just like, 'No, they're not gonna let me.'" Then she described how her conversation with the Navigator shifted her perspective:

It was nice that where we had that meeting. . . . they were giving us a lot of heads up about, "Hey, if your credit is so and so this, that just to give you a head's up, you're gonna be cut.' So, I'm glad they said all that because I took it like, "Alright Tina, if it comes down to they deny you, it's alright, there's other opportunities out there." So I did cuz I'm the type where somebody deny me, I cried cuz I'm

like, "What did I do —" right? So, it's bad, like—but I'm glad that when every time I did know, it's like, "Alright, suck it up. . . . Let's move it forward, let's do another one, get back on the computer and look for some more."

Encouraging Families to Expect More

Stacia talked in detail about what it felt like to shift her thinking from not just moving anywhere, but moving to an opportunity area: "Their goal was to do was to actually put you in a . . . good area for children to be raised and things like that. So, I was like, 'Well, that's perfect 'cause that's really what I want.' You know, like I really wanted structure, for, you know, for my son and I wanna put him in a good area. So, I worked with them." Initially, Stacia struggled to secure a lease because of her poor credit history and unstable income. She was ready to give up and take a unit in a non-opportunity area because, "I was just worried about like being homeless again. . . . I was going to accept anything. . . . I was like, 'Oh my God, I don't wanna live in this area. . . . I don't wanna have to clutch my purse and try to be tough every time I go outside my house.'" She described how the Navigators stuck with her, answering her texts and emails, and offering her additional units to visit. Afraid she would "lose their attention," she felt reassured when they told her "they were helping with anything I needed until I quit." Eventually, Stacia leased in an opportunity area in Renton.

Like Stacia, Simone was ready to move "somewhere" after trying several places and getting rejected, when the family Navigator intervened. She told us, "That's when I started talking with [the Navigator], and that's when I told her it was Federal Way [a non-opportunity area], and she kind of started making me feel like, 'Oh, like I see something better than Federal Way for you.'" As she thought back on the experience, Simone reflected, "She just saw more in me, and she wanted to see a better situation for me, and I'm glad I did wait it out a little bit longer, and try her different options."

Given how unpredictable housing situations had been for many CMTO families, this was the first time some of them had the bandwidth and

guidance to make informed, preferred choices. Katie, a first-time leaseholder, explained that she was so worried about finding any housing, she had not slowed down to think about what else her housing search could offer. She told us,

You know, just like I was just so eager to get in the place that I wasn't I guess really thinking. Like I'm just so excited, like, "Let me try to see if this is going to work" . . . they made me realize the important stuff. . . . Not just like, "Oh, you're about to get an apartment, here are your keys." No, you need to make sure like it's a safe place, it's somewhere you could see yourself raising your kid. . . . on top of that like they kind of in a way helped me, I don't know, like get a voice maybe. Like as far as like being an adult and having to ask certain questions [about renting].

Increasing Family Comfort Levels

Some families also struggled with uncertainty about moving to new neighborhoods. In describing her search in opportunity areas, Lily, a White mother in Seattle who had a prior eviction and expressed anxiety over the housing search process, explained how CMTO Navigator support reduced her fears that she would lose out on units in high-opportunity areas: "Because if you were Section 8, it would take—without the CMTO, it would take a lot longer, because you have to wait for it to get approved, it just—it wouldn't have worked out, the [landlord] probably [would not] hold the place. This is a nice area and people were already coming [to] tour it and stuff like that, so I [would] have freaked out it would have been a long process."

Although most (72 percent) of the families indicated an interest in moving to opportunity areas in the baseline survey (table 1), many had never even considered some of these neighborhoods, assuming they were simply off-limits to voucher holders. One of the Navigators explained that many families "didn't even know they could use their voucher in Bellevue as far as any of these neighborhoods. . . . they thought, 'Well, I can never go to this neighborhood. Like I have to stay where I am right now, since [they're the] only people that will take me.'" As Deanne, a Black mother, powerfully related, "Until someone moves out

the neighborhoods that they are used to and get to see and be around other people. . . . because we can't see it, we feel like it's unreachable."

Other families told us that they were ready to be in a new kind of neighborhood. Melinda, told us, "I don't want to live in a bad environment. . . . I'm tired of living around chaos, I just want to live somewhere quiet where people go to work, go home." Chris explained that she was interested in how opportunity neighborhoods could help her child: "You'll better yourself career wise, people wise. . . . It's fresh air from some of the places the communities are not doing so well. You don't realize it until you get over to a place that's so great and then you go back and it's actually really bad. . . . I just want to raise my kid to succeed."

The conversations families had with Navigators about the opportunity areas helped families visualize how moves to such areas would really happen. Topics that came up included transportation to work, parents' interest in returning to school, proximity to grocery stores, medical centers and afterschool activities for their children. As Odyssey explained, "The most helpful thing about the CMTO is that they make you comfortable with the idea of doing something new. . . . not only do they give you the resources, not only do they give you the reassurance, but they also give you like a roadmap to how and why it can't fail. Just try it. So it's like it gives—it kind of clicks in your brain to try something new."

Jackie, a White mother who moved to Issaquah with her son, told us, "I don't know why it was so scary for me to open up outside of this little community, even though that's where I wanted to go. . . . It was just some resistance to things that now that I look back were kind of dumb [laugh]." Princess, a Black mother, explained, "[the Navigator] gave me like an idea, made me open my eyes to see what else is out there. . . . She made me think about being okay with just being right here in this neighborhood and you know made me expand. I've never been out there until I met her really. I'm from here and yeah, it was a wonderful neighborhood, the bus lines, the community, everything really. . . . It was good." Deanne, a mother of four, proudly said that CMTO "helped boost my confi-

dence . . . and squash my fears of moving to a better place.”

Increasing Confidence in Communication with Landlords

Another important element of housing search preparation that the Navigators worked on with families was supporting interactions with landlords in opportunity areas. Navigators helped families script their upcoming conversations with landlords, a source of anxiety for many, and helped them create a “rental resume,” a document families could use to present themselves to landlords. These narratives often helped families explain the circumstances that led to their previous housing barriers, such as poor credit histories, evictions, or unemployment. After putting their rental resumes together, some families felt empowered, confident, and less ashamed when interacting with landlords. The resumes also allowed the Navigators to better advocate for families in their conversations with prospective landlords. Peter felt that the resume helped him feel prepared to apply for housing, “having that pre-resume ready, so like my ducks in order, okay this is my income, this is who I work for . . . doing so in advance, I was like ready.”

Lee, a mixed-race mother, said this aspect of the program was helpful because “it’s nice because you don’t get all tongue-tied and all nervous. . . . it makes me feel confident speaking with the apartment like you know what you’re doing.” Sarina described the rental resume:

It doesn’t make me feel embarrassed by the information it makes me feel like, I have got some ammunition for how to attack this and explain it to them and I think that because I’m presenting it ahead of time right? Like I’m not trying to . . . hide it, it also lets them know that I know this was a challenge but I also know that it’s not going to be a challenge anymore because of these things. . . . So, it gives me a different level of confidence. . . . I would say like on a scale of one to ten I probably feel like an eight, nine now. I think before talking to [Navigator] it would have been like a six, seven just because there are some things on my credit report that might be negatives but I feel like she has had me present it in a

way that they are like blips on the radar instead of being the whole picture.

Families found that the Navigators’ role in coaching them on how to approach conversations with landlords was crucial to their success in securing a rental unit. This was particularly true for voucher holders whose primary language was not English. As Lou, a single mother from Eritrea, explained, “In terms of finding the people whose English is their second language like me they need help how to communicate. What to say, what to do, they even told us when you’re going to the landlord, what to dress, how to present yourself, so who teach you that [apart from the Navigators]?”

Respondents described previous interactions with landlords who were hesitant to lease to voucher recipients, often on the basis of preconceived notions. As Bailey explained, “I feel like people see a voucher and they automatically think, ‘Oh, they’re ghetto. . . . They’re gonna trash my place. They don’t care because they don’t have to pay.’” CMTO helped Bailey “show [landlords] a different way just from this rental resume. That means, I took time out to put something together. You know, if I’m gonna do that, I’m definitely not gonna—you know, I’m hoping they look at me in a different way like, ‘Oh. Well, she’s got her stuff together. You know, maybe we can give a shot on her,’ and just maybe hopefully pleading my case.”

DISCUSSION

CMTO increased the rate of moves to opportunity areas and improved neighborhood quality not only because it provided financial and informational resources but also because of the emotional and social aspects of the program design and implementation that reduced the psychological costs—in particular fear of failure—that families faced during housing searches in opportunity neighborhoods. Navigators customized program resources for individual household goals and needs, and communicated with families in accessible, collaborative, and pertinent ways. Participants felt supported, cared for, and like partners in the housing search process. By reducing these psychological and related costs, Navigators increased families’ sense of agency, leading them

to expect more from their housing search and to be better prepared to overcome the heightened challenges of searching in an opportunity area. Through both the specific resources and the nature of the service delivery, CMTO alleviated administrative burdens at many levels to promote broader residential searches and maximize the chance of moves to preferred areas.

The Navigators' high-quality communication and its corresponding effect on families' perceptions of the program and their likelihood of a successful opportunity move were paramount to CMTO's effectiveness. Financial assistance and brokering would not have been as effective but for the Navigators' high-quality communication. These results are consistent with findings from phase 2 of the CMTO experiment, which tested the full CMTO treatment from phase 1, against two slimmed down treatment bundles—one including just financial assistance plus information and one including lighter-touch services and shallower financial assistance—and a control group. The phase 2 estimates of much more modest impacts on opportunity-area lease rates from financial assistance plus information alone, or from the lighter-touch intervention, indicate the key role of higher-touch access to the Navigators in the success of the full CMTO treatment bundle (Bergman et al. 2023). Overcoming administrative burdens to provide HCV participants with much greater residential choice requires a comprehensive, family-centered, and customized approach that squarely addresses psychological costs that can also serve as a basis for lowering learning and compliance costs.

Not every family had the same need and thus not every family leveraged CMTO in the same way. Nearly 40 percent of the treatment group families moved to non-opportunity areas (Bergman et al. 2023). A small number still had enough difficulty moving that their vouchers expired, and an even smaller number leased in their current unit. Most of these alternative movers worked with CMTO Navigators and described feeling similar kinds of support to that received by those who moved to opportunity areas, but decided that moving to a different community was a better fit for their families (DeLuca, Boselovic, and Sausedo 2021). Some

alternative movers indicated that other, non-opportunity neighborhoods were closer to social networks, existing schools, or other amenities that they perceived outweighed the benefits of an opportunity move.

In particular, Black families moved to opportunity areas at lower rates than families from other racial-ethnic groups (Bergman et al. 2023). The experimental effect was still quite large for Black (non-Hispanic) families—CMTO treatment increasing the opportunity move rate by 37 percentage points from 11 percent in the control group to 48 percent in the treatment group—but the mechanisms underlying their lower overall rate of opportunity moves rates merit a closer look, which we are doing in another article (DeLuca, Boselovic, and Sausedo 2021). Black families might be more likely to experience landlord discrimination and limited access to credit. It may also be that Black families were not comfortable with the prospect of moving to majority-White opportunity areas, anticipating that they or their children would be more likely to experience racist interactions. To explore this, we looked to the CMTO baseline survey, and when asked “How would you feel about moving to a neighborhood where almost of the other residents are of a different race or ethnicity than your own?” more than 70 percent of Black families responded “very good” or “good”—exactly the same proportion as White families did. Further, our interviews with Black families revealed that the perceived benefit of the moves to opportunity areas outweighed any perceived downsides (DeLuca, Boselovic, and Sausedo 2021). Yet a small group of Black families (11 total, 17.5 percent of Black families in our qualitative sample) mentioned concerns about the demographic make-up of some majority-White opportunity areas. A few of these Black families said they wanted to ensure neighborhood and school diversity where they lived, and expressed concerns about experiencing racism, which led them to avoid certain opportunity areas. Such concerns point to the importance of Navigator support to ensure that families' housing searches included residential options that felt comfortable and valuable to them. It also indicates a need for further research to understand more about how Black families' experiences of

opportunity neighborhoods compare to White and other families’ experiences across U.S. housing markets and policy contexts.

Navigators were able to increase participants’ confidence, optimism, and sense of agency related to the CMTO housing search. Could these effects persist beyond the initial move and improve future housing searches? Might CMTO have positive spillover effects into other dimensions of participants’ lives, such as education and job searches? It is possible that because CMTO not only removed hurdles but also provided tools that increased resilience and responsiveness in the face of challenges, the program could have had lasting effects on how participants approach other barriers. This is an important area for further research.

In a similar vein, the success of the CMTO program leaves open the question of how its approach generalizes to other settings. Navigators’ high-quality communication and services matter enormously for overcoming administrative barriers woven into the HCV program, and that are heightened in opportunity area searches. The social service agency and staff hired for CMTO had a blend of social service experience as well as real estate and landlord engagement experience. CMTO emphasized, in both its recruitment and training processes, that Navigators had to be effective in working with both families and landlords and that their support for both groups was critical for achieving program aims. The CMTO program was also structured in a way that gave a significant flexibility and discretion to each Navigator. Research is needed on how service bundles may be tailored to local community needs as well as how to best scale services without losing the core elements in the Navigators’ personalized approach that families found to be so effective.

CONCLUSION

Scholars have long shown that even though the HCV program and other federal housing policies can provide relief to rent-burdened households, they can also constrain the residential opportunities of poor and minority families, in part because they operate in racially and economically stratified housing markets, and in part because of some aspects of their designs (Collinson, Ellen, and Ludwig 2016; DeLuca,

Garboden, and Rosenblatt 2013; Hirsch 1983; Rothstein 2017; Taylor 2019). The CMTO study was borne not only out of this research, but also out of growing evidence that neighborhoods matter for child outcomes, and that low-income families face many barriers to taking advantage of housing assistance programs and moving to preferred neighborhoods (Bergman et al. 2023; Cunningham et al. 2018). The HCV program has the potential to increase neighborhood quality and residential choice but falls short of meeting this goal for many families. In this article, we describe some of the psychological costs that HCV recipients bear and show how the CMTO program reduced many of these costs and other administrative burdens to dramatically increase residential opportunity.

Our work heeds a call by Janet Currie (2006) and others to experiment with removing factors that inhibit program take-up for eligible households. Beyond attention to low-touch nudge interventions to increase salience and awareness of eligibility to reduce psychological costs (Bhargava and Manoli 2015), we join a growing literature that shows it may be vital to pair information and financial resources with committed Navigator staff experienced in understanding barriers that low-income families may face and who can provide the emotional support needed to relate to families, boost their confidence, reduce anxiety, and increase their sense of dignity (Herd and Moynihan 2018; Hahn et al. 2018). Recent evaluations of higher-education interventions for low-income students and labor-market interventions for disadvantaged youth and adults demonstrate that programs with dedicated staff and wraparound services tend to be more successful in increasing educational attainment and persistently increasing earnings than information-only interventions (Katz et al. 2022; Dawson, Kearney, and Sullivan 2020; Oreopoulos and Petronijevic 2019; on the importance of third-party navigators, see Herd and Moynihan 2018; on the importance of empowering practices in child support administration, see Hahn et al. 2018). In the health-care domain, home visiting programs have shown that customized, intensive, high-quality services delivered by well-trained staff can improve maternal health and child development (Michalopoulos et al. 2017).

The supportive combination of personalized assistance from navigators, information, and financial resources to reduce barriers to effective social program use is likely to be particularly important for low-income families, especially families of color, given the difficult experiences many have endured not only in their personal lives but in interactions with social service agencies (Lipsky 1980; Soss, Fording, and Schram 2011). Their residential histories and many competing demands on their time and cognitive bandwidth are factors that make the burden of housing search even heavier and more likely to result in suboptimal outcomes (Bertrand, Mullainathan, and Shafir 2004; Christensen et al. 2020). Many families who participated in CMTO reported a history of trauma, abuse, and instability—all of which not only affected their well-being and housing security, but also diminished their optimism

and narrowed their sense of what was possible. They described demoralizing experiences trying to communicate with landlords, and repeated application denials as a result of their credit histories, low incomes, and evictions. Therefore, their CMTO experiences of being brought in and asked what they wanted in their housing, being listened to and offered meaningful help to get there, and the Navigators' "being there" for questions and encouragement throughout the process were profoundly important for helping families find housing in higher opportunity areas. By effectively removing these psychological and related costs, Navigators were able to support families' sense of agency in their housing search, broaden their geographic choices, and ultimately support families to glean as much benefit from the golden ticket of an HCV opportunity as possible.

Table A.1. Qualitative Study Sampling and Response Rates

	Treatment (1)	Control (2)	Total <i>N</i> (3)	<i>N</i> Target Sample (4)	<i>N</i> Number Contacted (5)
A. Sampling targets					
Still searching (as of April 2019)	71 (100%)	24 (25%)	95		
Leased	78 (50%)	29 (20%)	107		
Total targeted	149 (67%)	53 (25%)	202		
B. Recruitment					
Interviewed	119	42	161	80%	85%
Refusals	13	4	17	8%	9%
Contact, no interview yet	9	2	11	5%	
No contact, bad contact info.	8	5	13	6%	
C. Response rate by treatment status					
<i>N</i> interviews, target sample size	80%	79%			

Source: Authors' tabulation.

Note: This table shows the sampling scheme and response rates for the qualitative study sample. Panel A shows the number and percentage of participants who were randomly targeted for participation in the qualitative study from each group, based on their treatment status and lease-up status as of April 15, 2019, for the Seattle Housing Authority and April 23, 2019, in the King County Housing Authority. Panel B shows the number of households who were able to successfully interview within this group; the number who refused; and the number whom we attempted to contact but were not yet able to interview or reach. Column 4 shows the number of households in each of these categories as a share of all households targeted, and column 5 shows household interviews and refusals as a share of households with whom we had some contact. Panel C shows the percentage of households interviewed as a share of the number of households targeted by treatment group.

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PART VII

Child Welfare

Administrative Burdens in Child Welfare Systems



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MICAL RAZ^{ORCID}, AND ALAN DETTLAFF

Public policy often imposes administrative burdens that constrain people's ability to access benefits and affirmatively exercise fundamental rights. In this article, we extend the administrative burden framework to argue that the state also places burdens on people who have involuntary contact with coercive state institutions, such as the child welfare system. Just as administrative burdens lock "undeserving," marginalized populations out of benefits, administrative burdens also lock such populations into coercive intrusion. Drawing on interview data with system-involved mothers and child welfare caseworkers, we show how parents subject to oversight by child protection authorities must overcome substantial learning, compliance, and psychological costs or risk losing a fundamental right: the right to parent their children. We suggest that the burdens of service provision should be loaded onto governments rather than already strained and resource-deprived families.

Keywords: family inequality, child welfare system, administrative burdens, racism, low-income mothers

Public policy often involves onerous administrative processes that place disproportionate burdens on the poor, on immigrants, and on Black and Indigenous people. Research conceptualizes these administrative burdens as constraining the ability of the public to access benefits and affirmatively exercise fundamental rights (Herd and Moynihan 2018). In this article, we extend the administrative burden

framework to show how the state also places burdens on people who have involuntary contact with coercive state institutions. As we show using the case of state child protection systems, administrative burdens in social control institutions that are rights-depriving, rather than institutions that are nominally benefits or rights-granting, have important social, economic, and political implications. We show

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that parents overseen by state child welfare agencies face considerable burdens to retain custody of their children and are routinely forced to navigate complex, confusing, and often inconsistent bureaucratic and legal processes with little assistance. In this way, administrative burdens often facilitate the punishment and dissolution of low-income families of color.

To illustrate the scope of administrative burdens in child welfare, we draw on examples from two separate qualitative studies: first are interviews with thirty-seven low-income mothers in Rhode Island who had open child welfare cases, along with ethnographic observations with some of these mothers; second are interviews with sixteen frontline child welfare case-workers conducting investigations in Los Angeles and Las Vegas. These data provide insight into administrative burdens on parents with child welfare cases, demonstrating that, as in other policy domains, these burdens involve substantial learning costs, onerous compliance costs, and profound psychological costs that reinforce the marginalization of low-income families of color.

Unlike vital welfare state benefits such as the Supplemental Nutrition Assistance Program (SNAP), Medicaid, or Temporary Assistance for Needy Families (TANF), the services child protection agencies require of parents (such as parenting skills classes, home visits, or substance use monitoring and treatment) are applied coercively, with compliance enforced by the threat of family separation or dissolution (Dettlaff and Boyd 2020; Elliott 2021; Paik 2021; Roberts 2008, 2022). Nevertheless, as we show, parents face considerable burdens in navigating these services. This suggests that though in some cases burdens may be designed to restrict enrollment and accessibility of programs, in others they are expansively applied to marginalized populations with severe consequences for noncompliance (Ongongi 2012). Administrative burdens differentially function to lock intersectionally marginalized groups out of access to the benefits and rights of liberal-democratic societies while locking marginalized groups into coercive state systems of surveillance and social control (Soss and Weaver 2017; Fong 2020).

We discuss the consequences of these burdens for the relationship between families and the state. Administrative burdens, we argue, not only magnify inequality by forestalling redistribution and the exercise of key rights by marginalized groups, but also exacerbate social and racial inequalities in punishment and social control. These coercive institutions also exhibit a burden asymmetry. State and nonstate agencies coordinate with each other relatively smoothly for the application of social control, that is, through mandated reporting or compliance monitoring, but with opacity, hostility, and suspicion when interacting with subjects of intervention. The application of burdens for system exit in the child protection context is not a question of administrative capacity. Instead, it is a political choice (Roberts 2022).

Administrative burdens are thus a key component of contemporary punitive and racialized poverty governance. In conclusion, we discuss how theories of racialized carceral citizenship and governance (Miller and Stuart 2017; Soss and Weaver 2017) intersect with empirical and theoretical research on administrative burdens.

ADMINISTRATIVE BURDENS, SURVEILLANCE, AND PUNISHMENT

Administrative burdens are onerous costs that subjects experience in their interactions with government agencies. Pamela Herd and Donald Moynihan suggest that these burdens take three distinct forms: learning costs, psychological costs, and compliance costs. Intentionally or inadvertently, these costs make access to state benefits like Social Security and Medicaid more difficult (Herd and Moynihan 2018; Moynihan, Herd, and Harvey 2015). As a result, fewer individuals access these benefits than are eligible, often undermining stated policy goals. The administrative burdens framework shows us how policy design and implementation can hinder access to valuable programs and, coupled with federalism and anti-Black and anti-immigrant racial politics, exacerbate existing racial inequalities in a variety of domains (Michener 2018).

Even though administrative burdens are pervasive in the implementation of most U.S. social policy systems and many other rights-

enabling government bureaucracies, they are also routinely encountered by subjects navigating bureaucracies administering surveillance, punishment, and social control. We argue that the administrative burdens framework can be usefully extended to clarify how burdens serve to lock people not only out of accessing benefits to which they are entitled, but also into long-term involvement with punitive state agencies. These burdens have direct implications for social stratification.

BURDENS IN COERCIVE WELFARE INSTITUTIONS

Research has established the harmful impacts of administrative burdens in both beneficent (Herd and Moynihan 2018; Michener 2018; Paik 2021) and punitive state institutions (Kirk, Fernandes, and Friedman 2020; Phelps and Ruhland 2021). A deep literature describes the profound set of exclusions and burdens imposed through “carceral citizenship” (Miller 2021; Miller and Stuart 2017; Weaver and Lerman 2010). Here, we suggest that burdens are similarly pervasive in coercive welfare institutions, such as child protection systems, that constitute a key part of broader social policy regimes (Edwards 2016). Unlike in typical welfare state agencies, administrative burdens in child protection systems often do not limit access. Instead, as in typical carceral systems, they often enhance punishment and surveillance and make system exit difficult or impossible (Fernandez-Kelly 2015; Lee 2016; Paik 2021).

U.S. welfare systems have long been designed with restrictive eligibility criteria. Restrictive programs generate substantial stigma for seeking out and receiving benefits by design, acting as a buttress for the low-wage labor market (Bonnet 2019; Piven and Cloward 1993). These requirements have long been accompanied by invasive behavioral rules and accompanying surveillance that implicitly and explicitly identify pathological behavior of the poor themselves as fundamental causes of poverty (Gordon 1998). U.S. social policy routinely relies on individualizing frameworks that blame the moral failures of marginalized groups for deep structural inequalities. These individualizing approaches to social problems implicitly and explicitly endorse burdens as a policymaking

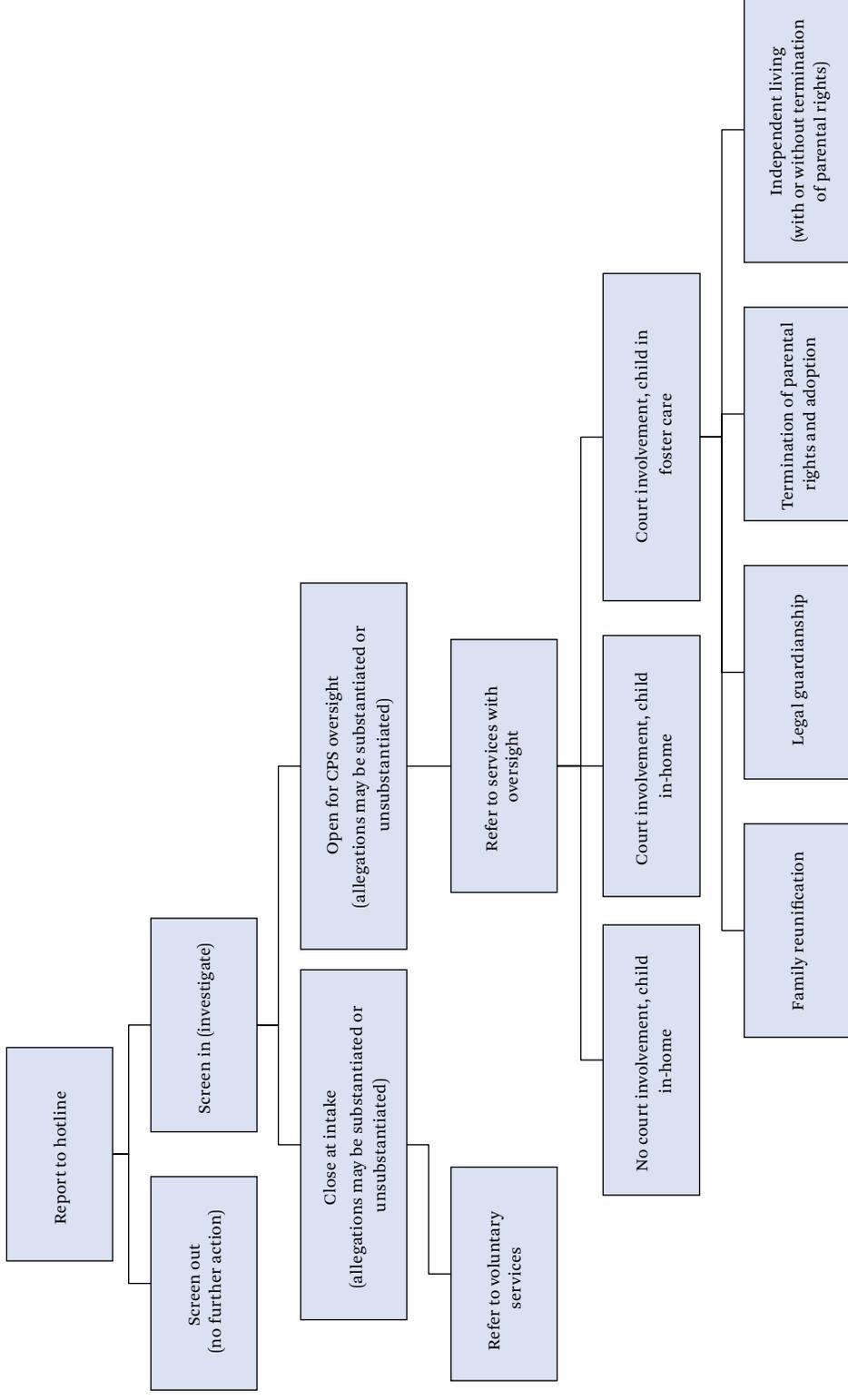
priority. Behavioral conditions for benefits eligibility (such as “man-in-the-house” rules, work requirements, parenting classes, drug screening) coupled with heavy-handed reporting and surveillance practices have been a feature of U.S. welfare systems throughout the twentieth and twenty-first centuries (Hartman 2019; Raz 2013; Soss, Fording, and Schram 2011). These practices of surveillance and regulation that manifest as administrative burdens have been historically grounded in anti-Black and heteronormative standards of an ideal White middle-class family (Abramovitz 1988; Hartman 2019; Katz 1996; Raz 2020).

THE TRAJECTORY OF A CHILD PROTECTION CASE

When the state launches a child protection investigation, parents confront a high-stakes and ambiguous procedure that could result in the loss of their children. A case is opened following a report to a state hotline for suspected child maltreatment, typically neglect rather than abuse. These reports are usually filed by professionals who have routine contact with poor children and families, such as teachers, police, doctors, nurses, and social workers (Krase 2013). If the report is deemed credible by the child protection agency, a caseworker is assigned to conduct an investigation and screening of the family. The potential trajectory of a child protection case is presented in figure 1.

During this process, the caseworker evaluates the physical condition of the family’s place of residence, interviews and observes adults and children in the household, seeks information from allied organizations such as schools, police, and medical providers, and makes a determination about the safety of children in the household. A caseworker who believes children to be in imminent risk of harm is empowered to remove them from the home for placement into foster care. At the conclusion of the investigation, the agency decides whether to keep the case open for ongoing oversight, in which children may remain at home or be placed out of home. Caseworkers can also recommend a wide range of services to families, including but not limited to substance abuse treatment, parenting classes, psychiatric or psychological

Figure 1. Decision Points and Case Processing in Child Protection Cases



Source: Authors' tabulation

treatment, and emergency housing services. Compliance with recommended services may be a condition for parents' continued custody of their children (or reunification if children have been removed). These decisions are made under the jurisdiction of family courts. Periodic hearings review and adjudicate the disposition of the investigation (maltreatment confirmed or not confirmed), the decision to remove children from the home, parents' compliance with recommended services, and the potential termination of parental rights. Policies and procedures vary across states, and in some states can vary across counties.

THE RACIAL AND CLASS COMPOSITION OF CHILD PROTECTION CASELOADS

Family policing is deeply embedded in U.S. government policy systems that interact with Black, Indigenous, poor, and immigrant families (Briggs 2021; Fong 2020; Roberts 2022). The population of families that are subjected to involvement with the child welfare system is overwhelmingly poor (Berger and Waldfogel 2011; Cancian, Yang, and Slack 2013; Fong 2019b; Pelton 2015; Wildeman and Waldfogel 2014) and disproportionately Black and Indigenous (Beardall and Edwards 2021; Dettlaff and Boyd 2020; Kim et al. 2016; Roberts 2002; Yi, Edwards, and Wildeman 2020). More than half of Black children can expect to experience a Child Protective Services (CPS) investigation before age eighteen at pre-pandemic rates relative to 28 percent of White children (Kim et al. 2016). In some counties, about 60 percent of Black children are likely to be investigated before age eighteen (Edwards et al. 2021). Approximately one in three Indigenous infants in Alaska and Minnesota are investigated before their first birthday (Edwards, Rocha Beardall, and Curtis 2021). In many Black and Indigenous communities, being investigated by a child protection agency has become a routine part of childhood.

American Indian, Alaska Native, and Black children are also subject to exceptionally high levels of foster care placement. About 11 percent of Indigenous children and 9 percent of Black children can expect to enter foster care before their eighteenth birthday if rates of foster care placement remained stable at pre-

pandemic levels (Yi, Edwards, and Wildeman 2020). Both Black and Native children are far more likely than their White peers to experience family separation through the foster care system (Dettlaff et al. 2020; Roberts 2022).

These ongoing patterns of inequality follow long racist and settler colonial histories of the separation of Black, Native, and immigrant children from their families (Gordon 2001; Jacobs 2014; Roberts 2012, 2022; Edwards, Rocha Beardall, and Curtis 2021; Simmons 2020). The commodification, regulation, and exploitation of Black reproduction and family life was central to U.S. chattel slavery regimes (Roberts 1997, 2022), and Black children and families have long been subjected to malign neglect, hyper-surveillance, and criminalization from U.S. social policy systems (Murakawa 2014; Quadagno 1994; Simmons 2020; Soss, Fording, and Schram 2011). American Indian, Alaska Native, and Native Hawaiian families were subjected to genocidal regimes of forced separation and assimilation through both government-run and Christian boarding schools and mass fostering and adoption throughout the nineteenth and twentieth centuries (Adams 1995; Beardall and Edwards 2021; Jacobs 2009, 2014; Newland 2022). Contemporary family policing systems both inherit and continue this long legacy of destabilizing Black and Indigenous families as formal U.S. social policy.

As a feature of the structural racism that both drives and is exemplified by these deep inequalities in exposure to child welfare systems (Boyd 2014; Dettlaff and Boyd 2020; Roberts 2002), administrative burdens applied by child protection agencies to families add a distinctive layer of hardship and oppression on families already subject to multiple forms of disadvantage and racism. Inequality in child welfare case composition across lines of class, race, and indigeneity means that the administrative burdens resulting from a CPS case are unevenly applied across families, layering additional burdens and hardships on already marginalized and disadvantaged families of color.

DATA AND METHODS

To examine administrative burdens in child welfare, we analyze data from two separate in-

interview studies: one of low-income mothers in Providence, Rhode Island (conducted by Kelley Fong) and another of CPS caseworkers in Los Angeles, California and Las Vegas, Nevada (conducted by Victoria Copeland). These sites were selected based on the researchers' locations and organizational contacts at the time of data collection. Fong (2019a) and Copeland (2021) had each analyzed their data separately for other studies, and in conversation with the other authors of this article, decided to reanalyze the data with an eye toward administrative burdens, as Herd and Moynihan (2018) theorize, which inductive analyses suggested as a recurring theme.

The first study consists of in-depth, narrative interviews with low-income mothers in Providence because child welfare systems primarily intervene with low-income mothers. Beginning in 2015, Fong recruited SNAP-eligible mothers to the research via flyers, community or organizational encounters, and referrals from previous participants. Participants were not recruited based on CPS experience, so for this article, we examine a subsample of ninety-four interviews with thirty-seven mothers who had open CPS cases at some point before or at the time of the interview. (Fong interviewed an additional forty-six mothers who did not discuss an open CPS case during the interview.) Participants completed audio-recorded, transcribed interviews about their life histories and their experiences with social services, including CPS, typically lasting around two hours in their homes. Most relevant for the analysis, the interviews asked those with CPS experience to "tell . . . the whole story from start to finish," including probes for the services they received and their perceptions of social workers, court officials, and service providers. Of the thirty-seven interviewees, eighteen identified as White, ten as Hispanic-Latina, seven as Black, one as Native American, and one as multiracial. Fong continued following up with some of these mothers in the next few years, conducting follow-up interviews with twenty-eight of the thirty-seven. Most of those not reinterviewed, six of nine, were White. The study also included informal ethnographic observations with fourteen mothers, in which the researcher, Fong, accompanied them to court or to meetings with

caseworkers or other service providers. These observations supplemented the rich interview narratives by providing insight into the dynamics mothers described as well as jumping-off points for later conversations.

In addition to the interviews with mothers, we draw on eighteen interviews with sixteen CPS caseworkers in Los Angeles and Las Vegas. These participants were required to have worked as an investigative or emergency response caseworker within their respective county child welfare department. Emergency response caseworkers are responsible for investigating reports of abuse or neglect once a case is referred by the CPS hotline. Copeland conducted interviews, ranging from one to two hours each, by Zoom or telephone. The semi-structured interview guide asked caseworkers to discuss cases on their caseload as well as their decision-making processes. Two caseworkers were reinterviewed to obtain additional, follow-up information. Seven caseworkers worked within the system for five or more years, three worked in the system for three years, and six did not disclose their time working within the system. In regard to race and ethnicity, five identified as Hispanic or Latinx, four as African American, one as White, and one as multiracial; five identities were not disclosed.

We used Herd and Moynihan's (2018) framework for administrative burdens to analyze the full set of caseworker interviews and the portion of mothers' interviews covering their open CPS cases. We read through transcripts to examine how our research participants discussed learning, compliance, and psychological costs in CPS. We then reviewed excerpts within each category to inductively identify themes within each type of cost, that is, what form these burdens take for parents with open CPS cases. We draw on our analysis to trace the contours of administrative burdens in child welfare. That mothers and caseworkers in different geographic regions discuss similar processes suggests that such burdens are recognized by stakeholders with different vantage points and in distinct policy contexts. CPS-affected mothers across race-ethnicity described these burdens and the challenges they faced in overcoming them. We do not suggest that burdens take

exactly this form in every child welfare system across the country, nor that all parents subject to child welfare intervention experience burdens in this way. Instead, we use the interviews to illustrate how learning, compliance, and psychological costs manifest in a rights-depriving institution like the child welfare system, one that has enormous power over families.

FINDINGS

Unlike typical welfare state programs, involvement in the child protection system is almost always involuntary. Because of this, the administrative burdens imposed by the various agencies involved in CPS cases function in different ways. Rather than deter the delivery of needed services or benefits, administrative burdens in coercive and involuntary systems serve to make punishment and coercive intervention more likely. In the case of child protection, administrative burdens make it more difficult for parents to forestall negative case outcomes, like substantiated maltreatment findings, child removal, and termination of parental rights. Following Herd and Moynihan (2018), we identify learning, compliance, and psychological costs in child welfare that impose substantial administrative burdens.

LEARNING COSTS

Parents encountering a CPS investigation must rapidly learn the legal and administrative processes that will determine the fate of their children. Their understandings of formal child protection agency processes depend heavily on caseworkers, attorneys, and court officials. Despite relatively stable bureaucratic procedures for case processing, parents are often poorly informed about these procedures. To avoid punitive case outcomes, parents thus face substantial learning costs: they must learn the formal process they are now involuntarily enmeshed in, as well as learn the discretionary, sometimes unstated standards of their assigned caseworker or caseworkers, service providers, and court officials who will make judgments about the safety of their children and their fitness as parents. Features of child protection bureaucracies, such as high caseloads and high turnover of CPS staff (Edwards and Wildeman 2018), magnify these learning costs.

In interviews, mothers emphasized that they did not understand the process or the plan for their cases, so even when they fully planned to cooperate and fulfill all of CPS's requirements, they were unable to do so. They felt they were kept in the dark as to why children were removed, why certain interventions were taken, and what was needed to reunify. As one mother, Amy, noted the week after her four daughters were removed suddenly from her care following a domestic violence incident: "I feel like they're not telling me everything. Like I told my worker again, 'When can we sit down and talk about the things I need? I mean, there's a lot that needs to be done, right? How long will this take?'" Her caseworker had just called her for the first time the day before; she hoped to have a visit the next day. "Then she said that after that, we'll schedule a meeting for me to go in for that, for a reunification plan." Likewise, a mother named Isabela commented,

CPS didn't tell me all the nooks and crannies. They didn't tell me what it was that they didn't like or what they didn't want me to do. 'Cause I would tell them, "What is [it] that you want me to do?" At one point, everybody's telling me, "Oh, your boyfriend. Just stay away from him. They don't want you with [him]." I would bring it up to them. "Do you not want me with this person?" They would not say nothing. They would be like, "Oh, no. It's not that. Like, we didn't say that." It's pretty much, they're trying to set you up to fail.

Isabela described getting conflicting and insufficient information from CPS authorities, such that she felt "set up," with CPS instituting requirements she felt were not communicated clearly to her. These learning costs made it difficult for parents like Isabela to understand what they needed to do to comply with CPS. This confusion might subsequently result in a caseworker describing a parent as being uncooperative or resistant.

These learning costs are not solely the perception of parents. Caseworkers in interviews noted that they were also responsible for assisting the same families in navigating the system. As one caseworker, Sarah, noted, "It always seems like the system is just trying to push it

down instead of helping you to get up. And I think it really depends on that worker to really help the families navigate the system.” This kind of assistance in navigating the system depends on routine and regular availability of agency professionals. In a context of high case-loads and high turnover (Edwards and Wildeman 2018), caseworkers do not always provide the information parents need. Availability of services, which can vary greatly by jurisdiction, can further affect the information caseworkers provide to parents, as well as the decisions caseworkers make regarding the need for placement of children (Graham et al. 2015). Caseworkers may also be unable or disinclined to communicate CPS’s concerns or requirements to families. Sarah recalled a recent investigation in which the mother “barely spoke English.” Although Sarah tried to explain why CPS was there—“there’s safety hazards. . . . you can’t have a kid sleeping on this floor”—Sarah said that this mother “didn’t understand why” and “didn’t really have a chance to really digest it,” perhaps due to language or cultural barriers. Sarah described the consequences of these learning costs: after a week or two, “we had already decided she ain’t gonna participate, she ain’t gonna change her mind, [so] do what we got to do type of thing.” Michael, another caseworker, reflected, “I think a lot of times, especially with the older generation of workers . . . they’re tired, and they want to do the minimum: ‘So here’s the list of referrals. Good luck.’” Caseworkers and other CPS officials are the conduits of information to parents—essential information about what they need to do to reunify with their children or close their cases—yet they acknowledge they are not always able to provide this information effectively.

For cases involving court intervention, parents’ attorneys are also in a position to provide critical information to parents. In Rhode Island, where we interviewed mothers, parents with CPS cases receive an attorney in court proceedings; generally they are represented by a legal aid attorney if they do not have the resources to hire a private attorney. In theory, this attorney is the one official specifically tasked with advancing parents’ interests. Yet this relationship often failed to provide parents with

the information they needed as well. Mothers highlighted how difficult it was to talk to a lawyer and receive information about the status of their cases. Multiple interviewees noted their frustration with leaving repeated messages for their attorney and not receiving timely responses. As one mother, Barbara, explained, “I literally will call her, callin’ up, blow up her phone, leave her voice message after voice message and she will not get back to me. It’s like, you’re supposed to be my lawyer. You’re supposed to be helping me get my kids back.” Mothers also described challenges in obtaining important documents such as service plans and court reports. In one example, the researcher accompanied Isabela to court. In court, Isabela asked her attorney whether she could see the report that CPS had submitted to the court. At first, the attorney said she did not have a copier. Isabela suggested she could come to the attorney’s office later. The attorney replied that there was nothing interesting in the report anyway. Isabela persisted. Finally, the attorney said her legal aid office did not give court reports to clients. Even though mothers are entitled to review their court reports, which include information about their compliance with agency requests and what else the agency is asking of them, court officials like Isabela’s attorney kept this information from them. Presumably, this might be a way of limiting clients’ access to unfavorable accounts or interpretations of their home life, or perhaps of minimizing confrontation or resistance, but such practices created substantial learning costs for parents.

Mothers also noted that they had to independently ascertain what the caseworkers expected from them and to take action with little guidance; their pleas for assistance were often ignored. After her two daughters were removed, one mother, Desiree, desperately went from hospital to hospital in an attempt to check herself in for “any damn detox” in order to get her children back. She highlighted her frustration, stemming from a lack of information about the process and expectations. “It was just like, tell me to do something. Help me. These are my babies. It was just, give me guidance. Give me a book. Tell me. Give me rules. Tell me to do something. Nothing. I didn’t meet my case-

worker until three weeks into my case.” A process that minimized or eliminated learning costs would immediately provide Desiree with clear information about what she needed to do and with assistance to access the services she needed and wanted. Instead, she was left unclear about how she could get her children home and how she could detoxify. Relatedly, mothers scrambled to find solutions in cases where their lack of housing was taken as an indicator of their unfit parenthood. Yet mothers felt that rather than assisting them in finding housing or resources, caseworkers gave them conflicting information as to what housing might be acceptable and how to access it. One mother, Maggie, described her triumph: “I got myself on that Section 8 list. I got myself my own housing.’ I said, ‘I can’t thank you guys [caseworkers] for anything.” In one poignant interview, another mother, Christina, favorably compared the criminal justice system to the child protection system, as at least in the former, she felt, the expectations were clear and the rules governing the case were explicit.

COMPLIANCE COSTS

Child protection agencies and family courts require parents to participate in services from allied providers, attend visits and court hearings at a specified time and place, and submit to surveillance and monitoring. In the child welfare context, compliance in these activities becomes the way of measuring not only parents’ commitment to their children, but also the extent to which they have “taken responsibility” for the factors that brought them to the attention of the system. This logic dictates that if parents truly care about their children, they will comply with the expectations demanded of them. If for any reason they cannot meet these expectations, they are deemed “noncompliant” or “uncooperative” (Ogongi 2012). The consequences for failing to comply with agency and court directives are often severe: loss of custody of children, delayed reunification with children, or termination of parental rights.

Because child protection systems are organized to maximize efficiency for service providers, agency workers, and court officials, parents incur substantial and asymmetric costs to comply with related requests. These burdens

infringe on other responsibilities, such as caregiving and work. Caseworkers readily acknowledged how compliance with agency requests is often out of reach for parents. As one, Sophie, remarked, “We set families up to fail. . . . We’re gonna tell you you’re a victim of domestic violence. Go to victims’ classes and maybe some parenting classes. And you’re going to have to meet with your social worker once a month. You’re gonna have to do counseling, like individual therapy, and then you’re going to hold your full-time job, so you don’t lose that.” Diana, another caseworker, explained, “Maybe we can go down the route to where we won’t [remove], but we’re going to put all of these efforts in to make it really hard for the client. . . . And when I say really hard, it’s like, thirty-six weeks of DV [domestic violence services], six months of sober living, AA or something like that. . . . We’re kind of really on top of you.” Parents facing co-occurring challenges may indeed need and want support in a number of areas, but these caseworkers emphasize how, in the present system, parents cannot practically access this support—in Sophie’s words, they are set up to fail.

Compliance costs include large amounts of time traveling to often dispersed service provider locations and time at required appointments. Interviewees described how these appointments are conducted during regular business hours, at service providers’ convenience rather than to align with parents’ scheduling needs. Deandra, a mother whose daughter was removed following allegations about Deandra’s mental health needs, said her appointments were “Monday through Friday, always something every day.” In interviews, mothers cited complexity, length of appointments and wait times, lack of access to transportation and lengthy travel times in complex public transport systems as barriers to their compliance. Desiree recounted recently having to attend an appointment with a mental health provider in another city at 8 a.m. To get there, she needed to walk twenty-five minutes to the nearest bus stop and take three buses—a substantial burden of her compliance.

Mothers described being sent to fulfill multiple evaluations and programs at various locations. Parents may be required to complete

urine testing, drug treatment, support groups such as Narcotics Anonymous, psychological and psychiatric evaluations, and therapeutic programs. These programs from third-party service providers often last multiple hours, multiple days a week. Compliance with these programs conflicts with other major responsibilities these women have, primarily care for children still in their home, work, and schooling. A mother named Yvonne admitted that she was relieved when her teenage daughter, the oldest of eight, was sent to a juvenile justice facility, because when her daughter was home, CPS was always coming by to “know what’s going on. . . . That stops me from doing stuff for the rest of the kids.” In fact, some mothers noted that these requirements were designed to be burdensome inasmuch as they specifically did not take into account their schedule or availability; instead, mothers were expected to cancel their obligations and clear their schedules to comply with any requirements. Deandra was sent to a substance use treatment program each weekday from 9 a.m. to 1 p.m.; she had previously been attending school during the day. Deandra explained that because of the program requirements, “I had to drop out of school and everything ’cause I had to go there, every day. . . . I had to do so many programs. Constantly getting tested, constantly getting a random drug screen at the frickin’ courthouse. It was just all a mess.”

Additionally, parents described how visitations with children, a highly anticipated event and one also central to compliance from the agency’s perspective, would be arbitrarily scheduled and frequently canceled or rescheduled even after mothers took time off or made their way to appointments, often on public transit. Christina, for instance, had to drive to Providence from her home a half hour away to visit with her son. She said that CPS had been missing visits. One week, she had a visit scheduled for Tuesday that did not occur because Christina said the caseworker was “busy.” They rescheduled for later that week. As Christina waited with the researcher past the time she and her caseworker had agreed upon, Christina expressed frustration that the visits were “on their time, her schedule.” These abrupt scheduling changes often stemmed from staffing

challenges, in a profession that is chronically understaffed and overstretched; however, mothers experienced these changes as a sign of disrespect for their time and understandably felt frustrated. Mothers were not given that same grace when they missed visits. If parents are late or miss multiple visits, visits may be canceled altogether. Without regular visits, CPS can suggest a weakened parent-child bond in court, justifying the termination of parental rights.

In addition, mothers waited for hours at court. In Providence, even those whose cases would not be called until noon were expected to be there at 9 a.m. On several occasions, the researcher waited with parents all morning at court. Mothers had to call out of work, miss scheduled appointments, and arrange child-care; missed court dates would be a strike against them in their cases. Sophie described a recent case where the mother had a “very supportive” family, was “well bonded” with the child, and was going to Alcoholics Anonymous—“like, no concerns, no no no concerns.” Her child was removed, supposedly for “failure to protect” the child from exposure to domestic violence. Sophie recalled the mother telling her, “I’m gonna lose my job because I have to go to all these court proceedings and I’m missing a lot of work and I just started there.’ And she’s just sobbing, like, ‘This is ruining my life.’” Sophie felt this was “not beneficial to the child at all”—all the court proceedings, scheduled for the convenience of court officials, just made it more difficult for this mother to provide for and reunify with her child.

The complex bureaucratic processes and paperwork to be completed for each agency involved in a case also creates substantial additional time costs for parents. A mother named Melanie was trying to secure housing in her effort to reunify with her children, but had faced numerous challenges finding an apartment and leasing up. Every place she called was full, with “like a year’s waiting list.” One transitional housing program was a possibility, but Melanie had found it “very hard” to get in: “They want all kinds of paperwork. Some of it I can’t get.” But Melanie did not receive help from CPS to meet these requirements. As she described it, “I was having a lot of trouble. That’s why I

asked CPS to help me. [mimicking CPS's response] 'Oh, you're not working hard enough. You're not looking hard enough.' Me and my sister called literally everywhere in the state of Rhode Island. No help. No help." As Melanie needed housing to reunify with her children, her difficulties obtaining it constituted substantial compliance costs.

In addition to the time spent complying with agency or court case plans, CPS cases often incur financial costs, primarily associated with either travel or service provision. Agencies may require parents to move into new apartments caseworkers deem to be more appropriate for children, involving additional costs for moving and rent. Drug testing may be required and often incurs a regular fee that at least one mother told us she had to pay out of pocket. Parenting courses and other educational requirements result in additional expenditures. The partner of one mother, Amanda, noted that each parenting class cost \$20, and he was required to take numerous. He recalled his experience: "They want me to do more parenting classes. That's \$120 out of my pocket. How much more money they want me to take out of my pocket?" Extensive time burdens can make maintaining employment or seeking new employment difficult or impossible, and also come with substantial difficulties in seeking or providing childcare for children not in state custody, triggering additional financial hardship. This interaction can result in parents spending money or amassing debt while losing wages from their regular source of income as they reschedule shifts or cut back hours, due to their efforts to comply with onerous requests. The barrier may not even be the requirement itself, such as abstinence from drug use, but rather the cost of proving this compliance. As Barbara noted, "I'm clean and stuff, so I'm getting negative screens, just I haven't been able to do them, 'cause of the money." Some states even impose an extreme compliance cost, garnishing parents' wages through child support to pay for the involuntary "service" of foster care provided to a child (Shapiro 2022).

When children are removed from their homes, parents may lose eligibility for numerous services, including housing. This system failure to coordinate across agencies and ser-

vice providers can create Kafka-esque situations in which child removal results in a parent's being barred from accessing the housing they need to meet the caseworker requirements for reunification. These situations occurred for our interviewees most often through their interactions with family shelters and subsidized housing programs: Parents needed to have physical custody of their children for eligibility, but they also needed to have housing to regain physical custody. Desiree described this paradox succinctly: "I can't get the three-bedroom unless I have my kids. . . . I couldn't get into family shelter without them seeing that I have my kids." Another mother, Melanie, asked incredulously, "You've got my child because of housing, and you can't stick me in a shelter with her?" She added, "I guess I need to have my daughter first to get into a family shelter." Other families made difficult calculations as to which children to bring home first given housing limitations. A mother of four, Candis, explained, "For them to come home, the girls will have to have their own room, and the boys will have to have their own room. We decided the girls would be coming first because they're the smallest ones." Rather than providing housing to parents, housing keeps parents from reunifying, while child removal and placement outside the home—itsself presented as a child welfare service—shuts parents out of housing benefits. Such practices impose a practically insurmountable burden on parents seeking to comply with CPS's housing requirements.

Not bearing these compliance costs is consequential. At every step of interaction with the agency, caseworkers note whether a mother complied with the case plan, whether she was late to an appointment, and how successful she was in completing requirements such as therapeutic groups or parenting courses (Lee 2016; Reich 2005). Thus CPS weighs how parents respond to these burdens in determining foster care placement and reunification. Caseworkers interviewed indicated that parents' refusal of monitoring and testing resulted in further interventions and surveillance. One caseworker, Lara, recalled a mother who declined voluntary drug testing: "Because she kept refusing to test, we started visiting more often, like unannounced visits and things like that, just to see

what was going on.” Lara describes the cycle of compliance costs, in which noncompliance creates additional burdens.

PSYCHOLOGICAL COSTS

Poverty governance in the United States, as in other liberal and neoliberal political and economic contexts, generally pursues service provision on principles of least eligibility (Bonnet 2019; Esping-Andersen 1990; Soss, Fording, and Schram 2011). This approach embraces an individualist framework for explaining the causes of poverty focused on self-improvement and minimizing social and structural explanations. One key component of historical and contemporary poverty governance systems in these contexts is the development of normative standards for *deserving* and *undeserving* categories among the poor (Gordon 1998; Quadagno 1994; Schneider and Ingram 1993). Subjects of state agencies are routinely stigmatized formally and informally through agency procedures and public discourse. In particular, humiliation, shame, and subordination are central to interactions between parents and CPS agencies (Fong 2020, 2022; Lee 2016; Reich 2005). As Jennifer Sykes (2011) shows, mothers seek to preserve their self-identities as good mothers and resist the stigma of abusive or neglectful parenting, yet doing so can negatively affect the trajectory of their cases.

Parents with open child welfare cases bear substantial psychological burdens to get (and keep) their children home with them (Kenny, Barrington, and Green 2015; Nixon, Radtke, and Tutty 2013). These costs compound from learning and compliance costs. Recall Barbara, the mother struggling to reach her lawyer to learn what was going on. The experience of enduring high learning costs left her feeling isolated and powerless. Without any response from the lawyer, Barbara said, “I literally am stuck in a corner with nobody on my side.” Likewise, Amy—scrambling to figure out what to do—felt prematurely judged, saying, “I don’t know what I’m up against. I feel like it’s these unseen forces, because I feel like I’m not being informed. I’m not being informed of what’s really going on. That’s a problem. That’s a major problem, ’cause that’s telling me that me and my household, we’re just being judged.

We’re being judged before they even truly investigate.” Compliance costs, too, create psychological costs. In one example, a mother named Stacy arrived with the researcher at court at 9 a.m., where we sat and waited on courthouse benches until after 2 p.m. “All the CPS workers, they do this to a million fucking parents,” Stacy, reflecting on the wait, muttered to a friend on the phone at one point. After several hours, Stacy said she was “getting aggravated” and would have gone out to smoke a cigarette had she known the judge was on break. Not only did the long wait impose on Stacy’s other responsibilities—she could not make an appointment to pick up needed medication at 11—but it conveyed the system’s disrespect for her and her time.

Parents must also go along with the agency’s framing of deficient parenting, another psychological cost. Many learned to tell CPS what CPS wanted to hear, even as this meant degrading their own motherhood. As one mother, Selena, put it, “If [CPS] say to you, this is blue, you know, you gotta say, yeah, it’s blue. They got the power, and if you don’t work with them, they are gonna be hard to you.” Another mother, Bianca, described the subordination she experienced: “[Caseworkers] feel superior. They feel in power of you, because of the situation. If you don’t comply or like something that they say or how they say it, and you complain about it, that’s it. That’s it. You’re done. You’re done.” When interacting with caseworkers and court officials, Bianca learned to “lie to them—they like that. Tell them they’re the best. Tell them you’re so glad they’re here.” Such experiences constitute a profound psychological burden that child welfare-impacted parents must endure.

More broadly, scholars have highlighted the constant state of fear and alertness parents, and primarily low-income women of color, experience in the child welfare system. This fear can be conceived as a psychological burden, which permeates parents’ lives in various ways (Fong 2019a). The stress mothers experienced from having CPS in their lives helps clarify that it is not experienced as a “service” in the traditional sense of provision of needed resources, but instead as an adversarial interaction with a rights-depriving institution. One mother, Latanya, stated that such interactions with child

protection agencies and the programs they required were “stressful. Stressful, stressful, stressful, stressful. It was stressful going through all of that, because like, you’re just hoping you’re doing everything right, you’re hoping you’re saying the right things and on time.” Yvonne highlighted the constant state of vigilance this engendered. The caseworkers “just come when they want to. They can just pop up at any time. I mean I don’t have nothing to hide anyway, but just the aggravation of knowing that, you know, you got them involved.”

DISCUSSION: INVOLUNTARY SYSTEM INVOLVEMENT AND SOCIAL STRATIFICATION

A vanishingly few number of families choose to interact with child welfare systems. These agencies exercise the power to separate children from their families, and, as we have argued, impose a series of administrative burdens on parents seeking to avoid the removal of their children or reunify with children removed from their custody. These burdens include the challenges of navigating complex bureaucracies with incomplete information and figuring out how to meet the often unstated standards of caseworkers who have substantial discretion to determine case outcomes. They also include the substantial time and financial resources it takes to comply with agency recommendations for often far-flung services, court appointments, child visitations, and other obligations, which are rarely scheduled at the convenience of parents and may disrupt work or other schedules. Finally, parents must endure substantial psychological costs as they interact with a system fundamentally focused on correcting what it deems deficient parenting.

Even beyond the injustice of unnecessary family separation, the costs of these burdens are severe, from lost wages, lost employment, disruption of the parent-child relationship, stress, instability, and loss of eligibility for other services, including housing. The psychological burdens may exacerbate underlying mental illness, resulting in worsening outcomes for parents. Further, research highlights that child removal in itself is a risk factor for

worsening health outcomes for mothers (Kenny 2017). Often these burdens detract from parents’ ability to care for their children, exacerbating the situation the child welfare intervention was ostensibly intended to ameliorate.

Are these burdens intentional or a failure of implementation? We argue that they are a form of gatekeeping by design. Even allowing for the possibility that the courts are unaware of the burdens that their requirements place on parents involved with the child welfare system, providing this information (through a lawyer) does not result in accommodations or changes. Requiring parents to participate in a variety of programs—geographically remote, time-intense, and subject to changing requirements—leads to clearly foreseeable barriers. Deciding to discount the significance of these barriers is, in our interpretation, indistinguishable from embracing the barriers. In this way, these barriers, as Herd and Moynihan (2018) argue, create policy that perhaps otherwise would be unpopular or socially unacceptable. The policy these barriers create is that some families are expendable, with families readily separated and children experiencing the termination of their parents’ rights to parent at astoundingly high rates (Wildeman, Edwards, and Wakefield 2020). In this way, concerns about who and what counts as a family, and what kind of parents, and particularly mothers, “deserve” to raise their children, potentially fraught political questions, are “substituted,” to use the framework of Philip Jenkins (1992), by concerns over the timeliness of completing parenting classes and parents’ compliance with mandated “services” and surveillance. Thus the burdens *are* the policy.

These burdens are applied unevenly across social groups. Because of deep racial inequalities in child welfare system exposure (Kim et al. 2016; Wildeman, Edwards, and Wakefield 2020; Yi, Edwards, and Wildeman 2020), the trauma of family separation and the administrative burdens applied by child welfare agencies are also applied in a distinctly unequal manner. Poor families and families of color are subjected to the administrative burdens imposed by child welfare agencies at exceptionally high rates. The experiences of parents interviewed in this study and described in earlier research

(Fong 2020, 2022; Reich 2005; Roberts 2008) clearly show that interaction with child welfare systems is in and of itself burdensome and costly, even after discounting the potential harms caused to parents and children by family separation.

Because of these costs and their inequitable distribution, these administrative burdens contribute to racist structural inequalities in family life and childhood. Child welfare systems exemplify the racialized and stigmatizing approach to poverty governance in the United States that serves to manage, rather than eradicate, poverty. Here, the implications of the resulting inequalities differ from beneficent welfare state programs; coercive and punitive administrative burdens work to make punishment and marginalization more certain and more severe for poor, Black, and Indigenous families.

Despite recent debates among some quantitative social scientists about the direction of effects of foster care on outcomes for system-involved children (see, for example, Wakefield and Wildeman 2022), these findings show that interactions with CPS impose an array of burdens on families in ways that directly contribute to family and childhood inequality. Regardless of possible marginal effects of foster care placement on later outcomes for individual children, contact with the child welfare system triggers a host of financial, temporal, and psychological costs for families, and in particular for low-income mothers of color. The costs of child welfare system involvement compound with the administrative burdens imposed by related agencies often directly and indirectly involved with child welfare system cases (Paik 2021). Agency contact itself actively expands racialized family inequality through the uneven application of compulsory administrative burdens.

CONCLUSION

Using a lens of burdens to understand the function and practice of the child welfare system in the United States helps clarify how it differs from other forms of service provision and how it should be seen as comparable to other carceral systems. Analyzing the punitive burdens structured within the child welfare system also

offers an opportunity to envision an alternative response to families requiring support: one built on supports rather than suspicion, and on offering assistance to rather than placing burdens on families.

The child welfare system fundamentally differs from other systems designed to provide aid to families in need (such as SNAP, Medicaid, and TANF), as compliance with services provided by child welfare agencies is enforced not by denial of services, but by further expansion of “services” that operate as punishment for the act of noncompliance. When children are forcibly separated from their parents as a consequence of noncompliance, further engagement in services is required as a condition of children being returned and may extend to termination of parental rights if families are unable to meet the burdens placed on them. The punitive application of these services is not an aberration of child welfare practice, but instead an intentional design that places additional burdens on families to demonstrate compliance with a normative, middle-class parenting standard that fails to consider the challenges parents living in poverty face as each subsequent burden is applied. To be eligible, for instance, for SNAP benefits, too often parents face administrative burdens that hinder accessing a valuable and desired service. In the child welfare system, the services are the burdens, whereas the valuable and desired outcome is often simply maintaining the right to one’s child. If child welfare services were designed to assist and uplift parents, undoubtedly barriers would be erected to accessing them. Instead, these services are burdensome and punitive by design.

In contrast to individualizing and burden-driven child protection approaches, abolitionist movements propose that states divest funds from the child welfare system and reinvest them in families and communities to ensure that all children can remain safely at home with their families and communities (Dettlaff et al. 2020; Roberts 2019, 2022). This process also requires the shifting of power from institutions of coercion and social control, such as the child welfare system, to communities. Abolitionist movements advocate building strong systems of support that ensure families can access the

resources in their community that they need to thrive. This includes creating and improving systems of community-based support that provide a child allowance, safe and affordable housing, jobs that pay sustainable wages, mental health services, food, domestic violence supports, and substance use programs. Ultimately, abolitionist movements seek to build communities in which community members intervene to provide support when needed, a sufficient array of supports and interventions are available, and a community system of care can minimize and address harm. In this way, not only are burdens shifted from families to communities, but communities also have the resources they need to absorb these burdens because those resources have been shifted away from coercive systems for the purpose of prioritizing family safety and stability.

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Administrative Burden and the Reproduction of Settler Colonialism: A Case Study of the Indian Child Welfare Act



HANA E. BROWN 

The Indian Child Welfare Act of 1978 (ICWA) sought to end the forced removal of Native children from their tribes. Decades later, American Indian children are still placed in foster and adoptive care at disproportionately high rates. Drawing on forty years of archival data, this study examines the role of administrative burden in reproducing these inequalities and the system of domination from which they arise: settler colonialism. Focusing on three arenas—notice, meeting and hearing involvement, and foster family certification—this article illuminates the burdens imposed on tribal governments that serve as mediating institutions in ICWA implementation. Findings suggest that burdens have particularly strong consequences for inequality when they fall on third-party organizations. They also demonstrate how administrative burden operates as a mechanism for the reproduction of settler-colonial domination.

Keywords: administrative burden, settler colonialism, indigenous, American Indian, Native American, child welfare

The Indian Child Welfare Act (ICWA) of 1978 promised to reduce an entrenched inequality: the disproportionate placement of American Indian children in foster and adoptive care.¹ In the generations before ICWA, state and federal policies forcibly removed 25 to 35 percent of American Indian children from their communities, turning them over to white families and institutions for “assimilation” (Jacobs 2014).

Child removals were part of a broader effort by the U.S. settler state to eradicate tribes and seize indigenous resources (Bruyneel 2007). ICWA established procedures to limit the removal of American Indian children and honor the sovereign right of tribes to govern child welfare cases. Observers have lauded the bill as transformative (Wilkinson 2006). However, in many places, the number of American Indian

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1. I use the term *American Indian* because it most closely approximates the language used in ICWA. I also use terms like Native Nation, Native, tribal, and indigenous to refer to first peoples more generally. Where possible, I use tribal identifiers for individual respondents. This terminology is intended to “reflect the range of words that Indigenous Peoples in the U.S. use to refer to themselves in collective” (Linjean and Weaver 2022, 3).

children in substitute care increased after ICWA, despite a decrease for all other children (Weaver and White 1999). Four decades on, American Indian children are still placed in foster and adoptive care at disproportionately high rates (Wildeman, Edwards, and Wakefield 2019).

Research suggests that these inequalities result from limited caseworker education and weak federal enforcement (Brown 2002; Bussey and Lucero 2013; Casey Family Programs 2015; GAO 2005; Kessel and Robbins 1984). Focusing on individual street-level bureaucrats, these explanations assume that more education and strict penalties for caseworkers will reduce child removals. Shifting attention to policy design, this article illuminates the role of administrative burden in the disproportionate removal of American Indian children. Unlike traditional welfare state programs that serve individuals, ICWA's rights can be triggered only by tribal governments. Drawing on forty years of archival materials from the tribal officials and state agencies charged with ICWA implementation, I identify three arenas in which administrative burden can prevent tribal governments from intervening early to invoke ICWA: responding to notice, attending meetings and hearings, and certifying tribal foster families. In each case, burdens present learning and compliance costs for tribal officials who work with limited infrastructure and in remote areas. These onerous encounters with the state, especially those that risk or result in child removal, also create psychological costs, amplifying the collective trauma that child removals generated pre-ICWA. I further demonstrate that when burdens have limited tribal governments' ability to intervene in child welfare cases, ICWA opponents have used this burden-induced nonintervention to claim that tribes are irresponsible and unable to ensure the safety of their children. These claims have buttressed a nationwide legal effort to overturn ICWA.

These findings suggest that burdens may have particularly strong effects on inequality when they fall on organizations. When implementing organizations primarily or exclusively serve racialized minorities, organizationally targeted burdens can reinforce racial inequality

at the group and individual levels (see Ray 2019). Further, they suggest that burdens operate as a mechanism for the reproduction of settler-colonial domination, limiting the powers of sovereign entities to self-govern.

BURDENS, THIRD PARTIES, AND SETTLER COLONIALISM

Administrative burden refers to "an individual's experience of policy implementation as onerous" (Burden et al. 2012, 742; Herd and Moynihan 2018). Foundational work highlights the learning, compliance, and psychological costs that people face when interacting with the state (Herd and Moynihan 2018). Burdens limit access to public benefits and services (Aiken, Ellen, and Reina 2023, this issue; Barnes 2021; Barnes, Halpern-Meekin, and Hoiting 2023, this issue; Speigman et al. 2013), but people also encounter burdens as they attempt to exercise legal rights (Edwards et al. 2023, this issue; Heinrich 2016; Herd and Moynihan 2018; Moynihan, Gerzina, and Herd 2021; Nisar 2018).

A core feature of burdens is that they are unequally targeted and experienced (Barnes 2021; Herd and Moynihan 2018; Masood and Nisar 2021; Ray, Herd, and Moynihan 2022). Populations with less power, fewer resources, and less human and social capital may be unable to overcome burdens to gain available public benefits (Christensen et al. 2020; Heinrich 2016, 2018; Herd and Moynihan 2018; Nisar 2018). Because burdens are administered by racialized organizations (Ray 2019), they also reinforce racial inequalities, denying benefits to racialized minorities while guaranteeing them to white citizens (Ray, Herd, and Moynihan 2022).

Current examinations of administrative burden are grounded in Enlightenment-era assumptions of a direct citizen-state relationship (Arendt 1979). This conceptualization clarifies the role of burdens in programs that rely on direct service provision or rights claims; policies and rights, however, are often administered and enforced via third-party organizations (Aiken, Ellen, and Reina 2023, this issue; Balough 2015; Dromi 2020; Mayrl and Quinn 2016; Yu 2023). As case studies about abortion policy and social safety net programs demonstrate (see Heinrich et al. 2022; Herd and Moynihan 2018), states may impose costs on

organizations that make service delivery or rights realization more onerous. Further, public policies can impose burdens on subnational government agencies, whether local election boards (Burden et al. 2012) or local safety net program offices (Heinrich et al. 2022). Because organizations and government agencies comprise individuals, burdens targeted at them are experienced by their staff and officials, and have real consequences for the individuals they serve.

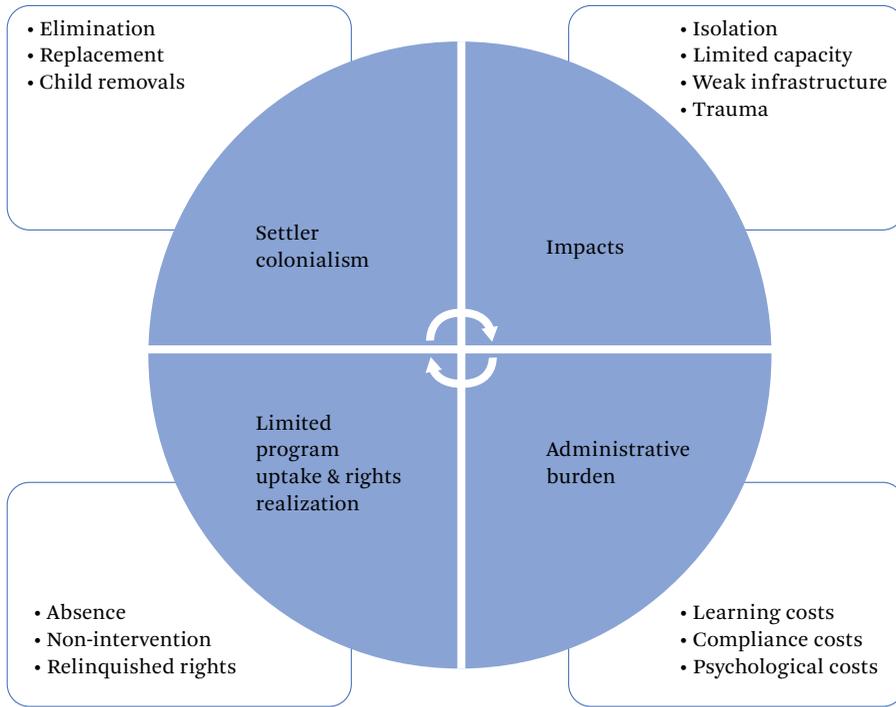
Just as burdens research has typically highlighted the burdens experienced by individuals, it has understood burden-related inequalities in individual terms. This work largely treats inequality as measurable through aggregate individual outcomes and demonstrates how individual-level characteristics such as human capital structure the ability of those individuals to manage burdens. Less studied are the broader systems of domination in which burdens operate. Settler colonialism is one such understudied power structure. Settler colonialism is a specific form of colonial domination. Rather than exploit labor and extract resources from the periphery to the colonial core, settlers work to establish a new society, a task that requires the elimination of indigenous populations and their replacement by settlers and settler institutions (McKay, Vinyeta, and Norgaard 2020; Veracini 2010). Recognizing that settler colonialism is a structure rather than an event (Wolfe 2006), scholars in the field continue to ask how this system of domination is reproduced today (Glenn 2015; McKay, Vinyeta, and Norgaard 2020; Seamster and Ray 2018).

This article argues that administrative burden is a mechanism for the reproduction of settler-colonial domination. Figure 1 illustrates this process. Settler-colonial domination aims to achieve indigenous elimination and settler replacement. Historically, the U.S. settler state has met these goals in various ways, including military force, genocide, coercive treaties, the reservation system, allotment, and a host of assimilationist programs such as urban relocation and child removals (Bruyneel 2007; Fenelon 2016; Steinman 2016; Wilkins and Lomawaima 2001). Settlers justified these efforts with ideological appeals to

white superiority and indigenous inferiority (Glenn 2015; Steinman 2016). These efforts have wide-ranging and ongoing impacts on indigenous communities, including the geographic isolation of many tribal governments on remote lands and the economic marginalization of many indigenous individuals and communities (Cornell 2015; Cornell and Kalt 2000; Stewart et al 2022; Teodoro, Haider, and Switzer 2018). Tribal government infrastructures have also borne the consequences of settler-colonial domination (Cornell and Kalt 2006; Johnson and Hamilton 1995). Settler treaty violations and the allotment and assimilation policies of the early twentieth century stripped tribal governments of many inherent powers, undermining the self-governing capacity of tribes (Deloria and Lytle 1983; Johnson and Hamilton 1995). Tribal governments are diverse and resilient (Cornell 1990), but settler colonialism leaves many today with diminished institutional capacity and limited human and financial capital (Teodoro, Haider, and Switzer 2018).

This undermining of tribal authority and capacity has important consequences for the contemporary era where tribal governments work as “mediating institutions” or third parties that facilitate the relationship between the federal government and tribal members (Steinman 2022, 10). Since the 1960s and 1970s and thanks to a vibrant sovereignty movement, the U.S. government has “grudgingly accepted the principle that Indian nations should have maximum control over their own affairs” (Cornell and Kalt 2006, 13). Many of the benefits and rights afforded to tribal citizens are now administered not by state and federal governments but by tribal governments. Just as historical and contemporary racism leave many minority-serving organizations underfunded and with weak institutional capacity (Ray 2019), settler colonialism has left many tribal governments geographically isolated and under-resourced. These “durable inequalities” (Tilly 1999) mean that tribal governments may encounter learning, compliance, and psychological costs as they seek to facilitate program uptake and guarantee rights for citizens. Legal and policy efforts to dispossess and eliminate tribes have resulted in a complicated “jurisdic-

Figure 1. Administrative Burdens and the Reproduction of Settler Colonialism



Source: Author’s tabulation.

tional maze” (Deloria and Lytle 1983) that produces learning costs for tribal officials. Compliance costs can arise where persistent poverty, geographic isolation, and reduced government capacity place intense demands on tribal governments (Cornell and Kalt 2006). Further, the trauma of settler-colonial domination produces psychological costs in interfacing with federal and state governments. As a result, tribal governments are at times unable to ensure rights realization for citizens, reaffirming settler-colonial domination and the erasure and elimination of indigenous populations. In short, for tribal officials and citizens, burdens today arise from a long history of settler colonialism but also further settler-colonial domination by limiting the ability of sovereign Native Nations to self-govern.

SETTLER COLONIALISM AND THE INDIAN CHILD WELFARE ACT

This article uses ICWA to illustrate these processes. Child removals have long been central

to the settler-colonial project of territorial dispossession. Before the 1800s, settler-colonial domination relied on warfare and physical extermination. In the nineteenth and early twentieth centuries, however, “assimilation became a cheaper and more productive form of annihilation” as the federal government sought to seize and privatize tribal lands for white settlers (Collins and Watson 2022, 7). Officials forcibly removed children from their communities to coerce tribes into giving up their lands. By 1900, the removal of Indian children and their permanent placement with white families and institutions became standard practice in state and federal child welfare (Casey Family Programs 2015). When the federal government adopted a policy of termination in the mid-twentieth century, attempting to eradicate Native Nations and free up tribal resources for the taking, child removals again proved central. The Child Welfare League of America and the Bureau of Indian Affairs collaborated to place Indian children with adoptive white families

(Bussey and Lucero 2013; Casey Family Programs 2015). By severing children's ties to Native Nations, child removals worked to eliminate future generations who would hold claim to tribal land and resources (Casey Family Programs 2015).

All told, between 1900 and 1978, 25 to 35 percent of American Indian children were removed from their homes (Limb, Chance, and Brown 2004). In the late 1960s, American Indian children were placed in foster care at rates sixteen times greater than the general population. In some states, they accounted for 7 percent of all children but 40 percent of the adopted population (Byler 1977).² In the 1960s and 1970s, tribal activists placed these practices under the public microscope and pressured Congress to investigate. During debates, advocates asserted that federal policy should honor tribal sovereignty and allow tribes to assume jurisdiction over child welfare cases involving their eligible members (Cornell 1990; Wilkinson 2006). ICWA faced some opposition but swiftly passed the House and Senate.

ICWA is not a benefits-granting policy. Instead, it guarantees legal rights in child welfare cases involving tribal children and sets standards for child welfare practice.³ First and foremost, ICWA constitutes federal recognition of tribes' sovereign right to self-govern. Whereas pre-ICWA practices forcibly and coercively removed Indian children without consulting tribal governments, ICWA supports tribal self-determination and limits state power over Indian children (Wilkinson 2006). It acknowledges tribal jurisdiction over child welfare cases involving Indian children and affirms tribal governments as *parens patriae* with authority over foster, pre-adoptive, and adoptive placements and over the termination of parental rights for citizen children (Linjean and Weaver 2022). Like other federal Indian policies of the late twentieth century, ICWA involves a government-to-government relationship between tribes and federal authorities. Therefore, ICWA's rights can only be triggered by tribes

because the act's protections are guaranteed to tribal governments.

ICWA honors the sovereignty of Native Nations by requiring that states notify tribes when a child welfare investigation involves an Indian child and permitting tribal governments to assume jurisdiction over child welfare cases involving on-reservation children. Given that child removals long functioned as a way of eliminating Native Nations, ICWA also attempts to shift the practice of child welfare to prioritize family reunification and tribal preservation, setting higher standards and requiring additional efforts before tribal children are removed from their homes. For example, ICWA specifies an order of preference for placement should removals be required, with priority going to placement with extended family members, other members of the child's tribe or other tribes, and foster families or institutions approved by the tribe or by an Indian organization. The law requires that social workers and courts explore whether intensive in-home services would be just as, or more, effective than child removals. As the National Indian Child Welfare Association (2018) notes, "ICWA also encourages the use of culturally specific services that are more likely to successfully strengthen AI/AN families and help AI/AN children stay safely at home. ICWA helps states secure tribal assistance and ensure that experts are present in the courtroom when important decisions about the child are made." These provisions are all aimed at reducing child removals, honoring tribal sovereignty, and "return[ing] the care of Indian children to their people" (Cross, Earle, and Simmons 2000, 49).

ICWA has been hailed as "the most far-ranging [Indian rights] legislation ever enacted" and the gold standard in U.S. child welfare (Wilkinson 2006, 260–61). Four decades on, however, child removals continue apace. Today, American Indian children are placed in state foster care at a rate that is fourteen times higher than their rate in the general popula-

2. These figures come from a survey independently conducted by the Association on American Indian Affairs. No comparable data are available for other racialized groups.

3. ICWA's protections apply to every "Indian child" involved in a child welfare proceeding, and the law defines an "Indian child" as someone with membership in or eligible for membership in a federally recognized tribe.

tion, and 56 percent of kids adopted are adopted outside their families and communities (NICWA 2018). Native children are removed from their homes at two to three times the rate of white children (NICWA 2017) and are more likely than any other racialized group to experience foster care placement or termination of parental rights (Wildeman, Edwards, and Wakefield 2019). Although rates of foster care placement for black children decreased from 2000 to 2018, those for Native American children increased (Roehrkasse 2021). I illustrate how burdens limit ICWA's promise to reduce these inequalities and fuel the reproduction of the settler-colonial child removals that ICWA aims to prevent.

DATA AND METHODS

Because ICWA's protections can only be triggered by tribes, ICWA's administrative burdens fall on tribal governments and officials. I focus on the burdens that most frequently prevent Native Nations from intervening early to invoke ICWA. Public data on tribal child removals and the processes that produce them are limited. My analysis therefore draws on forty years of archival materials, from 1978 to 2018, from a wide range of sources to identify these burdens and assess their implications for tribes' ability to invoke ICWA and for child removals generally.

First, I analyzed annual federal reports that include interviews and focus groups with tribal officials and state child welfare agencies from all fifty states. These reports cover various aspects of ICWA implementation, including tribal governments' reports on frequently encountered barriers. I also collected and analyzed fifty publicly available ICWA evaluations conducted by state agencies as well as by tribes and experts in tribal child welfare. I identified these evaluations using keyword searches of government agencies, child welfare organizations, libraries, and state archives. Each assessed the extent to which implementing agencies were abiding by the statute, how child welfare caseworkers applied it, and the challenges tribal governments faced in invoking it. My analysis includes data collected from presentations by child welfare practitioners at the 2019 National Indian Child Welfare Association

(NICWA) conference and from the University of Minnesota's Child Welfare Archive.

I draw heavily from a collection of archival materials from Maine. In 2013, the state's governor and the chiefs of the five Wabanaki tribes launched a Child Welfare Truth and Reconciliation Commission (TRC), to investigate the Wabanaki child removals. I analyzed all publicly available testimonies (119) and focus group (8) transcripts from this archive, including statements from tribal and state officials. These materials offer multiple benefits to the present study. For one, the TRC is the most comprehensive assessment on record for Indian child welfare procedures. Additionally, Maine has a troubled history of state-tribal relations, and American Indian children in the state are at disproportionate risk of family separation. Since 2000, the risk for termination of parental rights for Indian children has been higher in Maine than in all but two other states (Wildeman, Edwards, and Wakefield 2019). I analyzed these documents to identify and classify administrative burdens in ICWA implementation, but I also compare these Maine findings with reports from other states, NICWA materials, and secondary sources to trace broader patterns in tribal governments' experiences with administrative burden.

When administrative burden prevents tribes from invoking ICWA's protections, child welfare cases may be adjudicated in court; therefore, my analysis also includes materials from sixty court cases (forty-seven state court, two U.S. Supreme Court, and eleven lower federal court). For each, I compiled and analyzed oral arguments, decisions, and associated materials. These materials capture tribal officials' reports of burden and its consequences. The materials also allowed me to assess how burdens are framed by opponents seeking to undermine ICWA.

In what follows, I highlight the learning and compliance costs most faced by tribes in working ICWA. Unless otherwise noted, the burdens examined here have been largely consistent across the forty years under study. This stability not only allows for a focused examination of ICWA-related burdens, but also illustrates a central dynamic of racialized burdens. As Victor Ray, Pamela Herd, and Donald Moyni-

han (2022) note, burdens may be racialized today because they are rooted in past efforts to marginalize social groups, in this case, settler colonialism. This analysis empirically demonstrates how racialized burdens persist and structure contemporary systems of domination.

LEARNING COSTS

ICWA governs state casework practice, state and tribal court proceedings, and other aspects of child welfare cases (see figure 2). Its provisions contain myriad subprocesses that complicate the activation of rights under ICWA and present learning costs for tribal governments. Existing work notes that ICWA presents learning costs for state officials (Bussey and Lucero 2013; Casey Family Programs 2015; GAO 2005; Kessel and Robbins 1984), but less reported on are the learning costs it has created for tribal governments.

ICWA's learning costs are particularly pronounced because of the complex jurisdictional issues involved. ICWA is a federal statute, meaning the processes outlined in figure 2 apply nationally; however, a host of other factors determine how an individual ICWA case proceeds. Because child welfare falls under state jurisdiction, the procedures for triggering ICWA's rights vary by state. Further, more than thirty states have adopted statutes specific to ICWA. These vary from state-specific ICWA statutes that guarantee even stronger protections for tribal children than federally required to statutes governing specific elements of the Indian child welfare process. Because the more than five hundred tribal governments have different formal legal and political relationships with states, the process for exercising rights under ICWA varies along tribal-state lines depending on the contours and specifics of these arrangements. In addition, more than sixty tribal governments have their own child welfare codes, and increasing numbers of tribal governments have formed state-tribal agreements around child welfare (NARF 2015; NCSL 2019;

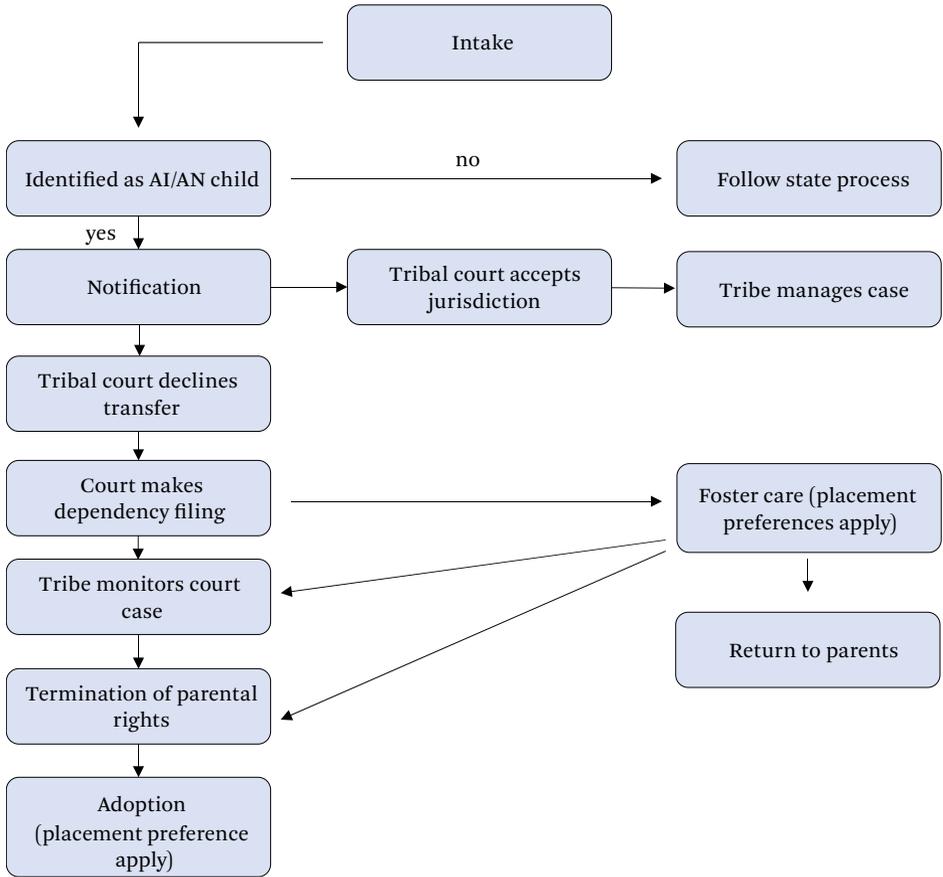
Bureau of Indian Affairs 2016). As a result, the route any two tribal governments might need to take to activate ICWA and the rights available to them can vary dramatically.⁴ These complexities result from the settler-colonial federalist structure of the U.S. government (Dahl 2018) and reflect the institutionalization of the ongoing tug-of-war between tribal efforts to maintain sovereignty and state efforts to dispossess, undermine, and eliminate tribes (Deloria and Lytle 1983). The learning costs for tribal governments are only exacerbated by the fact that tribal governments may be working on child welfare cases involving citizen children who live in different states due to settler-colonial relocation efforts that moved of hundreds of thousands of tribal citizens from tribal lands to urban areas (Steinman 2022).

Given these realities, evaluations of ICWA have consistently stressed the learning costs associated with its application. One of the first evaluations of the law's implementation found that tribal authorities received virtually no training from the Bureau of Indian Affairs on how to exercise rights under the law (Kessel and Robbins 1984). In the 1980s and 1990s, reports indicated that tribal governments were often unaware of state ICWA requirements and that tribal authorities, especially those new to the law, were often unaware of its provisions or of the designated and often-changing bureaucratic channels for responding (Brooks 1994; Jones et al. 2000). In 2015, reflecting on a long career in the field, one tribal caseworker in Maine explained,

I don't think that there's a system for training [among most tribes]. When you look at what the ICWA workers have to go through for the bands and for the tribes versus what the State is all about. [For state workers] almost every day there's a fricking training going on and we're hanging on to coattails . . . because they probably have ten divisions with how many people in [them] to support all of that process, and there's usually one person . . . that's

4. Tribal-state agreements can affect everything from how states notify tribes in emergency removal and initial state hearings, who the point of contact is between tribes and states, who is responsible for determining whether ICWA applies to a case, who covers costs for a case, and how foster families are identified and recruited (Bureau of Indian Affairs 2016; Trope and O'Loughlin 2014; Wilkins 2008).

Figure 2. The Indian Child Welfare Process



Source: Author’s tabulation, adapted from Casey Family Programs 2011, Indian Child Welfare Act (Pub. L. 95-608, 92 Stat. 3069), and NARF 2007.

working part-time that’s working for the bands of the tribes trying to do it all. (Anonymous 2015)

Training opportunities increased in recent years with the establishment of organizations like NICWA and the Capacity Building Center for Tribes, but many tribal officials can still recount the moment they first learned about ICWA and the machinations they had to go through to learn how to work it. Asked to recount her experience, the director of New Mexico’s Tribal Indian Child Welfare Consortium (TICWC) Donalyn Sarracino (Pueblo of Acoma), explained that she even though she worked in

the field she knew very little about ICWA until she received a call from the state in August 2015 asking her to provide expert testimony in a termination of parental rights hearing involving a child from her Pueblo (NICWA 2019a).⁵ Sarracino recognized that termination should not be proceeding without the involvement of the tribe. However, it took a long process of learning about ICWA for her to fully understand how her tribe should intervene given New Mexico’s specific statutes and new federal regulations. The learning process involved months of information gathering, including costly trips for NICWA trainings. Only after that expense were she and her tribe able to intervene.

5. In ICWA cases involving child removal, the law requires testimony from a “qualified expert witness” as to whether “active efforts” were made to reunify a child with their parents or custodians.

High rates of turnover among tribal workers make these learning costs particularly burdensome. As Jacqueline Yalch (Pueblo of Isleta), vice president of TICWC explained, her organization formed to limit learning costs by facilitating information sharing and coordination across New Mexico's tribes. These leaders educate themselves on ICWA but explain: "There's always turnover so we're starting from the ground up" each time caseworkers come and go. That tribal leadership changes frequently, sometimes yearly depending on the tribe, "poses a challenge as well" (NICWA 2019a). Organizations such as the TICWC have become instrumental for tribal leaders because they facilitate access to training on how to work ICWA. Many tribal governments, however, incur these learning costs on their own. These costs are further exacerbated by ongoing settler colonialism that leaves many without the resources required to manage them. As a result, ICWA's protections are often not triggered, and child welfare cases that should be governed by ICWA end up proceeding in state systems where child removals are far more likely and tribal sovereignty and rights are further eroded.

COMPLIANCE COSTS: NOTICE

For many tribal officials, invoking ICWA's protections also involves compliance costs. Unlike learning costs, which reflect ICWA's complex structure, compliance costs often result from seemingly straightforward ICWA requirements. ICWA's notice provisions are a prime example. ICWA depends on states' early communication with tribes regarding child welfare cases that involve their children. ICWA requires that state agencies provide this notification to tribes in a timely manner and states that no foster care placement or termination of parental rights proceeding can be held until at least ten days

after receipt of notice.⁶ Congress intended for these notice provisions to honor the sovereignty right of Native Nations to assume jurisdiction over child welfare cases involving their citizen children. The ten-day time frame prevents states from seizing tribal children without informing tribal governments.⁷ Existing studies find that states have routinely failed to notify tribes of potential ICWA cases (Crofoot and Harris 2012; Kunesch 2007; Waszak 2010), but ongoing settler colonialism also creates compliance costs for tribes.

Since 1978, notice has been one of the most persistent barriers to ICWA implementation (Fort and Smith 2018). Indeed, since ICWA's passage, tribal leaders and child welfare experts have voiced concerns about the ability of many tribes to receive notice and to respond within ten days, noting that this nonresponse is usually due to an inadequacy of tribal resources (Casey Family Programs 2015; GAO 2005; Kunesch-Hartman 1989). Due to generations of settler-colonial efforts to decimate tribes, many are poorly resourced and have only minimal government infrastructure (Tucker, De Leon, and McCool 2020). Consequently, some tribes respond quickly to notice and others struggle to reply at all (Francis et al. 2014).

For tribal governments facing resource constraints, notice response is hampered by a lack of reliable communication technologies. The Confederate Tribe of Siltz Indians in Oregon reports repeatedly responding to notice only to find that state agencies never received their reply due to a fax machine error (Children's Bureau 2015). ICWA requires that notice be sent by registered or certified mail, but tribal staffing limitations often mean that no one is present in an office to receive certified letters. Registered mail requires the addressee to pick up

6. Tribal governments may request an additional twenty days, but this extension is not guaranteed.

7. ICWA's notice provisions were debated by the 1977 Senate Select Committee on Indian Affairs. Representatives from dozens of tribal governments and Indian organizations participated, as did representatives from the Bureau of Indian Affairs, the Department of Health, Education, and Welfare, various state governments, and the American Civil Liberties Union (ACLU). Originally, ICWA provided for a thirty-day notice period, but the National Congress of American Indians, the ACLU, and other organizations criticized the thirty-day period as too long. They argued that no state should be permitted to seize an Indian child for that long without notifying the child's tribal government and that allowing such would perpetuate existing child removal practices. Hearings on S. 1214, before the Select Committee on Indian Affairs, 95th Cong., 1st sess. (1977).

mail directly from the postal service, and the postal service will only release the letter to the addressee with photo identification. Because of federal relocation programs and the settler-colonial reservation system, many tribal governments are based in remote areas with weak transportation infrastructure and little to no access to post offices or high-speed internet (Tucker, De Leon, and McCool 2020; Wang 2018).⁸ Given these barriers, notice may not arrive, let alone permit a response, within ten days. As one tribal ICWA official explained, “I’m readily available, but I’m not [always] able to come in and check my mail or sign for a letter . . . and if I can’t make it to the post office on a Friday or Sunday, and it’s sitting there. . . . I can’t say, ‘Well, I’m sorry I wasn’t able to make it, ’cause the mail was in the mailbox’” (Joseph 2014).

The original intent behind these notice provisions was to limit child removals by enabling tribal involvement in child welfare; however, settler-colonial domination—and limited government efforts to address it—create burdens for tribal governments. Federal ICWA allocations cover less than 25 percent of tribal needs, and funding is provided via year-to-year grants. This funding structure has meant that just as tribal governments began building sustainable child welfare infrastructure, their funding would disappear. In the 1990s, tribal governments finally received funding to hire a dedicated ICWA staffer, but 477 of the 558 eligible tribal governments received less than \$10,000 per year (Cross, Earle, and Simmons 2000). The lack of stable, consistent funding has produced instability in tribal child welfare operations that affects notice response. As an example, a Maine caseworker, who worked closely with the state and tribal governments, noted that the Penobscot Nation had “only one caseworker [so] a lot of things were getting left not being addressed . . . and somehow it came up again and they were already halfway almost through the case until we were on board, which it should have been the very beginning” (Anonymous 2014a). These resource constraints routinely leave many tribal governments unable to

receive and respond to notice, and cases that should be guided by ICWA proceed under standard state procedures.

Given these compliance costs and lack of state cooperation, notice has been the subject of more ICWA-related court cases than any other issue (Fort and Smith 2018), and state reports to the U.S. Department of Health and Human Services have consistently identified notice-related compliance costs as barriers to ICWA implementation (Children’s Bureau 2015). These compliance costs are exacerbated by state-level failures to issue notice in the first place. The rate of tribal notification has been as high as 80 percent in some states but as low as 33 percent in others (Brown 2002; Hollinger 1989; Jones et al. 2000; Plantz 1988). Ample evidence suggests that state noncompliance is sometimes deliberate. ICWA imposes administrative burdens on tribes, but also on state caseworkers who administer the policy. These burdens lead administrators to avoid ICWA to speed up bureaucratic processes, facilitate private adoptions, or simply avoid transferring jurisdiction to tribes whom they believe are racially ill-equipped to parent children (Berger 2015; Brown 2020). Absent early notification and response, tribes are unaware of cases involving their children and cannot intervene, and the child’s removal and placement in a non-Indian foster or adoptive home become more likely (Turner 2016). Further, these intentional efforts to undermine ICWA marshal settler ideologies of indigenous inferiority toward the end outcome of child removals (Brown 2020).

COMPLIANCE COSTS: FAMILY MEETINGS AND HEARINGS

ICWA’s promise to reduce child removals also rests on active tribal involvement in child welfare cases. Recognizing that state child removal efforts have long been grounded in biased judgments of tribal cultures and that tribally based social services are often the best hope for family and tribal preservation (Belone et al. 2002; Jacobs 2014; Wilkinson 2006), ICWA requires that states involve tribal governments in family

8. The federal government estimates that broadband access in tribal communities at less than 10 percent (Tucker, De Leon, and McCool 2020)

meetings and removal hearings, including tribal co-management of case plans. The costs associated with meeting and hearing participation, however, can present another burden for tribal officials.

For one, taking an active role in case management requires time, resources, and expertise that some tribal governments lack because of settler-colonial domination. Not the least of these barriers are geographic obstacles. Due to historical dispossession and relocation, tribal lands and governments are often hundreds of miles away from state child welfare offices. Just as isolation-related burdens prevent local government agents from obtaining services for their clients (Heinrich et al 2022), tribal officials must often expend extensive time and resources to travel these distances simply to take a legally guaranteed seat at the table in a child welfare case. The same holds for court hearings. In Minnesota, Judge Sally Tarnowski reported that tribes in her district often had to drive two to three hours each way to get to Duluth for hearings (NICWA 2019b). Unless ICWA cases are intentionally scheduled for a specific day of the week, tribes might have to come multiple days a week, often on short notice. These issues are so widespread that the U.S. Department of Health and Human Services acknowledges that “large geographic distances between state and tribal staff for in-person meetings” have long been barriers to ICWA implementation around the country (Children’s Bureau 2015, 9).

Both fiscal and time constraints limit tribal officials’ abilities to participate in these meetings. Travel expenses mount, posing a barrier to tribal participation and to ensuring children remain with their tribes (Children’s Bureau 2015). Further, many tribes have a small staff who deal with a range of administrative and legal issues. As the Maine-Wabanaki Truth and Reconciliation Commission interviewee reported, “It’s very difficult just doing [family meetings] normally, but the tribe . . . has been very responsive once they know it’s a Native, trying to come. But they’re busy and they have their schedules, so trying to get everybody . . . together can take a while” (Anonymous 2014d). Due to these other obligations and the time constraints involved in travel, “many [tribal]

stakeholders that want to attend meetings are unable to do so” (Children’s Bureau 2015). Only a few jurisdictions nationwide consolidate ICWA cases on a single day each week or allow tribes to routinely telephone in for meetings and hearings. Yet, as the National Council of Juvenile and Family Court Judges (Korthase, Gatowski, and Erickson 2021) reports, easy tribal access to child welfare meetings and hearings is crucial to ensuring the engagement of tribal families and representatives in ICWA implementation.

These barriers stem from the legacy of U.S. settler colonialism. However, they also reflect settler colonialism as ongoing structure (Wolfe 2006). ICWA set forth requirements for tribal involvement in cases, but, as noted earlier, Congress never appropriated the resources required to ensure tribal involvement (MacEachron et al. 1996). Because of urbanization and relocation programs, many children who qualify for ICWA protections do not live in the same state as their tribal government, making travel costs even more onerous for tribes. As one participant in the Maine-Wabanaki Truth and Reconciliation Commission explained, “It’s a good thing, for the most part [ICWA]. . . . The drawback to that is that there’s not a lot of money associated with helping those children for those big cases and legal fees and travel and out-of-state costs. So it has helped to some degree . . . but we need to build the capacity within the tribe to make sure that [ICWA is] carried out properly and we do justice to the children” (Maine Wabanaki REACH 2014). Absent adequate funding and decolonizing efforts, tribal governments find themselves unable to invoke ICWA’s protections, and settler-colonial child removals proceed apace.

When burdens prevent tribes from attending meetings or taking an active role in a case, the response from state agencies is rarely to adopt protocols that ease these burdens. Evidence suggests that state agencies instead use burden-induced tribal non-involvement as justification for sidestepping ICWA altogether. As Martha Proulx, the ICWA Liaison for the Office of Child and Family Services, explained of Maine’s child welfare apparatus, “Our staff sometimes forget that we have a lot of staff and Tribal Child Welfare don’t. . . . if they don’t get

back to us right away, or if they can't make the certain meetings at the certain time, people get frustrated and think that [tribes] don't want to be involved" (Proulx 2014). Hoping to move quickly through cases, state workers often wish to avoid coordinating scheduling with tribes "even if there's been some agreement going in about what the bottom lines are" (Anonymous 2014a). Thus tribal officials routinely report that "You know, meetings can happen, and we might not know about them, or we find out after the fact. And that's never good because then we're always out of the loop and till we kind of push back in" (Francis et al. 2014). In this respect, the burdens faced by tribal officials are exacerbated by the unwillingness of state agencies to ensure ICWA application.

COMPLIANCE COSTS: CERTIFYING FAMILIES

The certification of tribal foster care families also involves compliance costs that prevent tribal governments from exercising rights under ICWA. ICWA's placement provisions identify tribal foster families as a preferred placement should a child need to be removed from their family. This provision honors tribal sovereignty and recognizes that family reunification is more likely if tribal children can remain with their tribal communities. However few tribal children are placed in out-of-home care with tribal families. In Maine, for example, half of Wabanaki children are placed in non-Native homes (Maine Wabanaki REACH 2015), and similar patterns arise elsewhere in the country. Experts attribute these patterns to a lack of certified tribal foster families (Children's Bureau 2015; GAO 2005; Plantz 1988), but this claim overlooks the burdens that prevent tribal families from becoming certified.

The logistical and resource barriers that make notice and meeting attendance problematic also pose problems for foster family certification. For example, meeting certain federal standards, such as the requirement to be fingerprinted, involves compliance costs for tribes and tribal families (McKechnie 2014; Proulx 2014). Not only that, the geographic size of some states and the geographic isolation of many tribal governments inhibits their ability

to work with states to certify foster families (Children's Bureau 2015). The burdensome certification process is further complicated by state agents' settler ideologies about "what's clean and what's decent . . . and what's safe" (Anonymous 2014c). As they did historically, state agents often continue to judge potential foster homes with a "white eye," not a "tribal eye," invoking racialized notions of worth and deservingness long used to deny tribal sovereignty (Anonymous 2014c; Brown 2020). These biases have left many states unwilling to allow Native Nations to certify their own foster families. However, as one tribal leader noted, "If we [had the ability to certify tribal foster families], then there would be more families that would qualify . . . we have some really good families that [may] have made mistakes in the past that have totally changed their life around" (Paul 2014).

These challenges arise as tribes work to meet state and federal certification requirements; however, even where tribes are legally permitted to certify foster families, administrative burden complicates the process. In Maine, legislation passed in 1999 that allows states to certify tribal families based only on the background work conducted by tribal governments. Yet tribes may lack the staff and resources to conduct these background assessments themselves. As one worker stated in a focus group, "I'm here by myself, there's only one person in the ICWA department and that's me. . . . And so if I can't make it to every little thing . . . I [get] so mad because I can't be in a hundred different places . . . at once, I'm one person I'm responsible for three grants [and] trying to do assessments, trying to license foster homes, trying to go to family team meetings, doing everything . . . in one week" (Maine Wabanaki REACH n.d.). In addition to these staffing and resource barriers, tribes must use state-generated data and standards to make their assessments, even when tribal standards for family certification differ from state ones (Maine Wabanaki REACH 2015). Often, tribal staff report, state agents refuse to accept tribes' background research and force families and tribes through the licensing process all over again (Gousse 2015, 1; Proulx 2014). Absent certified tribal families, ICWA children are placed out-

side with settler families and institutions, perpetuating the same practices ICWA sought to end.

LEGAL CHALLENGES TO ICWA AND THE POLITICAL APPROPRIATION OF BURDENS

Political actors often create burdens to achieve policy goals (Herd and Moynihan 2018), but ongoing struggles over ICWA illustrate how political actors also use burdens as an ideological justification for removing or severing rights. Over the last fifteen years, a coordinated group of libertarian and conservative think tanks, private adoption agencies, and racially conservative organizations have launched a concerted attack on ICWA, characterizing it as an unconstitutional race-based statute. Ample evidence suggests that these ICWA opponents are not opposed to ICWA *per se*. Instead, they view overturning ICWA as an expedient way to challenge racially progressive policies such as affirmative action and to undermine federal Indian law, freeing up tribal resources—including tribal children—for private acquisition (Berger 2019). These challenges have resulted in a spate of ICWA court cases in recent years.⁹

These court cases demonstrate another way burdens reproduce settler colonialism. A key legal strategy for these ICWA opponents is to marshal settler-colonial ideologies of indigenous inferiority to achieve settler-colonial outcomes. Rather than recognize and rectify the burdens that inhibit tribal governments from fully invoking ICWA, ICWA opponents regularly cite tribal nonintervention in child welfare as evidence that tribes are irresponsible, uncaring, and unable to ensure the safety of their children. They have routinely argued in court that tribal nonresponse or late reply to notice is evidence of irresponsibility and ineptitude. ICWA opponents characterize these delays as tribal failure (Bakeis 1996) and accuse tribes of intentionally delaying proceedings.¹⁰ They further argue that tribal governments' delayed or nonresponse to notice can "result in children

being sent back to abusive homes" and otherwise "cause harm" to vulnerable children. ICWA opponents frame tribes not as grappling with burden but as irresponsible and disinterested in protecting children's welfare (Flatten 2015). In so doing, they perpetuate the very settler-colonial ideologies and practices that led to ICWA's passage.

ICWA opponents have also used the lack of tribal foster families to justify undoing ICWA. These actors rarely, if ever, address the administrative burden involved in certification. Instead, they portray tribes as unwilling to identify families or portray tribal families as alcoholic child abusers while upholding the actions of the settler state as moral and just (Flatten 2015; Sandefur 2017a). For example, the Goldwater Institute, a key player in the ICWA constitutional challenge, notes that "Indian foster parents are scarce. Los Angeles County, with its population of 10 million people, has only one" (Sandefur 2017b, 18). Regardless of their factual basis, these inferences buttress Goldwater's claims that tribal governments are incapable of protecting children's rights. As is true of racialized organizations generally, court support of these arguments serves to "normalize and reinforce patterns of racial inequality . . . reproducing disparate treatment while obscuring" and the ongoing structure of settler colonialism that created those inequalities (Ray, Herd, and Moynihan 2022). Because the court ruling sought by ICWA opponents would not only strike down ICWA but also upend all tribal gaming, natural resources, and land rights, ICWA opponents are in essence using settler-colonial ideologies to reframe administrative burden in pursuit of settler-colonial goals.

DISCUSSION AND CONCLUSION

This article argues that administrative burden is a mechanism for the reproduction of settler-colonial domination. ICWA aimed to destabilize a key settler-colonial project: child removals. Situated in a complex maze of intergovernmental

9. These attacks culminated in *Haaland v. Brackeen*, heard by the Supreme Court on November 9, 2022 (Docket no. 21-376).

10. Brief of Amicus Curiae in *Adoptive Couple v. Baby Girl, et al.*, U.S. Supreme Court. 398 S. C. 625, 731 S. E. 2d 550 (2013), reversed and remanded.

tal relationships, ICWA presents learning costs for tribes charged with asserting its rights. Core ICWA procedures such as notice, meeting attendance, and foster family certification present compliance costs for tribal governments that are underresourced and geographically isolated because of settler colonialism. As with other programs (Heinrich 2016; Heinrich et al 2022; Herd and Moynihan 2018), the cost of these burdens is that tribes are often unable to claim rights under ICWA and ensure its protections are applied to child welfare cases. Consequently, ICWA's protections are never triggered and child removals proceed apace. Under these circumstances, administrative burden is a mechanism by which policy efforts to challenge settler colonialism end up reinforcing it, facilitating child removals, undermining tribal sovereignty, and shoring up settler state power.

My focus in this article is on learning and compliance costs, but evidence suggests psychological costs for tribes and tribal families as well. Contemporary child removals are part of a centuries-long history of Indian child removals (Jacobs 2014). Onerous encounters with the state, especially those that risk or result in child removal, amplify the collective trauma that child removals have generated for generations. As one child welfare caseworker recounted, many tribes harbor “a fear of DHS [Department of Human Services]. Who would want to get involved with us? We were involved in taking children away” (Anonymous 2014b). This trauma only intensifies when state authorities remove tribal children from their homes and communities. One tribal caseworker summarized these collective psychological costs, saying, “It’s painful to be Indian. It’s painful to work the ICWA” (Anonymous 2015).

The origins and intentions behind ICWA's burdens are complex. Many provisions were intended to facilitate tribal intervention to prevent child removals and honor tribal sovereignty. ICWA's burdens arise because the law itself does nothing to disrupt the ongoing structure of settler colonialism. Marginalization, poverty, and rurality can make it difficult for some tribal governments to satisfy ICWA requirements. Few resources have been appropriated to tribes to facilitate implementation. Little consideration was given to building up

tribal infrastructure. Some states even have laws in place that prevent tribes from establishing infrastructure, like tribal courts, which would facilitate ICWA implementation (Paul 2014). Although some of these burdens result from malign neglect, others result from intentional, active efforts to undermine tribal sovereignty and maintain state jurisdiction over child welfare. Regardless of their origins, the outcomes of these burdens are the same. Child welfare cases that proceed in state systems are far more likely to result in child removals than are cases with active tribal involvement. When burdens prevent this involvement, they reproduce settler-colonial child removal practices and undermine tribal sovereignty. In this regard, ICWA demonstrates how racialized burdens persist across time and continue to structure racialized systems of domination in the present (Ray, Herd, and Moynihan 2022). These issues are germane beyond the field of child welfare. For example, efforts to expand voting by mail often fail to consider that tribal lands can be hundreds of miles from post offices. Absent consideration of settler colonialism, efforts to alleviate burden may create new burdens and facilitate exclusion and inequality.

ICWA's burdens have not only exacerbated child removals but also created openings for political actors to reinforce settler colonialism. ICWA opponents cite tribal nonintervention in child welfare as evidence that tribes are unable to ensure the safety of their children. They marshal these settler-colonial claims in the service of a settler-colonial project: an effort to overturn the law as part of a coordinated effort against tribal sovereignty and racially progressive policies. Similar processes may be at play in other policy arenas. For example, political opponents accuse unemployment and Earned Income Tax Credit beneficiaries of fraud, but often it is the complex rules of these programs that increase the likelihood that individuals will make mistakes in their reporting. In these cases, as with ICWA, political actors not only create burdens but also use them as justification for weakening public rights and benefits.

ICWA also demonstrates the utility of examining burdens targeted at organizations. This article shows that burdens may reinforce inequalities when they affect third-party organi-

zations that serve racialized minorities. When implementing organizations primarily or exclusively serve racialized minorities, organizationally targeted burdens can reinforce racial inequality at the group and individual levels (see Ray 2019). That said, federal Indian laws like ICWA are unique examples of the associational state because tribes are not typical third-party organizations; they are sovereign governments. Still, ICWA suggests that an eye toward organizationally targeted burdens can illuminate how burdens structure racial inequality in other policy arenas that depend on either third-party implementers or those that direct relief to individuals via formal organizations. In one example of the former, the Refugee Act of 1980, charges Voluntary Agencies with implementing refugee resettlement programs. To the extent that policymakers place undue burden on these organizations, such as during the Donald Trump administration (Siegler 2019), these burdens may affect how well these organizations can fulfill the Refugee Act's provisions. The Paycheck Protection Program (PPP) is a clear example of the latter. PPP allowed applicants access to forgivable low-interest loans to withstand costs during the COVID pandemic. However, black-owned businesses were poorly equipped to withstand the paperwork and other burdens involved in accessing loans, producing racial disparities in PPP loans and, consequently, paycheck protections for employees in those businesses (Morel, Al Elew, and Harris 2021; Derby 2021).

In 2016, after nearly four decades of research on ICWA implementation, the Bureau of Indian Affairs issued new federal ICWA regulations that are binding on state courts (Linjean and Weaver 2022). Even though this "Final Rule" clarifies standards to ensure uniform ICWA practice across the country, it largely leaves untouched the issues reported here. Implementation guidelines recommend but do not require courts to offer virtual options for participation in hearing or deliver notice in multiple forms. The ten-day notice rule remains, and the goal of these documents is to establish standard procedures, not allocate more resources.

Recent developments, however, suggest ways to counter ICWA's burdens. Dramatic re-

ductions in out-of-home placements emerge where tribal governments have the resources to support independent tribal courts and greater autonomy to support self-determination (Cross et al. 2015). The rise and proliferation of ICWA courts are one example. Six judicial districts have established separate courts that operate within but autonomously from their larger court systems. ICWA courts limit burdens by scheduling all of a tribe's cases on set schedules. ICWA court officials often journey to tribes for meetings to engage them more directly, further reducing compliance costs. In some jurisdictions, ICWA courts have even changed the standard forms used for tribal child welfare cases to ease burdens and ensure proper ICWA application (*Montana Standard* 2019). ICWA courts are far more successful than their state counterparts in ensuring proper notice, tribal attendance at meetings, and reducing child removals (Korthase, Gatowski, and Erickson 2021; Padilla 2019). In the first years of Denver's ICWA court, for example, only one ICWA case resulted in the termination of parental rights, a striking contrast to national rates (Delgado 2019). Because inequalities are embedded in organizations (Acker 2006; Ray 2019; Tilly 1999), establishing new organizational forms such as ICWA courts provides an avenue for reducing burdens and challenging the durable inequalities they reproduce.

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