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CHILD CARE AND EARLY CHILDHOOD EDUCATION

More Information
Sharing and Program
Review by HHS Could
Enhance Access for
Families with Limited
English Proficiency





Highlights of [GAO-06-807](#), a report to congressional requesters

CHILD CARE AND EARLY CHILDHOOD EDUCATION

More Information Sharing and Program Review by HHS Could Enhance Access for Families with Limited English Proficiency

Why GAO Did This Study

Questions have been raised about whether parents with limited English proficiency are having difficulty accessing child care and early education programs for their children. Research suggests that quality early care experiences can greatly improve the school readiness of young children. GAO was asked to provide information on (1) the participation of these children in programs funded through the Child Care and Development Fund (CCDF) and Head Start, (2) the challenges these families face in accessing programs, (3) assistance that selected state and local entities provide to them, and (4) actions taken by the Department of Health and Human Services (HHS) to ensure program access. To obtain this information, GAO analyzed program and national survey data, interviewed officials in 5 states and 11 counties, held 12 focus groups with mothers with limited English proficiency, and interviewed experts and HHS officials.

What GAO Recommends

GAO recommends that HHS help states explore cost-effective ways of collecting data on the primary language of CCDF subsidy recipients and that HHS develop means of reviewing how states provide access to CCDF subsidies. In comments, HHS generally agreed with our recommendations and provided additional information on its actions and plans to implement them.

www.gao.gov/cgi-bin/getrpt?GAO-06-807.

To view the full product, click on the link above. Translated report summaries are available in selected languages at <http://www.gao.gov/translations/childcare.html> For more information, contact Cornelia Ashby at (202) 512-7215 or ashbyc@gao.gov.

What GAO Found

HHS's Child Care Bureau (CCB) did not have information on the total enrollment in CCDF programs of children whose parents had limited English proficiency, but data collected by its Office of Head Start in 2003 showed that about 13 percent of parents whose children were in Head Start reported having limited English proficiency. The most recent (1998) national survey data showed that children of parents with limited English proficiency were less likely than other children to receive financial assistance for child care from a social service or welfare agency or to be in Head Start, after controlling for selected characteristics. Eighty-eight percent of these children were Hispanic, and their results differed from Asian children.

Likelihood of Selected Outcomes for Children of Parents with Limited English Proficiency, after Controlling for Other Factors

	Compared to similar children of parents proficient in English		
	All children of parents with limited English proficiency	Hispanic children of parents with limited English proficiency	Asian children of parents with limited English proficiency
Receipt of financial assistance for child care	Less likely	Less likely	No significant difference
Head Start	Less likely	Less likely	More likely

Source: GAO analysis of Early Childhood Longitudinal Study, Kindergarten Class of 1998-99.

Analysis of data from focus groups and site visit interviews held by GAO revealed that mothers with limited English proficiency faced multiple challenges, including lack of awareness of available assistance, language barriers during the application process, and difficulty communicating with English-speaking providers. Some of the challenges that low-income parents with limited English proficiency experienced, such as lack of transportation and shortage of subsidized child care slots, were common to other low-income families.

The majority of state and local agencies that we visited offered some oral and written language assistance, such as bilingual staff or translated applications. Agencies in the majority of locations visited also made efforts to increase the supply of providers who could communicate with parents. Officials reported challenges in serving parents with limited English proficiency, such as difficulty hiring qualified bilingual staff. Some officials indicated that additional information on cost-effective strategies to serve this population would facilitate their efforts.

HHS issued guidance, translated materials, and provided technical assistance to grantees to help them serve children of parents with limited English proficiency. The Office of Head Start reviewed programs' assessments of their communities' needs and conducted formal monitoring reviews, but could not ensure that review teams consistently assessed grantees' performance on the standards related to language access. CCB reviewed states' plans on the use of CCDF funds generally and investigated specific complaints, but had no mechanism for reviewing how and whether states provide access to CCDF subsidies for eligible children of parents with limited English proficiency.

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Abbreviations

ACF	Administration for Children and Families
CBRS	Computer-Based Reporting System
CCB	Child Care Bureau
CCDF	Child Care and Development Fund
CRADLE	Culturally Responsive and Aware Dual Language Education
ECLS-K	Early Childhood Longitudinal Study, Kindergarten Class of 1998-99
FACES	Family and Child Experiences Survey
HHS	Department of Health and Human Services
HSNRS	Head Start National Reporting System
LEP	limited English proficiency
NACCRRRA	National Association of Child Care Resource and Referral Agencies
NCES	National Center for Education Statistics
OCR	Office for Civil Rights
PRISM	Program Review Instrument for Systems Monitoring
TANF	Temporary Assistance for Needy Families

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United States Government Accountability Office
Washington, DC 20548

August 17, 2006

The Honorable Charles E. Grassley
Chairman
Committee on Finance
United States Senate

The Honorable Max Baucus
Ranking Minority Member
Committee on Finance
United States Senate

The Honorable Christopher J. Dodd
Ranking Minority Member
Subcommittee on Education and Early Childhood Development
Committee on Health, Education, Labor, and Pensions
United States Senate

Children whose parents have limited English proficiency are at greater risk of experiencing difficulties in school than children from English-speaking households. Research suggests that quality early care experiences can greatly improve the school readiness and future school success of young children, particularly children at greatest risk of failure. U.S. Census Bureau data from 2000 indicate that more than 1.6 million children age 5 and younger lived in households where no one aged 14 or over reported English proficiency. Census data also show that these children were more likely than other children to be from low-income families. There is interest in how this population is faring in accessing child care and early education programs that can ease children's transition to school.

The U.S. Department of Health and Human Services (HHS) administers the two largest federally funded programs that support early childhood activities. HHS's Child Care Bureau (CCB) provides block grants to states through the Child Care and Development Block Grant, commonly referred to as the Child Care and Development Fund (CCDF), to subsidize child care for low-income children while their parents work or participate in education or training activities. HHS's Office of Head Start funds local grantees through its Head Start program, a comprehensive program designed to foster healthy child and family development and to help low-income children achieve school readiness. States receiving CCDF block

grants and Head Start grantees have limited funds for these programs and employ priorities and waiting lists to ration services. In fiscal year 2006, CCDF provided approximately \$4.9 billion in federal funds to states and territories. In fiscal year 2004 (the latest year for which service delivery data were available), states and territories received about \$4.7 billion in federal funds and served approximately 1.74 million children in their CCDF programs. In fiscal year 2005, Head Start grantees received about \$6.8 billion in federal funding and served approximately 900,000 children. The majority of individuals with limited English proficiency are immigrants—individuals not born in the United States—although most children of immigrants were born in the United States. Children must be U.S. citizens or legal residents to receive CCDF subsidies, while a child's immigration status is not a factor in determining eligibility for Head Start. The parent's immigration status is not relevant for determining eligibility for either program.

Organizations working on issues affecting children and parents with limited English proficiency have raised concerns that these families may have difficulties accessing federally funded child care and early education programs. In this context, you asked us to answer the following questions: (1) What is known about the participation of children whose parents have limited English proficiency in child care and early education programs funded through CCDF and Head Start? (2) What challenges do these families face in accessing these programs? (3) What assistance is provided by selected state and local entities to facilitate access for these families? (4) What actions has HHS taken to ensure that these families can access CCDF child care subsidies and Head Start?

To address these issues, we used multiple data collection methodologies. To determine the participation in federally funded child care and early education programs by children of parents with limited English proficiency, we reviewed HHS data from a survey of Head Start participants and from a reporting system used by Head Start grantees. To assess the reliability of these data, we interviewed relevant HHS officials and contractors and reviewed documentation related to the procedures for collecting and analyzing these data. We found the Head Start survey data to be sufficiently reliable for the purposes of this report, and while we did not independently verify the data available through the reporting system, we found no evidence to suggest that they were unreliable. We also requested information from all 50 states and the District of Columbia on their collection of language data for CCDF subsidy recipients. To obtain information on the child care and early education patterns of these children that could not be obtained from HHS data, we analyzed national

survey data collected in 1998 as part of the Early Childhood Longitudinal Study, Kindergarten Class of 1998-99 (ECLS-K), from parents of kindergarten children about their children's experiences the year before. Specifically, we used a logistic regression model to estimate the effect of parents' English proficiency on children's child care and early education patterns, while controlling for selected individual and family characteristics such as race and parental education. ECLS-K, conducted by the National Center for Education Statistics (NCES), was the most recent national dataset that allowed us to examine child care and early education experiences of children while considering the English proficiency of their parents. We assessed the reliability of NCES data and found these data to be sufficiently reliable for the purposes of this report. To understand the challenges that parents with limited English proficiency face and what state and local entities are doing to assist them, we visited five states (Arkansas, California, Illinois, North Carolina, and Washington) and contacted 11 counties across these states. We interviewed state and local officials administering CCDF and Head Start as well as local child care and early education providers. We selected our site visit locations on the basis of the size and growth of their population with limited English proficiency, the presence of any initiatives focused on individuals with limited English proficiency, and their geographic location. We also conducted 12 focus groups in California, North Carolina, and Washington with mothers who spoke Spanish and Vietnamese, reported limited English proficiency, and had children aged 5 or younger enrolled in child care who likely qualified for CCDF subsidies based on their family's income and parental work and education activities. Six focus groups were conducted with mothers whose children received a government child care subsidy, and six focus groups were conducted with mothers whose children were eligible for but did not receive the subsidy. To determine what HHS is doing to ensure access to its programs, we interviewed HHS officials from the Office for Civil Rights (OCR), the Office of Head Start, and CCB, and reviewed relevant documents, legislation, guidance, and other federal resources related to language access. Appendix I contains more information about our scope and methodology. Appendix II contains information on the regression analysis of ECLS-K data that we conducted. We conducted our work between July 2005 and June 2006 in accordance with generally accepted government auditing standards.

Results in Brief

The most recent national survey data showed that in 1998, children of kindergarten age whose parents had limited English proficiency were less likely than other children to have received financial assistance from a social service or welfare agency for child care or to participate in Head

Start in the year before kindergarten, after controlling for selected individual and family characteristics such as race and parental education. Eighty-eight percent of these children were Hispanic, and the results differed between them and Asian children. However, these data could not be used to assess their likelihood of enrollment in CCDF programs because the survey questions did not ask for the specific agency providing financial assistance. Further, CCB did not have information on the total enrollment in CCDF programs of children of parents with limited English proficiency because it did not require states to collect and report any language data from parents of children receiving federal subsidies, such as their primary language or English proficiency. We found that 13 states collected some language data from parents whose children received CCDF subsidies, primarily to determine the need for interpreters or translated forms. However, these data had limitations that reduced their usefulness in assessing participation in CCDF programs by children of parents with limited English proficiency. For example, 5 states made the collection of language data by caseworkers optional, and state officials told us they could not guarantee that the information was consistently collected. The Office of Head Start collected some language data on the language spoken by Head Start participants, which showed that about 13 percent of parents of the approximately 900,000 children enrolled in Head Start in 2003 reported speaking English “not well” or “not at all.”

Focus group participants, state and local child care officials, and advocates told us that parents with limited English proficiency faced multiple challenges in accessing federally funded child care and early education programs for their children. Analysis of data from focus groups with mothers whose children were eligible for federal child care subsidies revealed that some of them were not aware of the programs. Parents also faced challenges during the application process, according to focus group participants and state and local officials interviewed. For example, some of them faced obstacles due to a lack of bilingual staff or translated applications, especially for languages other than Spanish. Additionally, parents reported difficulties communicating with their children’s English-speaking providers. Officials reported shortages of providers with the language ability to serve families with limited English proficiency. Parents’ immigration status also presented indirect challenges to the participation of children in federally funded child care and early education programs. For example, local officials and community advocates told us that some parents with limited English proficiency may be reluctant to apply for fear of exposing undocumented immigrant members in the household. Finally, some parents with limited English proficiency experienced challenges that were common to low-income families generally. For example, difficulty

finding care at nontraditional hours, lack of transportation, and the limited number of subsidized child care slots available affected the ability of these parents to access programs.

The majority of state and local agencies and providers that we interviewed on our site visits took some steps to assist parents with limited English proficiency, but officials reported challenges in serving these parents. In all counties that we visited, agencies offered some form of oral language assistance, although the scope of this assistance varied and parents continued to experience challenges when accessing services. For example, agencies in 5 of the 11 counties visited had staff that could speak several languages; agencies in the remaining counties had Spanish-speaking staff, although in one case, the staff were not specifically assigned to work with program applicants and had other responsibilities. Most agencies also made available some written language assistance, such as translated applications, although the scope of the translations varied as well. For example, local agencies in one state used applications that the state had translated into eight languages, while agencies in 2 other states had state-translated applications only in Spanish. The majority of agencies and providers also disseminated information in other languages to raise awareness of their programs and services. Several state and local agency officials told us that they did not extensively disseminate information about their programs because their programs were already operating at full capacity or had substantial waiting lists. Agencies in the majority of locations that we visited had initiatives to increase the supply of providers able to communicate effectively with parents. For example, one local agency we visited, which provided child care information to parents and worked with child care providers in the community, offered training and other guidance to Somali- and Russian-speaking women interested in opening family child care homes. State and local officials cited several challenges in serving parents with limited English proficiency, including difficulties hiring qualified bilingual staff and the expense of translating materials into multiple languages. Some officials that we interviewed expressed the need for additional information on cost-effective strategies to serve parents with limited English proficiency, and several officials said it would be helpful to learn about provider training in use elsewhere.

HHS provided a variety of assistance to grantees on serving children of parents with limited English proficiency, but gaps remained in its program review efforts. HHS's Office for Civil Rights conducted outreach to states to help them implement guidance on access to HHS programs by individuals with limited English proficiency and offered technical assistance in identifying appropriate language access strategies. The Office

of Head Start provided assistance to increase awareness of the Head Start program and to help grantees better serve children of parents with limited English proficiency. The Office also reviewed grantees' assessments of child care and early education resources in their communities relative to the needs of their communities' Head Start-eligible children. In addition, the Office conducted formal monitoring reviews of grantees' compliance with Head Start performance standards, including standards specific to providing language access to children and parents with limited English proficiency. An Office of Head Start official, however, told us that the office could not ensure that its review teams consistently reviewed grantee compliance with these standards, and in our prior work we found that no mechanism existed to ensure consistency in the monitoring process. CCB provided a variety of assistance to help states and child care providers offer language access to individuals with limited English proficiency, such as translating brochures. CCB officials told us that because CCDF is a block grant, CCB's oversight of CCDF is limited to reviewing states' CCDF plans and investigating complaints. However, CCB does not require states to report in their CCDF plans how they will provide language access for individuals with limited English proficiency or have a mechanism for ensuring that eligible children of parents with limited English proficiency are not inadvertently excluded from receiving CCDF assistance because of their parents' citizenship or immigration status.

To help agencies plan for and provide language assistance to parents with limited English proficiency who may want to access federally funded child care and early education programs for their children, we recommend that HHS work with states to help them explore cost-effective strategies for collecting data on CCDF subsidy recipients' language preference or English proficiency. Once these data are available, HHS may consider collecting information on existing cost-effective ways that agencies could use to provide language assistance and to recruit providers who speak other languages, as well as disseminating this information in the locations where the data show the greatest need. To provide opportunities for eligible children to receive federal child care subsidies regardless of their parents' English proficiency, we recommend that HHS develop and implement specific strategies to review whether and how states provide access to CCDF programs for these families. These strategies include the revision of the CCDF plan template to require states to report on how access will be provided and a systematic review of states' eligibility criteria to ensure that states comply with HHS policies related to participation of children whose parents have limited English proficiency.

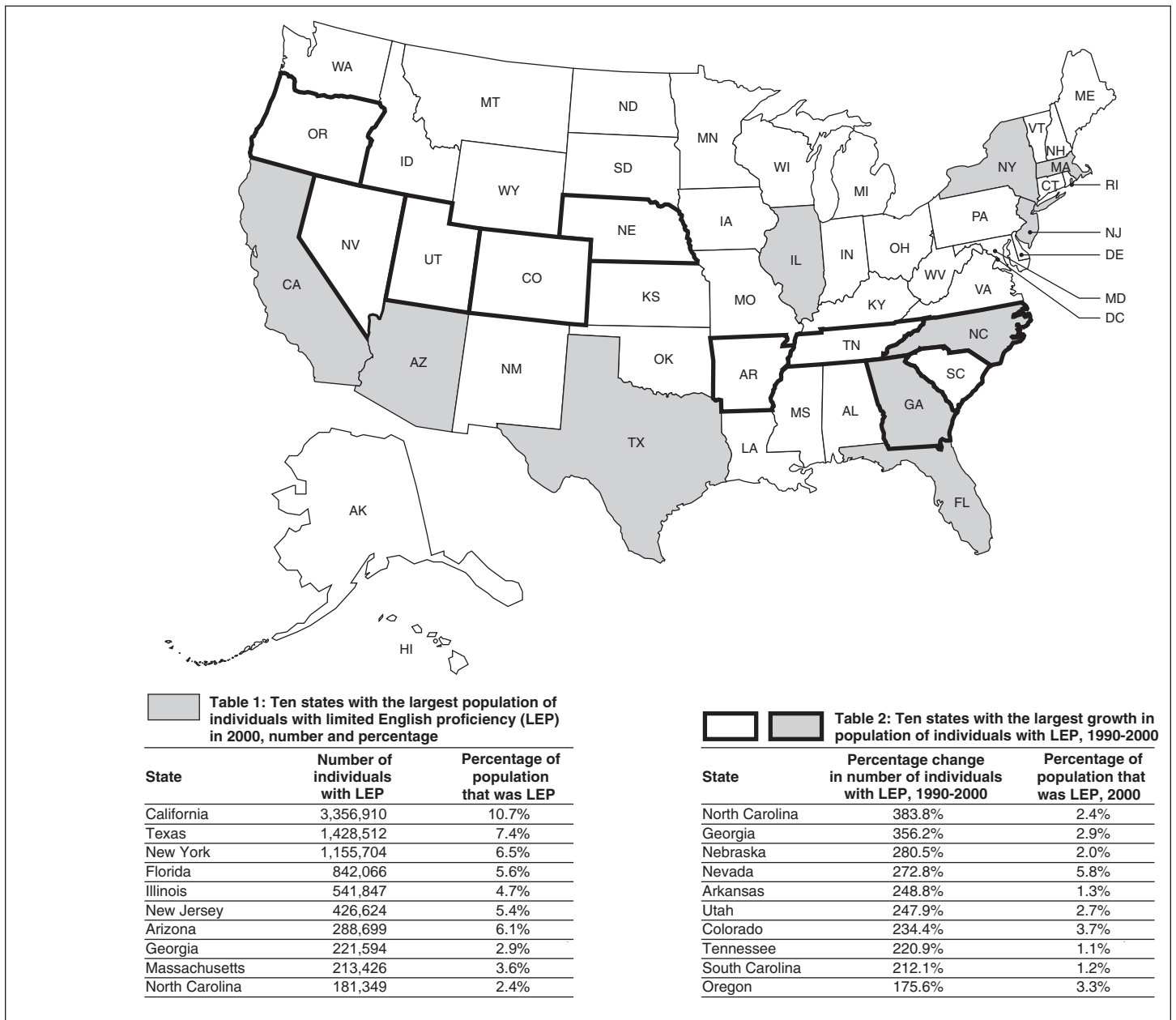
In its comments on a draft of this report, HHS's Administration for Children and Families (ACF) generally agreed with our recommendation to help states explore strategies for collecting data on CCDF subsidy recipients' language, and provided additional information on its plans and actions toward implementation of this recommendation. ACF also agreed to examine the feasibility of using the CCDF plan template to ask states to report on how they provide access to parents with limited English proficiency seeking CCDF subsidies for their children. However, ACF did not address our recommendation that it systematically review states' program eligibility criteria to ensure that states do not inadvertently exclude otherwise eligible children of parents with limited English proficiency from CCDF participation. In addition, ACF submitted detailed comments on certain aspects of this report, including comments related to our analysis of ECLS-K data.

Background

Population Changes

The population of individuals with limited English proficiency in the United States has grown dramatically in recent years. The 2000 Census shows that the number of people reporting that they do not speak English well or very well grew by 65 percent, from 6.7 million in 1990 to almost 11 million in 2000. The data also show that while growth in the population of individuals with limited English proficiency continues in states along the border, such as California and Texas, it is most rapid in other states. (See fig. 1.)

Figure 1: Size and Growth of Population of Individuals with Limited English Proficiency, 1990-2000



Sources: GAO analysis of U.S. Census data. Copyright Corel Corp. All rights reserved (map).

Note: In our analyses of Census data, we categorized the population of individuals reporting that they do not speak English well or very well as those with limited English proficiency.

As figure 1 shows, for example, the number of individuals who did not speak English well or very well increased by more than 300 percent between 1990 and 2000 in North Carolina and Georgia, and by more than 200 percent in states such as Nebraska, Arkansas, and South Carolina. In 2000, 14 percent of children age 5 and younger in households below the federal poverty level lived in linguistically isolated households.¹

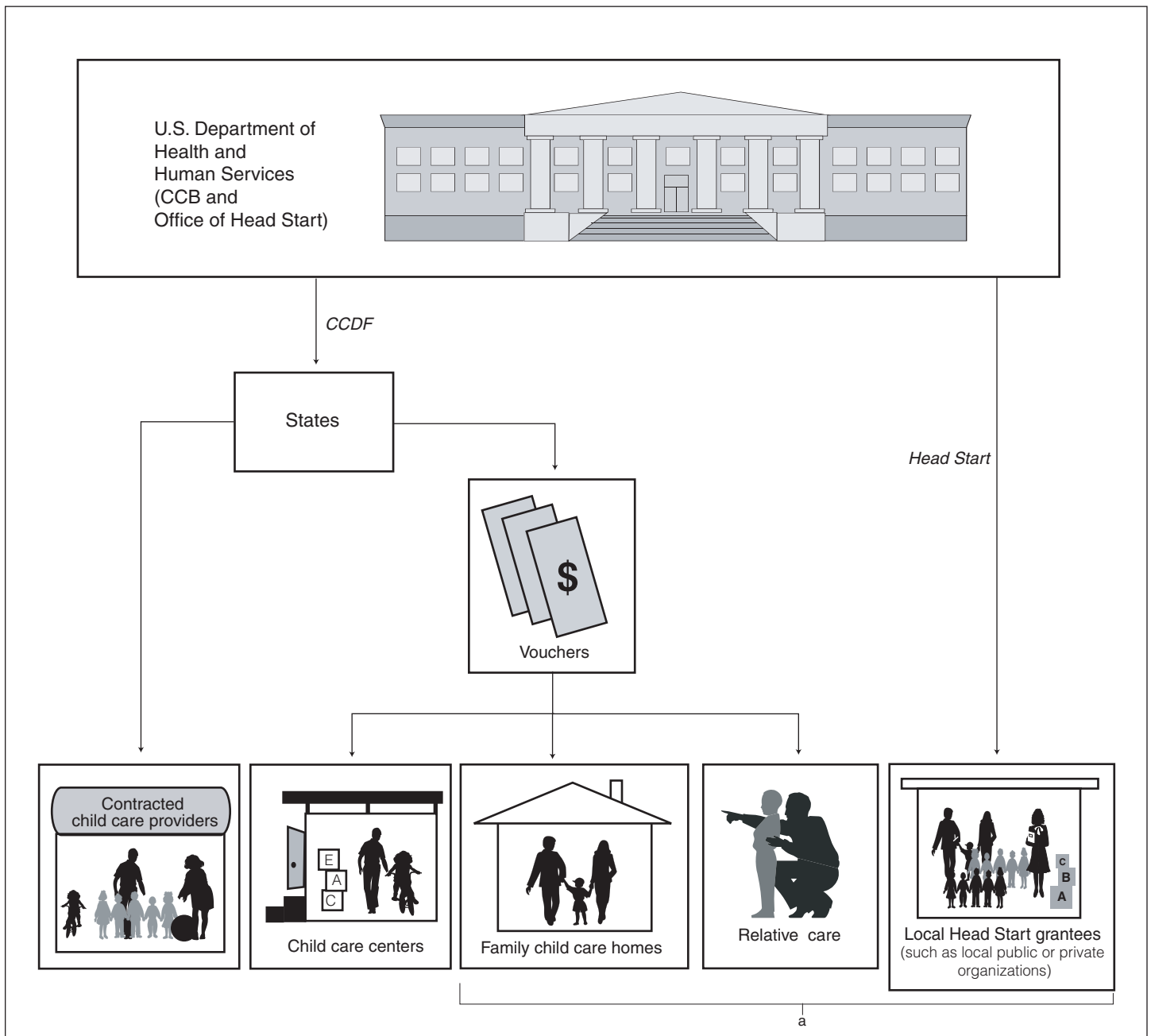
HHS Child Care and Early Education Programs

The two largest sources of federal support for child care and early education are CCDF and Head Start. CCB administers CCDF and the Office of Head Start² administers Head Start. Both entities are housed within ACF. CCB provides block grants to states through CCDF to subsidize child care expenses of eligible families. In contrast, the Office of Head Start awards grants for the operation of Head Start programs directly to local public or private organizations, school systems, or Indian tribes. The flow of funds under CCDF and Head Start is shown in figure 2.

¹The U.S. Census defines a “linguistically isolated household” as one in which no person aged 14 or over reported either speaking only English at home or speaking English very well.

²In June 2006, the Head Start Bureau was officially renamed the Office of Head Start.

Figure 2: Flow of Funds Under CCDF and Head Start



Source: GAO analysis and Art Explosion images.

^aThese are examples of providers that parents may choose with CCDF vouchers. Parents may choose any other legally operating provider authorized by the state.

CCDF is used to subsidize the child care expenses of low-income families with children under age 13 and to improve the overall quality and supply of child care. The goals of the program are to (1) allow each state maximum flexibility in developing child care programs and policies; (2) promote parental choice to empower working parents to make their own decisions on the child care that best suits their family's needs; (3) encourage states to provide consumer education information to help parents make informed choices about child care; (4) assist states to provide child care to parents trying to achieve independence from public assistance; and (5) assist states in implementing the health, safety, licensing, and registration standards established in state regulations. The parent whose child receives child care assistance may either enroll the child directly with a provider who has a grant or contract from the state for the provision of child care services or receive a certificate to enroll the child with a provider of the parent's choosing. Parents may choose from any child care legally offered in the state, which could include care provided in child care centers, family child care homes, or by relatives or nonrelatives in the child or provider's home. CCDF is a combination of discretionary and mandatory funds. In federal fiscal year 2006, CCDF provided about \$4.9 billion in federal funds to states and territories. In fiscal year 2004 (the latest year for which data were available), the program served approximately 1.74 million children with federal funding of about \$4.7 billion. In addition, federal CCDF funds are supplemented with state contributions, and HHS officials reported that total federal and state expenditures for CCDF amounted to almost \$9.4 billion in fiscal year 2004.

Congress gave states considerable flexibility in administering and implementing their CCDF programs. States are required to submit biennial plans to CCB describing their CCDF activities. States determine income eligibility thresholds up to a federal maximum of 85 percent of the state median income. In their CCDF plans for federal fiscal years 2004 and 2005, almost all states reported setting lower income eligibility limits, with only 5 states at the federal maximum of 85 percent.³

Because CCDF is a nonentitlement program—one with limited funding and not necessarily intended to cover all eligible persons—states are not required to provide child care subsidies to all families whose incomes fall below the state-determined eligibility threshold, and states may establish

³National Child Care Information Center, "Trends in State Eligibility Policies: A CCDF Issue Brief," Vienna, Virginia, July 2004.

priorities for serving eligible families, such as prioritizing families receiving Temporary Assistance for Needy Families (TANF), in order to support their work efforts. States can augment their CCDF funds with other funding sources, such as TANF, to increase funding available for subsidies. States spent \$1.4 billion in federal TANF funds directly on child care in fiscal year 2004.⁴ States may also transfer up to 30 percent of their TANF block grants into their CCDF programs. In fiscal year 2004, the latest year for which data were available, \$1.9 billion in TANF funds was transferred to CCDF. Funds transferred from TANF to CCDF must be spent in accordance with CCDF rules. This is significant partly because the effect of the child's or the parent's citizenship or immigration status on the child's eligibility differs depending on the program. For example, parents' immigration status may affect their eligibility for child care assistance under TANF,⁵ whereas only the immigration status of the child matters for determination of eligibility for subsidies from CCDF. Although legislation authorizing CCDF did not specify the effect of citizenship or immigration status on program eligibility, HHS's guidance to state agencies indicated that states should consider only the citizenship and immigration status of the child when determining the child's eligibility for federal child care assistance.⁶ Therefore, children who are citizens or legal residents are eligible for CCDF subsidies regardless of their parents' citizenship or immigration status.

States are also required to dedicate at least 4 percent of their CCDF allotments to activities to provide comprehensive consumer education to

⁴Partly as a condition of receiving federal funds, states also used their own funds for this purpose. According to HHS, this brought total federal and state child care expenditures under TANF to about \$3.4 billion in fiscal year 2004.

⁵The Personal Responsibility and Work Opportunity Reconciliation Act, (PRWORA, Pub. L. No. 104-193) restricts access by some legal immigrants to certain programs and denies access by illegal immigrants to many government-funded programs. States can decide the eligibility for TANF of most of the qualified aliens who arrived in this country prior to August 22, 1996. Most of the qualified aliens who entered the United States on or after August 22, 1996 are barred from receiving TANF the first 5 years after their entry, although some states choose to provide their own state-funded public assistance to such immigrants.

⁶The guidance states that "for implementing the verification requirements mandated by title IV of PRWORA, only the citizenship and immigration status of the child, who is the primary beneficiary of the child care benefit, is relevant for eligibility purposes." U.S. Department of Health and Human Services, Administration on Children, Youth, and Families. Log No. ACYF-PI-CC-98-08, November 25, 1998.

parents and to improve the quality and availability of child care.⁷ States may use some of this quality set-aside to fund child care resource and referral services that are available in every state and most communities in the United States. These agencies provide information to parents on finding and paying for quality child care, offer training to child care providers, and frequently engage in efforts to analyze and report on child care supply and demand in their communities. Often, resource and referral agencies also manage the CCDF subsidy program or are part of local organizations that administer the subsidy in the community.

Head Start offers child development programs to low-income children through age 5 and their families. The overall goal of Head Start is to promote the school readiness and healthy development of young children in low-income families. In addition to providing classroom programs for the children, Head Start grantees provide or arrange for a variety of services, including medical, dental, mental health, nutritional, and social services. Children in families with incomes below the federal poverty level (\$20,000 for a family of four in 2006)⁸ are eligible for available Head Start programs regardless of their or their parents' immigration status. Head Start grantees must adhere to certain performance standards, including standards related to providing language access in Head Start programs. The Office of Head Start reviews the performance of Head Start grantees on these standards using a structured guide known as the Program Review Instrument for Systems Monitoring (PRISM). In fiscal year 2005, Head Start was funded at \$6.8 billion and served 906,993 children.

Ensuring Meaningful Program Access for Persons with Limited English Proficiency

HHS has responsibility for monitoring grantees' compliance with program requirements. Through its Office for Civil Rights (OCR), HHS also oversees compliance with Title VI of the Civil Rights Act of 1964,⁹ which states that no person shall "on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected

⁷In addition to the minimum 4 percent quality set-aside, annual appropriations have provided funding for child care quality activities. HHS officials noted, for example, that the agency's 2006 fiscal year appropriation provided approximately \$270 million for quality improvement activities, including nearly \$100 million to improve the quality of infant and toddler care and approximately \$10 million for child care research and evaluation initiatives.

⁸*Federal Register*, Vol. 71, No. 15, January 24, 2006, pp. 3848-3849. Alaska and Hawaii have higher guidelines.

⁹42 U.S.C. § 2000d *et. seq.*

to discrimination under any program or activity receiving federal financial assistance.” HHS has issued regulations to recipients of HHS funds on implementing the provisions of Title VI, including requiring an assurance in every application for federal financial assistance that the program will be operated in compliance with all requirements imposed under HHS’s Title VI regulations.

Moreover, Executive Order 13166, issued in 2000, required federal agencies to prepare a plan and issue guidance to their funding recipients on providing meaningful access to individuals who, as a result of national origin, are limited in their English proficiency. In August 2003, HHS published revised guidance pursuant to Executive Order 13166. The guidance states that Title VI and its implementing regulations require that grantees take reasonable steps to ensure meaningful access for individuals with limited English proficiency, and the guidance is intended to assist grantees in fulfilling their responsibilities to ensure meaningful access to HHS programs and activities by these individuals. Under the guidance, grant recipients are to determine the extent of their obligation to provide language assistance services by considering four factors: (1) the number or proportion of individuals with limited English proficiency eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which these individuals come in contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people’s lives; and (4) the resources available to recipients of federal funds and costs of language assistance. The guidance states that grantees have two main ways to provide language assistance services: oral interpretation, either in person or via telephone, and written translation. Finally, the guidance lays out elements of an effective plan of language assistance for persons with limited English proficiency.

Monitoring compliance with Title VI and providing technical assistance are functions of HHS’s OCR. OCR enforces Title VI as it applies to agencies’ responsibilities to ensure access for individuals with limited English proficiency. The mechanisms available to OCR for ensuring that agencies comply with their obligations to provide access include complaint investigations, compliance reviews, efforts to secure voluntary compliance, and technical assistance.

Children of Parents with Limited English Proficiency Were Less Likely than Other Children to Participate in Subsidized Programs

The most recent national survey data showed that in 1998 children of parents with limited English proficiency, 88 percent of whom were Hispanic, were less likely than other children to receive financial assistance from a social service or welfare agency for child care or to participate in Head Start in the year before kindergarten, after controlling for selected individual and family characteristics. However, these data could not be used to assess their likelihood of enrollment in CCDF programs because the survey questions did not ask for the specific agency providing financial assistance. Further, CCB did not have information on the total enrollment in CCDF programs of children of parents with limited English proficiency because it did not require states to collect and report any language data from parents of children receiving federal subsidies, such as their primary language or English proficiency. The Office of Head Start collected some data on the language spoken by Head Start participants, which showed that about 13 percent of parents of the approximately 900,000 children enrolled in Head Start in 2003 reported speaking English “not well” or “not at all.”

Children of Parents with Limited English Proficiency Were Less Likely to Receive Financial Assistance for Child Care or to Participate in Head Start

National survey data from ECLS-K showed that in 1998, kindergarten children of parents with limited English proficiency who were in nonparental child care in the previous year were less likely¹⁰ than other children in child care to receive financial assistance from a social service or welfare agency for that care, after controlling for selected individual and family characteristics.¹¹ However, parents’ limited English proficiency had a different effect for Hispanics than for Asians in the dataset.¹² Specifically, as shown in figure 3, Hispanic children of parents with limited English proficiency (who represented 88 percent of all children in the

¹⁰All differences reported were statistically significant at the 95 percent confidence level unless otherwise noted. This means that if no difference actually existed in the population, we would only expect to find a difference as large as the one found in the ECLS-K sample less than 5 percent of the time.

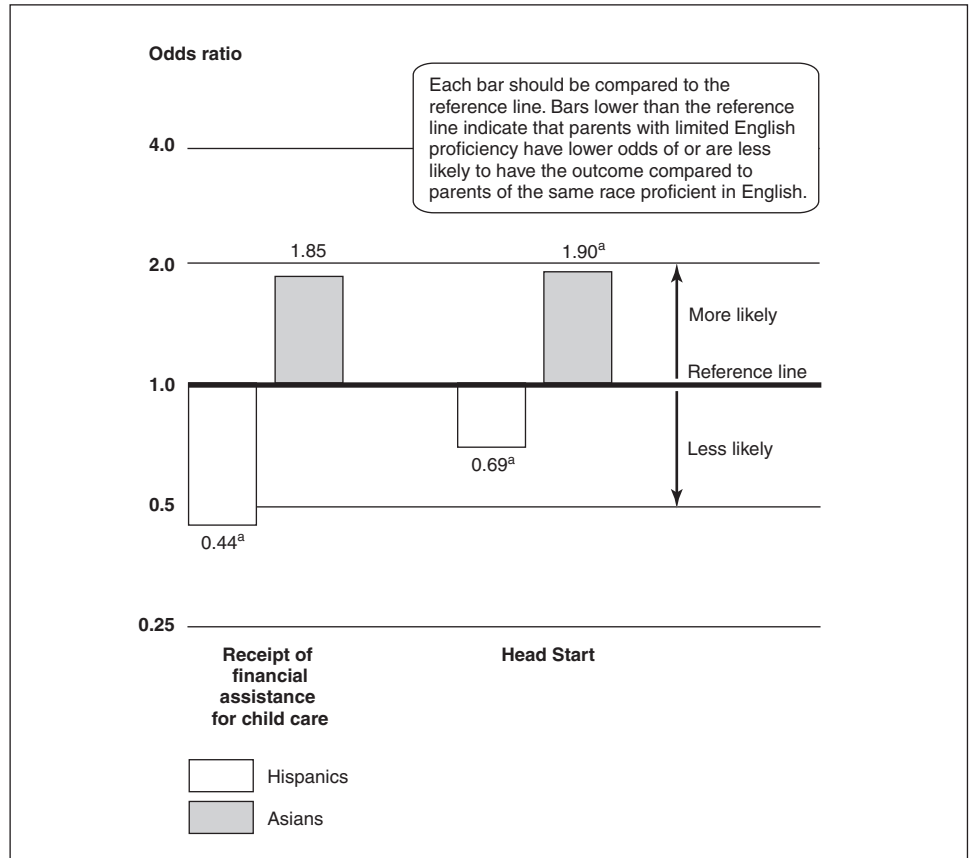
¹¹The characteristics we controlled for in the analysis of the receipt of financial assistance for child care were race, household income and parental education, the number of individuals over 18 in the household, the presence of a parent who was not working, whether care was provided in a center-based facility, whether the child was in multiple types of care, and the child’s participation in Head Start. In our analysis, we treated receipt of center-based care and Head Start participation as two distinct outcomes.

¹²Our analysis was limited to Hispanics and Asians because the numbers of parents with limited English proficiency in other racial or ethnic categories in the survey were too small to allow the same analysis.

dataset whose parents had limited English proficiency) were less likely than children of Hispanic parents proficient in English to receive financial assistance for their care. Among Asians, who constituted about 8 percent of all children of parents with limited English proficiency, we did not find a statistically significant difference in the receipt of financial assistance for child care between children of parents with limited English proficiency and other children. These results, however, cannot be used to draw conclusions about enrollment in CCDF programs by children of parents with limited English proficiency because the survey questions referred to assistance from a social service or welfare agency generally and did not ask specifically whether assistance came from CCDF.¹³ Also, while ECLS-K data are representative of the experiences of children in the year prior to entering kindergarten, they cannot be extrapolated to children of all ages. (See app. II for discussion of the methodology we used to analyze ECLS-K data and the results of our analyses.)

¹³We also examined differences in the likelihood of being in any type of nonparental child care in general and in center-based care in particular in the year before kindergarten. We found that, among Hispanics, children of parents with limited English proficiency were less likely to have been in nonparental child care than other children. We did not find a significant difference in the use of nonparental child care among Asians, nor did we find a significant difference in the use of center-based care for either Hispanics or Asians.

Figure 3: Relative Odds of Selected Outcomes for Children of Parents with Limited English Proficiency Compared to Children of Parents Proficient in English, for Hispanics and Asians, after Adjusting for Selected Family Characteristics



Source: GAO analysis of ECLS-K data.

Note: The numbers in this figure show how the odds of having a certain outcome compare among children whose parents have limited English proficiency and other children of the same race. For example, among Hispanics, children of parents with limited English proficiency were less than half as likely (0.44 times) to receive financial assistance for their care than other children.

^aIndicates that children of parents of that racial or ethnic group and with limited English proficiency had statistically significantly different odds (at the 95 percent level) of having that outcome compared to children of parents proficient in English of the same race.

Our analysis of ECLS-K data also indicated that after controlling for selected individual and family characteristics,¹⁴ children of parents with

¹⁴The characteristics we controlled for in the analysis of the use of Head Start were race, household income and parental education, number of individuals over 18 in the household, and the presence of a parent who was not working.

limited English proficiency were less likely to participate in Head Start in the year before kindergarten. Again, this result did not hold consistently across racial and ethnic groups. Specifically, as shown in figure 3, children of Hispanic parents with limited English proficiency were less likely than children of Hispanic parents proficient in English to participate in Head Start in the year before kindergarten. In contrast, children of Asian parents with limited English proficiency were more likely than children of Asian parents proficient in English to participate in Head Start.

While 1998 ECLS-K data showed that children of parents with limited English proficiency were less likely than other children to receive financial assistance for child care and to participate in Head Start in the year before kindergarten, it cannot be concluded from these data alone that the differences are due to language barriers in access to programs. Other factors, such as the availability of child care and early education programs in the areas in which members of different language groups reside or access to support networks that provide information about available programs may also explain this result. In addition, since the time of the survey, HHS has taken steps to increase the participation of minorities and children of parents of parents with limited English proficiency, such as translating CCDF program brochures and undertaking initiatives to raise awareness of the Head Start program in the Spanish-speaking community. Furthermore, HHS officials reported substantial increases in federal and state child care funding since ECLS-K data had been collected, suggesting that these increases may have increased program access for parents of children with limited English proficiency.¹⁵ However, neither CCB nor the Office of Head Start has more recent information on whether children whose parents had limited English proficiency are more likely to access financial assistance for child care and Head Start relative to children whose parents are proficient in English.¹⁶ ECLS-K was the most recent national dataset that allowed us to examine the receipt of financial assistance for child care and the participation in Head Start by children of

¹⁵As mentioned earlier, ECLS-K collected information on the receipt of financial assistance for child care generally (rather than the receipt of CCDF subsidies specifically). Therefore, while the ECLS-K data show that children of parents with limited English proficiency were less likely to receive financial assistance for child care, these data cannot be used to comment on the accessibility of a specific program such as CCDF.

¹⁶According to an Office of Head Start official, there has been an increase in the number of linguistically and culturally diverse children and families served by Head Start in recent years. However, this increase could result from the increase of the population of such children and families in the United States generally.

parents with limited English proficiency in relation to the participation of similar children whose parents are proficient in English.

CCB Does Not Collect Language Data on Children Receiving CCDF Subsidies, and the Data in the 13 States that Collect Them Have Limitations

While CCB requires that states submit a variety of demographic information in monthly or quarterly reports, such as information on the race and ethnicity of CCDF subsidy recipients, it collects no information on the language spoken by or the English proficiency of parents whose children receive CCDF subsidies. CCB officials told us that they had no plans to collect language data for those receiving CCDF subsidies because they generally collect only information specifically listed in the legislation authorizing CCDF. A CCB official with responsibility for the demographic data collected from states and officials from 1 state we visited told us that requiring states to provide language data would create difficulties for states, such as developing ways to identify individuals with limited English proficiency. Despite the potential difficulties, various state and local officials in states that do not collect this information, including the official who cited potential difficulties collecting the data, told us that having such data would help them evaluate program performance.

While data on the receipt of CCDF subsidies were not available nationally, 13 states collected some language data from parents whose children receive CCDF subsidies.¹⁷ The specific type of data collected and the manner in which these data were collected varied among these 13 states, preventing comparisons among them on the extent to which state CCDF programs were serving children of parents with limited English proficiency. Officials in 10 of the 13 states that collected language data told us that their states used the data either to provide translated forms or interpreters to clients during the application process or for planning or program evaluation purposes, such as identifying areas with significant increases in the number of individuals with limited English proficiency and to determine the need for bilingual staff. State data, however, had limitations that decreased their usefulness in assessing participation in CCDF programs by children of parents with limited English proficiency. For example, 5 states made the collection of language data by caseworkers optional, and officials in another 5 states told us that despite requiring caseworkers to collect the language data, compliance with the data

¹⁷Two of the 5 states that we visited reported collecting their own language data from clients. In addition, we surveyed the remaining 45 states and the District of Columbia, and 11 of the 41 states responding to our e-mail requests for information reported collecting these data.

requirements could not always be guaranteed. Officials in 8 of the 13 states that collected language data told us that they could benefit from having more information on the collection or use of language data or from learning how other states collect or use them.

Head Start Data Indicate That about One-Eighth of Participating Children Have Parents with Limited English Proficiency

The Office of Head Start collected some language data from the approximately 900,000 children enrolled in Head Start and their parents from two sources. First, the Office of Head Start interviewed parents through its Family and Child Experiences Survey (FACES), a series of longitudinal surveys of nationally representative samples of children in Head Start. Based on the 2003 parent interviews administered, FACES data showed that about 20 percent of parents of 3- and 4-year-old children in Head Start¹⁸ reported that a language other than English was most frequently spoken at home, and about 13 percent of parents reported that they spoke English “not well” or “not at all.”¹⁹ Second, the Office of Head Start collected demographic information on all 4- and 5-year-old children in Head Start²⁰ through its National Reporting System (HSNRS), including information on the child’s primary language. These data showed that about one-quarter of children enrolled in Head Start in Spring 2005 had a primary language other than English.²¹

¹⁸According to HHS, 3- and 4-year-olds constituted 87 percent of children enrolled in Head Start during the 2002-2003 program year. (See <http://www.acf.hhs.gov/programs/hsb/research/2004.htm>.)

¹⁹While this number appears similar to the percentage of children aged 0 to 5 in low-income families that were in linguistically isolated households as reported in Census 2000 (14 percent), the two cannot be directly compared because they were collected in different years and because the definition of limited English proficiency we used in analyzing the information from FACES is different from the Census definition of a linguistically isolated household.

²⁰According to HHS, 4- and 5-year-olds constituted 58 percent of children enrolled in Head Start during the 2002-2003 program year. (See <http://www.acf.hhs.gov/programs/hsb/research/2004.htm>.)

²¹The Office of Head Start also surveys grantees annually through its Program Information Report (PIR). The PIR asks grantees to report a variety of demographic information about children enrolled in their programs, including the primary language of the family at home, but not their need for language assistance. However, our prior work identified limitations of PIR data. See GAO, *Head Start: Better Data and Processes Needed to Monitor Underenrollment*, [GAO-04-17](#) (Washington, D.C.: Dec. 4, 2003), and GAO, *Head Start: Comprehensive Approach to Identifying and Addressing Risks Could Help Prevent Grantee Financial Management Weaknesses*, [GAO-05-176](#) (Washington, D.C.: Feb. 28, 2005.)

Parents with Limited English Proficiency Faced Multiple Challenges That May Have Limited Their Children's Participation in Federally Funded Child Care and Early Education Programs

Results from our focus groups, which were composed of mothers with limited English proficiency whose children were eligible for federal child care subsidies, revealed that some participants were unaware of the various federal child care and early education programs that may be available to them. Parents with limited English proficiency also faced challenges in the process of applying for programs and financial assistance, such as lack of interpreters and translated materials. They also encountered difficulties communicating with English-speaking child care providers. Some of the challenges to program access that these parents faced were the same challenges that many low-income families face, including difficulty finding care at nontraditional hours, lack of transportation, and the limited availability of subsidized child care slots.

Lack of Program Awareness and Challenges during the Application Process May Have Limited Program Participation

Many parents with limited English proficiency were unaware of child care assistance available to them. All six of the focus groups with Spanish-speaking and Vietnamese-speaking mothers who were eligible but not receiving subsidies revealed that the majority were unaware of the assistance available. In addition, the mothers that we interviewed in Arkansas and focus group participants in North Carolina also told of misunderstandings and myths that some parents had regarding the consequences of participating in government-funded programs. For example, they had heard rumors that if they applied for child care assistance, their child might one day be drafted into the armed forces to repay the assistance they received.

Shortages of bilingual staff also presented challenges to parents with limited English proficiency applying for subsidies for their children. State and local officials and providers that we interviewed identified the availability of bilingual staff as a factor that played a role in the ability of parents with limited English proficiency to apply for the subsidies. For example, subsidy administration officials in one rural county told us that they sometimes had to ask clients to come back because no staff were available to assist them in their language. In three of the four focus groups with Spanish-speaking mothers with subsidies, those who generally found the subsidy application process to be easy cited the availability of bilingual case workers as a factor in allowing them to apply for assistance successfully.

In addition to shortages of bilingual staff, the lack of available translated materials also presented challenges to parents with limited English

proficiency. Some programs did not have application forms translated into other languages, and local officials and parents expressed concerns about the quality of existing translated materials, saying that they were often translated by volunteers and that no quality checks were done. For example, one community group representative told us that volunteers had translated the Spanish forms that the local subsidy administration office used and that no quality controls had been applied, resulting in materials of such poor quality that she advised parents not to request the Spanish version of the application.

These challenges may be more acute for individuals with limited English proficiency who speak languages other than Spanish. Local officials in three states reported that there were limited services available in languages other than Spanish. For example, local officials in Washington said that services to smaller, more diverse populations, such as African, Asian, and East Indian language speakers, were more limited. In North Carolina and California, local officials also reported that services for populations such as the Hmong were more limited than for English or Spanish speakers.

Finally, although immigration status has no impact on Head Start eligibility and only the immigration status of the child is relevant to the determination of eligibility for CCDF subsidies, it nonetheless created indirect challenges for some children of parents with limited English proficiency. Local officials and community advocates told us that citizen children of parents with limited English proficiency might not participate in federal child care and early education programs because of fear within the family of exposing undocumented immigrant members in the household. Several officials told us that some of these families were reluctant to provide personal information and were inhibited from applying because of fear about how their personal information might be used. In one case, we discovered a state that improperly required a declaration of satisfactory immigration status for every member of the household in order to apply for federally funded child care subsidies, thereby potentially excluding some children who are U.S. citizens and otherwise eligible for subsidies. Officials in two states also told us that many parents with limited English proficiency were paid in cash, making it difficult to verify their income for eligibility purposes.

Parents with Limited English Proficiency Had Difficulties Communicating with Providers

Parents reported difficulties communicating with their children's providers, and officials reported shortages of providers with the language ability to serve families with limited English proficiency. For example, officials at one local resource and referral agency that we visited in the county with the most Spanish speakers in the state told us that providers in the county did not have the capacity to meet the needs of families with limited English proficiency. Spanish-speaking mothers that we interviewed during a site visit to another state complained that some programs advertise themselves as bilingual when in reality they are not. Parents in focus groups also expressed concern about their ability to communicate with their child care providers. Local officials in one urban area that we visited said that among the primary challenges faced by families with limited English proficiency was the effect of the language barrier on the parents' ability to communicate with their child care providers. They stated this also made it difficult to ensure the same level of parent-provider interaction for families with limited English proficiency as for other families. For example, one provider with no bilingual staff said that she had a child with a disability in her center whose parents were limited in their English proficiency, making it difficult for staff to communicate with the parents about the child's needs. These communication difficulties had consequences in the classroom as well. For example, one Head Start provider reported instances of therapists and educators who were not trained to work with Hispanic families inaccurately assessing the needs of children with language or cultural differences.

Low-Income Parents with Limited English Proficiency Faced Some of the Same Challenges to Program Access as Other Low-Income Families

Low-income parents with limited English proficiency faced some of the same challenges when attempting to access child care and early childhood education programs as other low-income families. Across all states visited, state and local officials as well as providers said that many low-income families, especially families with limited English proficiency, work nontraditional hours and have difficulty finding care that meets their needs. For example, a resource and referral agency official in one rural community said that the first shift at a local employer begins at 5:30 a.m., while most providers do not offer care before 6:00 a.m., and employees working second and third shifts face even more difficulty finding child care. Lack of transportation, especially in rural communities, also restricts the child care options available to low-income families. Officials said that it can be especially difficult for families with limited English proficiency to navigate public transportation or call transit agencies for assistance. In a

previous report, we found that lack of English skills reduced individuals' ability to access public transportation systems.²²

Parents in some communities also faced shortages of child care and child care subsidies, especially for infants and toddlers. Officials with resource and referral agencies and local subsidy administration offices in 6 of the 11 counties that we contacted said that there were shortages of infant care in their communities. In addition, because funding for CCDF subsidies was limited, not all states provided subsidies to all families who applied and met eligibility criteria. Our prior work showed that 20 states did not serve all families who met state-determined eligibility criteria,²³ and three of the five states that we visited (Arkansas, California, and North Carolina) had waiting lists for CCDF subsidies. In five of the eight focus groups with Spanish-speaking mothers (including both those receiving and not receiving subsidies), participants identified waiting lists as one of the difficulties they faced when seeking assistance for child care. In the two other states that we visited (Illinois and Washington), state officials said that although they did not maintain waiting lists, they spent all of the funds available to them for CCDF subsidies. To manage demand for the limited financial assistance available for child care, states took steps such as giving priority to certain groups. For example, in the three states we visited that maintained waiting lists, two (Arkansas and North Carolina) set priorities for eligible families, such as preferences for families on or coming off of TANF. In the third, California, families on or transitioning off of TANF were provided child care assistance through a guaranteed funding stream, while funding for other low-income families was capped. Officials in California told us that this system made it extremely difficult for low-income families that were not in the TANF system to receive subsidized child care. While prioritization of TANF families would affect all low-income families, it may have additional implications for some children of parents with limited English proficiency. Census 2000 data show that 82 percent of individuals with limited English proficiency are foreign-born, and since immigration status is a factor in TANF eligibility, children of immigrants who do not qualify for TANF would be less likely to receive CCDF subsidies in those states that give priority to TANF families. In 2005, we found that 17 of 20 states not covering all applicants who

²²See GAO, *Transportation Services: Better Dissemination and Oversight of DOT's Guidance Could Lead to Improved Access for Limited English-Proficient Populations*, [GAO-06-52](#) (Washington, D.C.: Nov. 2, 2005).

²³See [GAO-05-667](#).

otherwise met the eligibility criteria gave TANF families priority for CCDF funds,²⁴ consistent with CCDF's goal of providing child care to parents trying to become independent of public assistance.

Selected Agencies Took Some Steps to Assist Parents with Limited English Proficiency but Reported Challenges in Serving Them

The majority of state and local agencies and providers that we visited took some steps to assist parents with limited English proficiency in accessing child care and early education programs for their children. Most agencies provided some oral and written language assistance, although the scope of the assistance varied. Most agencies also implemented initiatives to increase the supply of providers able to communicate effectively with parents. Officials told us that they faced several challenges in providing services to parents with limited English proficiency. Some state and local officials indicated that additional information on cost-effective strategies used by others to serve this population would facilitate their efforts to provide access.

Selected State and Local Agencies Offered Language Assistance

The majority of the agencies that we visited had taken some steps to provide oral and written language assistance, such as interpreters and translated materials, to parents with limited English proficiency. In all 11 counties that we contacted, the local offices administering CCDF subsidies and providing resource and referral services offered some oral language assistance to clients with limited English proficiency although the scope of the assistance varied. In 5 of these counties, agencies had staff that could speak several languages, a fact that officials said reflected the community they served. In the other 6 counties, agency staff had bilingual capacity for Spanish only, but officials said the vast majority of the individuals with limited English proficiency they served were Spanish-speaking. Although the subsidy administration office in one of these 6 counties had bilingual Spanish-speaking staff, these staff were not specifically assigned to work with individuals applying for CCDF subsidies but were clerical workers with other responsibilities. In most counties visited, child care and Head Start centers had bilingual staff to help parents with limited English proficiency enroll their children in the programs. For example, an official in one child care center that we visited where the majority of the families spoke Spanish said that all staff responsible for enrolling families in the program spoke Spanish.

²⁴See GAO, *Child Care: Additional Information Is Needed on Working Families Receiving Subsidies*, [GAO-05-667](#) (Washington, D.C.: June 29, 2005).

Several agencies that we visited also used telephone interpretation services to provide oral assistance to clients with limited English proficiency.²⁵ For example, the subsidy administration offices that we visited in Washington primarily used a state-contracted telephone language line that connected agency staff with bilingual telephone operators who could offer interpreting assistance in a language spoken by the client. In an effort to help local agencies serve clients with limited English proficiency in a cost-effective manner, North Carolina was in the process of entering into a contract for a language line that would allow local social service agencies, including those administering CCDF subsidies, to provide oral language assistance to clients if bilingual staff were not available on-site. A state official told us that once the contract is awarded, the state will make the service available to all local social service agencies at a reduced cost.

Several agencies also coordinated with one another to share resources for offering oral language assistance. For example, to help interpret for their Russian-speaking clients, a resource and referral agency in California with language capacity in Cantonese and Mandarin coordinated with staff at another nearby resource and referral agency that had language capacity in Russian. Subsidy administration officials in one rural county that we visited told us that the local hospital had a contract for the language line and they coordinated with the hospital to make use of that service. However, we did not find efforts to coordinate language assistance strategies among agencies in some locations visited, and agency officials in a few locations said that they could not always provide oral language assistance to clients with limited English proficiency on their own.

The majority of agencies that we visited provided written language assistance, such as translated subsidy application forms. Seven of the 11 subsidy administration offices contacted had subsidy applications translated into Spanish. Local agencies in Washington, California, and Illinois had applications that had been translated by the state. Washington required its application for the child care subsidy to be translated into

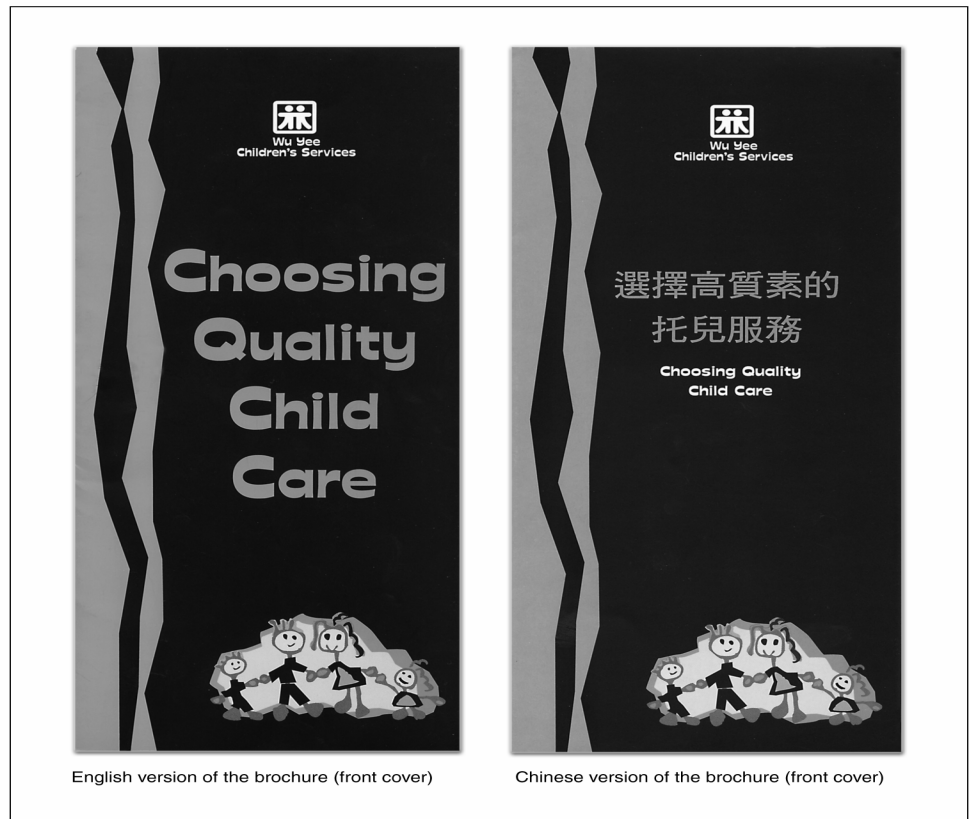
²⁵Through a contract with organizations providing telephone interpretation services, agency staff typically can dial a telephone number provided by the organization and request to be connected to a professional interpreter speaking a particular language. The interpreter, proficient in both English and another language, listens to the conversation between the staff and the client with limited English proficiency, analyzes the meaning of the message, and conveys the meaning to each side.

eight languages,²⁶ while California and Illinois made applications available in Spanish and gave local agencies the option of translating materials into other languages. Arkansas and North Carolina had no translated applications at the time of our visits, although officials in North Carolina said that the state was in the process of translating the subsidy application into Spanish.²⁷ All of the resource and referral agencies that we visited translated materials into Spanish, such as brochures containing information on how to receive child care assistance and what to look for when choosing a provider. A few resource and referral agencies also made efforts to translate written information into other languages. For example, as shown in figure 4, one agency translated a brochure on child care quality into Chinese. However, some state and local officials told us that their offices lacked the resources to translate materials into other languages.

²⁶Applications in Washington were available in Spanish, Chinese, Korean, Russian, Cambodian, Vietnamese, Somali, and Laotian.

²⁷In June 2006, a North Carolina official told us that the translation of the CCDF subsidy application into Spanish has been completed. Local agencies currently have access to the translated document, and the North Carolina Department of Health and Human Services is in the process of making both the English and the Spanish versions of the document available electronically for their use.

Figure 4: English and Chinese Versions of a Local Agency's Child Care Quality Brochure



Source: Wu Yee Children's Services.

The majority of local agency officials and providers that we interviewed told us that they relied on agency staff and volunteers to translate materials. For example, officials from a Head Start program told us that their staff had translated materials about the program into Spanish, Hmong, and Laotian. Officials at another Head Start program told us that they relied on bilingual staff, parents of children enrolled in the program, and Spanish-speaking volunteers from the community health clinic to translate the materials. Some agency officials told us that they also used outside contractors or other resources, such as commercially available translation software, to translate materials. Community group representatives expressed concerns about the quality of translations done by the local agencies, particularly in instances when volunteers or translation software had been used.

Most local agencies and providers that we interviewed said that they disseminated translated information to raise awareness of their programs and services among parents with limited English proficiency. Agencies and providers employed various mechanisms to disseminate information, including using print and radio media and direct distribution of informational materials in the communities where many families with limited English proficiency reside. For example, some resource and referral agencies and providers said that they advertised their programs and services on Spanish-language television and radio stations, and a few agencies had placed advertisements in the Yellow Pages. Most of them also reported distributing information in various locations in the community, such as churches, neighborhood markets, and laundromats.

Despite these agencies' various outreach efforts, mothers in focus groups, many of whom were unaware of the available assistance, said that there was a need for greater information dissemination in their communities. Spanish- and Vietnamese-speaking mothers in all 12 focus groups indicated that disseminating information in their language would help them learn about child care assistance and child care and early education programs for their children. At the same time, focus groups with Spanish-speaking mothers in California who were already receiving the subsidies revealed their ambivalence about increased advertising of certain child care programs because some of these programs already had waiting lists. Some state and local officials also acknowledged that they did little or no advertising because their programs were already operating at full capacity or had substantial waiting lists.

Selected Agencies Took Steps to Increase the Supply of Providers Able to Communicate Effectively with Parents

Agencies in the majority of locations that we visited had initiatives to increase the supply of providers who spoke other languages or to offer training in other languages to existing providers. Some agencies had come up with initiatives that focused on helping individuals speaking other languages to enter the child care field. For example, one resource and referral agency that we visited offered the classes required for obtaining a child care license in Spanish, and another one offered them in Cantonese. A resource and referral agency that we visited in an urban county developed a program to help Somali- and Russian-speaking women in the community obtain the training necessary to become licensed family child care home providers. In four of the five states that we visited, officials told us that selected community colleges participated in efforts to increase provider capacity to serve children of parents with limited English proficiency. For example, a community college in Illinois offered early childhood education classes in Spanish, while a community college in

California coordinated with a local resource and referral agency to offer these classes in Cantonese. However, some officials said that such efforts were insufficient, and in one state visited, an official from a university early childhood education program said that she was not aware of any efforts in the state to offer classes in other languages.

Many agencies that we visited also provided training to existing child care providers who had limited English proficiency. For example, local referral agencies in Illinois included bilingual individuals in the technical assistance teams available to assist providers in improving the quality of care.

Three of the five states that we visited used CCDF quality funds for various provider initiatives related to language, such as offering training to providers on working with families that had limited English proficiency or translating materials into other languages.²⁸ For example, Arkansas used quality funds for training and technical assistance to help providers understand cultural issues that families with limited English proficiency face. California used these funds to offer training to providers throughout the state on working with children who speak other languages. Officials in North Carolina said that while they did not have any projects funded with CCDF quality funds that directly related to serving children of parents with limited English proficiency, they had used some of the funds to translate materials on child care health and safety practices into Spanish. Two of the states visited—Washington and Illinois—did not use CCDF funds directly on initiatives related to serving children of parents with limited English proficiency or providers working with them. However, both states used the funds to support other initiatives, such as the work of resource and referral agencies, which included outreach to parents with limited English proficiency in some of their efforts.

State and local officials told us that despite efforts made, there was a shortage in some locations of training opportunities for providers who speak other languages. For example, officials across states and counties that we visited cited examples of child care providers with limited English proficiency who had attended training, such as training required for licensing, although they could not fully understand the course content

²⁸States are required to describe in their CCDF plans how CCDF quality funds will be used, but are not required to use them for initiatives focused on providers serving children of parents with limited English proficiency.

because it was not available in their languages. An official we interviewed told us that this could affect the quality of child care they would offer to children because the training covered critical issues, such as health and safety procedures.

Officials in Selected State and Local Agencies Reported Challenges in Providing Services to Parents with Limited English Proficiency

State and local agency officials, providers, and community college representatives reported several challenges associated with providing oral language assistance to parents with limited English proficiency applying for child care and early education programs for their children. Officials told us they faced challenges providing oral language assistance because of the difficulties that agencies had hiring qualified bilingual staff. Even when qualified bilingual individuals were found, officials said that these individuals were in very high demand and agencies could not always compete with other organizations interested in hiring them. For example, some child care and Head Start providers told us that they are losing qualified bilingual staff to school districts that offer higher salaries. Rural areas especially experienced difficulties hiring bilingual staff because their pool of qualified candidates was smaller than in the cities or virtually nonexistent. A few officials said that the lack of reliable transportation in rural areas makes it difficult to recruit staff from the cities. For example, a resource and referral agency official in one rural area that we visited told us that her office's bilingual staff had quit because they had difficulty getting to work. Officials also cited difficulties with finding professional interpreters and with the expense associated with hiring them when agencies lacked bilingual staff of their own to offer oral language assistance to clients.

Agency officials also reported challenges providing written language assistance to parents with limited English proficiency. They said that translating materials into other languages was expensive, particularly for agencies that served clients from several different language groups and had to translate materials into multiple languages. Local agencies frequently relied on their own staff to translate the materials, but a few officials said that this posed a burden on staff with other full-time responsibilities. At the same time, state and local officials said that contracting out for translations was expensive. Although state officials acknowledged the expense associated with translating materials into other languages, some states left local agencies to shoulder the burden of translating documents on their own. For example, state officials in California told us that the expense prevented the state from translating applications into languages other than Spanish, but local agencies had

absorbed the cost of translating applications themselves in order to meet the needs of program applicants who spoke other languages.

In addition, officials said that providing language assistance or training in other languages was not always cost-effective because of the relatively small number of individuals that would benefit from such efforts. For example, one resource and referral agency official told us that the cost of ordering materials in Spanish was higher than the cost of ordering the same materials in English because the materials had to be purchased in smaller orders, thereby increasing their cost. Some officials said that while they were able to offer language assistance to larger language groups in the area, such as Spanish speakers, they chose not to expand their assistance to include other language groups because of the small number of individuals that would benefit from it.

Despite challenges faced, agency officials that we interviewed expressed the need for effective and affordable ways to provide services to individuals with limited English proficiency. Officials in three states visited told us that they would benefit from having additional information on cost-effective strategies to serve parents with limited English proficiency. Several officials also told us that it would be helpful for them to learn more about the professional development opportunities for providers offered at other locations. For example, officials in Illinois said that the state's current capacity for provider training in Chinese was limited and that they would like to learn more about any curricula developed in other states with larger Asian populations.

HHS Provided Assistance to Grantees on Serving Children of Parents with Limited English Proficiency, but Gaps Remain in Its Program Review Efforts

HHS issued general guidance, translated materials, and provided technical assistance to grantees on serving children of parents with limited English proficiency, but gaps remain in its program review efforts. The Office of Head Start has provided assistance to increase awareness of the Head Start program among families with limited English proficiency and has monitored local programs' efforts to provide access to these families by reviewing grantees' biennial assessments of need in the communities they serve and by conducting formal monitoring reviews of grantees. However, an Office of Head Start official told us that the office could not ensure that its review teams consistently reviewed grantee compliance with program standards related to language access, and in our prior work we found that no mechanism existed to ensure consistency in the monitoring process. CCB provided assistance to help programs serve children whose parents have limited English proficiency, as well as reviewed states' CCDF plans and investigated complaints. However, CCB had no mechanism for reviewing how access to CCDF subsidies was provided for children of

parents with limited English proficiency or for ensuring that these children were not inadvertently excluded from the subsidies as a result of state eligibility criteria that were inconsistent with CCB's program eligibility guidance.

HHS Issued General Guidance to Grantees on Providing Access to Federal Programs for Individuals with Limited English Proficiency

In 2003, consistent with Executive Order 13166, HHS issued guidance to federal financial assistance recipients regarding the Title VI prohibition against national origin discrimination as it affects individuals with limited English proficiency. The guidance was intended to help recipients of HHS funds, such as agencies administering CCDF subsidies and Head Start programs, provide meaningful access for individuals with limited English proficiency. The guidance, however, applied to all HHS programs and did not refer specifically to child care or early education.

HHS' OCR provided outreach to potential beneficiaries of HHS programs and offered technical assistance to grantees to help them comply with the guidance. For example, OCR officials told us that they disseminated information about serving individuals with limited English proficiency at Hispanic health fairs, through recorded public service announcements and interviews on Spanish-language media, and by giving presentations before community service organizations. They also said that they provided grantees with technical assistance in identifying appropriate language access strategies. Regional OCR officials told us that their offices served as a resource for local social service agencies, directing them to less costly language access strategies, such as sharing interpreter services, and providing information on available resources and practices.

OCR also participated in the Federal Interagency Working Group on Limited English Proficiency that developed, among other things, a Web site devoted to serving persons with limited English proficiency (www.lep.gov). The Web site serves as a clearinghouse, providing information, tools, and technical assistance regarding limited English proficiency and language services for federal agencies, recipients of federal funds, users of federally assisted programs, and other interested parties. It makes available a range of guidance and information on offering language assistance through mechanisms such as interpreter services and translated materials for clients with limited English proficiency in the areas of health care, the courts, and transportation. However, it does not include specific information on providing language assistance in child care and early education programs. In addition, CCB and Office of Head Start officials and officials from several HHS regional offices told us that they were unaware of the Web site.

OCR is required to investigate all complaints of alleged discrimination, including lack of access to programs for individuals with limited English proficiency. OCR officials told us that Title VI violations in child care were rare. They said that when infractions do occur, they try to reach a voluntary compliance agreement with the state and conduct follow-up to ensure that the state takes corrective action to comply with the terms of the agreement. For example, North Carolina entered into a voluntary compliance agreement with OCR and implemented a corrective action plan for providing access for program applicants with limited English proficiency. A state official told us that the state was in the process of translating the subsidy application into Spanish as a result of this agreement.

The Office of Head Start Provided Assistance to Increase Awareness of Head Start and to Improve Service Delivery and Conducted Limited Monitoring of Language Access in Head Start Programs

The Office of Head Start has provided a variety of assistance to increase awareness of the Head Start program among families with limited English proficiency. The office has twice hosted a National Head Start Hispanic Institute, the goals of which included improving outreach to Hispanic communities, developing methods to effectively serve Hispanic children and families, and helping ensure positive outcomes in language and literacy development for English-language learners. A Head Start official told us that the needs of other language groups needed to be addressed as well, and that the Office of Head Start was considering how to replicate the institute for groups that speak other languages. According to officials, the Office of Head Start has several other initiatives to reach parents with limited English proficiency, such as placing public service announcements on Spanish-language media and distributing a brochure in Spanish informing families potentially eligible for Head Start of the benefits of enrolling their children in Head Start.

The Office of Head Start has also provided assistance to grantees to better serve children of parents with limited English proficiency. Recently, the office conducted a national language needs assessment of second language and dual language acquisition to identify culturally responsive, research-based strategies to improve outcomes for children and families. It also developed a Culturally Responsive and Aware Dual Language Education (CRADLE) training initiative that is designed to support grantees in their efforts to find best practices for language acquisition for the birth-to-3-year-old population. In addition, through its English Language Learners Focus Group, the Office of Head Start created materials for grantees working with second language learners, including Spanish speakers who constitute the majority of children in Head Start whose parents have limited English proficiency.

The Office of Head Start monitors grantees' efforts to provide access for individuals with limited English proficiency by reviewing their biennial community assessments and conducting formal on-site monitoring reviews. Head Start programs are required to conduct a community assessment at least once every 3 years, and the Office of Head Start regional officials review these assessments for demographic disparities between program participants and the population of the community to be served. For example, programs with assessments showing large numbers or proportions of language groups in the community that are not reflected in the enrollees or the classroom teachers may be found out of compliance with meeting local needs. Head Start programs are also monitored by the Office of Head Start once every 3 years through the PRISM process. Head Start programs are required to adhere to program performance standards that define the services that programs are to provide to children and their families, and on-site PRISM review teams monitor Head Start grantees' adherence to the standards. Several of the standards directly address interactions with children and parents with limited English proficiency. For example, one performance standard requires communications with parents to be carried out in the parent's primary or preferred language or through an interpreter.²⁹ Another performance standard directs programs in which the majority of children speak the same language to have at least one classroom staff member or home visitor who speaks that language.³⁰ The contractor responsible for assigning bilingual reviewers to PRISM review teams told us that about 17 percent of reviewers were bilingual and that review teams requesting a Spanish-speaking bilingual individual had one assigned 70 percent of the time.

A Head Start official with responsibility for the PRISM process told us that given the vast number of regulations, however, it was impossible to ensure that all of them were consistently reviewed in the course of a 1-week review. In our previous work, we reported that ACF had no process in place to ensure that its reviewers consistently followed the standards while conducting on-site PRISM reviews.³¹ We recommended that ACF develop an approach that can be applied uniformly across all of its

²⁹ 45 CFR §1304.51(c)(2)

³⁰ 45 CFR §1304.52(g)(2). In fiscal year 2004, the Office of Head Start found three programs in noncompliance with this performance standard.

³¹ GAO. *Head Start: Comprehensive Approach to Identifying and Addressing Risks Could Help Prevent Grantee Financial Management Weaknesses*, GAO-05-176 (Washington, D.C.: Feb. 28, 2005).

regional offices to assess the results of the PRISM reviews and implement a quality assurance process to ensure that the framework for conducting on-site reviews was implemented as designed. HHS agreed with our recommendation, and Head Start officials indicated that the Office of Head Start was developing new PRISM protocols and training reviewers to add more uniformity to how grantees are assessed. In addition, the Office of Head Start recently announced plans to conduct follow-up reviews of grantees monitored through the PRISM system in an effort to ensure that PRISM review teams did not miss grantee deficiencies, such as in providing assistance to children and parents with limited English proficiency.

CCB Provided Assistance to Help CCDF Programs Serve Children Whose Parents Have Limited English Proficiency but Had No Mechanism for Reviewing Agencies' Provision of Access

CCB provided assistance to raise program awareness among parents with limited English proficiency whose children may be eligible for CCDF subsidies. Officials told us that CCB had translated a number of its consumer education materials into Spanish, including the CCDF program brochure and public service announcements informing parents where and how to locate child care. In a targeted effort to reach Hispanic families and providers, CCB also translated into Spanish a brochure outlining what providers should know about child care assistance for families. CCB, through a cooperative agreement with the National Association of Child Care Resource and Referral Agencies (NACCRRA), provides educational information to parents through the Child Care Aware Web site (www.childcareaware.org). In addition, NACCRRA has translated consumer education publications into Spanish, including a publication on paying for child care, which it made available through its Web site to resource and referral agencies nationwide. CCB officials told us that they were also looking into translating these publications into Chinese. CCB also sponsors a National Child Care Information Center Web site (www.nccic.org), which offers information on a wide range of child care issues, including a number of documents that relate to serving children from families with limited English proficiency.

CCB officials told us that they provided opportunities for agencies and providers to share information, including information on serving children of parents with limited English proficiency. For example, CCB convened meetings of state CCDF administrators that, while not focusing specifically on issues of limited English proficiency, covered topics such as meeting the needs of diverse groups of children and parents. In addition, CCB maintains an online forum for states to pose questions and share ideas, which has been used to discuss such issues as converting print materials into Spanish. CCB also offers child care providers online access to training

modules, practical strategies for serving children and families, and interactive online chats in English and Spanish through the Center on Social and Emotional Foundations for Early Learning Web site (www.csefel.uiuc.edu).

While it has made efforts to assist states with serving the needs of children whose parents have limited English proficiency, CCB has no mechanism for reviewing how agencies provide access to CCDF subsidies for eligible children of parents with limited English proficiency or ensuring that these children are not inadvertently excluded as a result of state CCDF eligibility criteria that are inconsistent with agency guidance. CCB officials told us that CCDF is a block grant and CCB receives no funding specifically for supporting monitoring activities. As a result, CCB's oversight of CCDF is limited to reviewing states' CCDF plans and investigating complaints. CCB, however, does not require states to include assurances in their CCDF plans that state agencies are providing access to CCDF subsidies for children of parents with limited English proficiency. Regional officials told us that they had complaint processes in place and would either review complaints or refer them to OCR, but said that they were unaware of any complaints regarding restricted access for individuals with limited English proficiency. Officials in one region told us that states appeared to understand the CCDF program eligibility criteria. Officials in another region told us that while they interacted with states through phone calls and occasional on-site visits, these contacts primarily focused on the provision of technical assistance. Thus, these interactions were not a systematic review of how states determine eligibility for federal child care assistance.

On our site visit to Arkansas, we found that the state had eligibility requirements that appeared to violate CCB guidance. Specifically, although guidance to state agencies administering CCDF clarified that only the citizenship and immigration status of a child was relevant when determining the child's eligibility for federal child care assistance, applicants for child care assistance in Arkansas had to submit a declaration that the applicant (typically a parent applying to receive assistance for the child) and all the other members of the household were U.S. citizens, nationals, or legal residents. In addition, the state's policy manual for the administration of CCDF services indicated that the state would deny any applications for child care assistance that were submitted by parents or custodians who were neither citizens nor lawfully admitted residents. These requirements have the potential of precluding children who otherwise met the eligibility criteria from receiving federal financial assistance on the basis of their parents' citizenship or immigration status.

CCB officials told us that they were unaware of the situation until we brought it to their attention and that they were in the process of discussing with state officials how to resolve it. They further noted that they would investigate formal complaints brought to their attention, which would include complaints about states requesting unnecessary information on their child care subsidy applications and adversely affecting individuals with limited English proficiency. However, officials indicated that they had received no such complaints from affected parties.

Conclusions

Access to high-quality child care and early education programs helps promote healthy development of children and can provide an important support for parents as they pursue employment or education to secure the family's economic well-being and avoid public assistance. The resources available for nonentitlement child care and early education programs, such as CCDF subsidies and Head Start, are limited and not intended to cover everyone who meets eligibility criteria and is in need of assistance. Consequently, agencies have to make choices about who they will cover with the limited funds, employing strategies such as prioritization of certain groups of applicants or waiting lists. At the same time, federal, state, and local entities play important roles in ensuring that parents' language ability does not preclude children from being considered for coverage under these programs.

These roles are becoming especially important as the demographics of many communities are changing rapidly and localities across the country are seeing increased numbers of individuals with limited English proficiency. While state and local agencies are making efforts to address the needs of this growing population, they experience difficulties offering language assistance to parents seeking to access programs for their children and recruiting new providers with the language ability to serve these families. However, without reliable data on who is enrolled in their programs, state and local officials may have difficulty determining the extent to which parents with limited English proficiency have access to these programs for their children and whether services need to be adjusted to accommodate changes in the population served.

Although Congress provided states with flexibility in administering their CCDF program grants, HHS is responsible for ensuring that states adhere to the conditions of their grants and that they take reasonable steps to ensure access to individuals with limited English proficiency. Yet, HHS's existing methods for reviewing how CCDF funds are used by grantees do not systematically assess how access for parents with limited English

proficiency is provided or identify state or local policies that may adversely affect these parents' ability to access programs for their children. HHS responds to complaints of any alleged discrimination or agency actions that adversely affect the ability of eligible children to access programs and services. However, HHS may lack the tools to ensure equal access for children whose parents have limited English proficiency if the parents do not bring complaints for reasons such as language difficulties, unfamiliarity with how the complaint process works, or fear about approaching government agencies. Without a mechanism to systematically review access to CCDF-funded programs for these families, HHS cannot provide all eligible children with the same opportunity to participate in programs that would benefit them and their families and possibly enhance their households' self-sufficiency.

Recommendations for Executive Action

To help state and local agencies plan for language assistance and assess whether they provide meaningful access to eligible children, regardless of their parents' English ability, we recommend that CCB work with states to help them explore cost-effective strategies for collecting data on CCDF subsidy recipients' language preference or English proficiency and comparing these data with available information on community demographics. Once these data are available, HHS may consider collecting information on existing cost-effective ways for agencies to provide language assistance and to recruit providers who speak other languages, as well as disseminating this information in the locations where the data show the greatest need.

To provide opportunities to parents with limited English proficiency to access federal child care subsidies for their children, we recommend that HHS develop and implement specific steps to review whether and how states provide access to CCDF programs for eligible children of parents with limited English proficiency, as well as provide information to help states evaluate their progress in this area. Specifically, HHS should

- revise the CCDF plan template to require states to report on how they will provide meaningful access to parents with limited English proficiency seeking CCDF subsidies for their children, and
- systematically review states' program eligibility criteria for CCDF subsidies to ensure that states comply with HHS policies related to participation by children of parents with limited English proficiency.

Agency Comments and Our Evaluation

ACF provided written comments on a draft of this report, which are reproduced in appendix III. In its letter, ACF agreed with most aspects of our recommendations and provided information on its actions or plans that would support their implementation. In addition, ACF provided a number of technical comments that we incorporated as appropriate.

In response to our recommendation that HHS work with states to help them explore cost-effective ways of collecting data on the primary language of CCDF subsidy recipients, ACF provided some additional information on actions it has taken to help states in this area. For example, it stated that in July 2006, CCB launched a technical assistance initiative that will, among other things, disseminate information to states on effective strategies to assist families with subsidy access, including families experiencing language barriers.

Regarding our second recommendation, that HHS develop a mechanism to review how states provide access to CCDF subsidies for children of parents with limited English proficiency, ACF indicated that it will examine the feasibility of using the CCDF plan template to ask states to report on their efforts to promote access to these families. However, ACF did not address our recommendation that HHS systematically review states' eligibility criteria for CCDF subsidies to ensure that states comply with HHS policies related to participation by children whose parents have limited English proficiency.

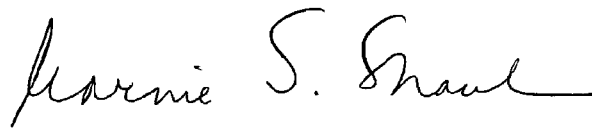
ACF also submitted detailed comments related to our analysis of national survey data collected in 1998 as part of ECLS-K. ACF noted that ECLS-K data only provide information on children in the year before kindergarten and that the analysis omits other variables that may explain our findings, such as preferences for certain types of care within ethnic communities and parents' immigration status. Our report discusses these data limitations, and as is the case with any statistical model, some of the factors with the potential to affect the outcomes we examined could not be included because the data measuring them were not collected. It is partly for that reason that we employed multiple methodologies in addressing our research objectives, including site visits and focus groups.

ACF noted that the data represent child care and early education patterns for 1997 and that subsequent policy changes or increases in federal and state child care funding, may have narrowed the gap in program participation among different groups of children. However, we found that some of the policy changes ACF cited were not consistently implemented and ACF provided no more current data that would allow us to ascertain

the effects of these changes. As such, ECLS-K remained the most recent national dataset that allowed us to compare children of parents with limited English proficiency and similar children whose parents are proficient in English with respect to their receipt of financial assistance for child care from a social service or welfare agency and their participation in Head Start.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days after the date of this letter. At that time, we will send copies of this report to the Secretary of HHS, relevant congressional committees, and other interested parties. We will also make copies available to others upon request. In addition, the report will be made available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215. Other contacts and major contributors are listed in appendix IV.



Marnie S. Shaul, Director
Education, Workforce, and
Income Security Issues

Appendix I: Scope and Methodology

In conducting our work, we employed multiple methodologies, including a review of available data on participation of children in child care and early education programs, state and county site visits, focus groups with mothers who have limited English proficiency, interviews with federal officials and national experts, and a review of available legislation, guidance, and other federal resources. We performed our work in accordance with generally accepted government auditing standards between July 2005 and June 2006.

Analysis of National Program Participation Data and State Data Inquiries

To obtain information on the participation of children whose parents have limited English proficiency in child care and early education programs funded through the Child Care and Development Fund (CCDF) and Head Start, we obtained and reviewed the most recent program participation data from the U.S. Department of Health and Human Services (HHS), surveyed states about their data on CCDF subsidy recipients, and analyzed national survey data available through the Early Childhood Longitudinal Study, Kindergarten Class of 1998-99 (ECLS-K). The relevant characteristics of data sources we examined are shown in table 1.

Table 1: Characteristics of Data Sources Examined

Source of data	Programs covered	Scope of data collection	Availability of data on the language of program participants	Ability to use the data to estimate participation rates by children of parents with limited English proficiency	Reasons why data cannot be used to estimate participation rates by children of parents with limited English proficiency
CCB databases	CCDF	Enrollment or sample of program participants (depending on state)	None	No	CCB does not collect data related to language in its monthly or annual reports from states.
State databases	CCDF	Enrollment or sample of program participants (depending on state)	Varies by state	No	Approximately one-quarter of states collect data; their data have many limitations, and states collect data differently.
NRS	Head Start	Enrollment, for all 4- and 5-year-old children in Head Start	Child speaks language other than English at home, child's primary language, and child's English proficiency as determined by local staff	No	NRS data are collected only from children enrolled in Head Start, so the participation rate in the overall population is unknown. Data are not available on the parents' English proficiency.
FACES	Head Start	Sample of parents with 3 and 4-year-old children in Head Start	Parent self-assessment of language ability and language spoken at home	No	FACES data are collected only on children enrolled in Head Start, so the overall participation rate is unknown.
ECLS-K	Child Care assistance and Head Start	Sample of children in kindergarten	Parent self-assessment of language ability and language spoken at home	No (for CCDF programs) Yes (for Head Start participation in the year before kindergarten)	The survey questions did not ask for the source of child care financial assistance.

Source: GAO analysis of HHS program participation data, ECLS-K, and telephone interviews with state officials.

We reviewed CCDF program participation data collected by CCB in the reports that states are required to submit on CCDF subsidy recipients but found that these reports did not contain any data related to language from CCDF subsidy recipients or their families. CCB officials confirmed that they do not currently collect any language data, since such data collection was not listed in the CCDF authorizing legislation.³²

³²CCB collects data from states on the race and ethnicity of subsidy recipients, but these do not allow for identification of CCDF recipients speaking other languages.

We reviewed language data for Head Start participants available from the Office of Head Start through the Head Start National Reporting System (HSNRS) and the Head Start Family and Child Experiences Survey (FACES). HSNRS, implemented in August 2003, is the nationwide skills test of over 400,000 children aged 4 and 5 in Head Start, intended to provide information on how well Head Start grantees are helping children progress. The Computer-Based Reporting System (CBRS) was developed for HSNRS to allow local Head Start staff to enter descriptive information about their programs, including the demographic characteristics of children assessed by HSNRS. We requested and reviewed HSNRS demographic data from spring 2005 that provided information on the primary language of children in Head Start. FACES is a series of longitudinal surveys of nationally representative samples of children in Head Start. We requested and reviewed fall 2003 FACES data, which included about 2,400 parent interviews that provided information on the languages spoken at home by Head Start families, parents' self-reported English proficiency, and the availability of Head Start staff to communicate with children and parents in their preferred language.

To assess the reliability of Head Start data, we interviewed relevant HHS officials and officials from Westat, a private research corporation administering and analyzing HSNRS and FACES under a contract with the Office of Head Start. In addition, we reviewed relevant documentation and examined the logs of the computer code used to generate the data provided to us. Because HSNRS data were collected only for 4- and 5-year-old children in Head Start, they cannot be used to generalize about all children in Head Start.³³ The HSNRS data were entered into CBRS by the staff of local Head Start programs. While we did not independently verify these data, we did not find any evidence to suggest that they were unreliable. As part of FACES, interviews were held directly with parents of children in Head Start. While Spanish interviewers were available, parents with limited English skills who spoke other languages were required to provide their own interpreter. Parents unable to participate in an interview in English or Spanish or provide their own interpreters could not be included in the survey. According to a Westat official, however, only three interviews could not be conducted because of the lack of an interpreter. We determined that FACES data were sufficiently reliable for the purposes of this report.

³³The Head Start program also serves children who are 3 years old.

Because the available agency data did not allow us to determine the total participation of children of parents with limited English proficiency in federal child care and early education programs, we also analyzed survey data provided by NCES from ECLS-K, a national longitudinal study focusing on following children's early education and school experiences from kindergarten through 12th grade. We used data from the fall 1998 base year survey of approximately 18,000 parents with children in kindergarten. ECLS-K was the most recent national dataset that allowed us to compare child care, financial assistance for child care, and Head Start usage rates among children with parents who had limited English proficiency and children whose parents were proficient in English.³⁴ Among other topics, ECLS-K asked parents about their English proficiency, the languages spoken at home, their child's use of child care in the year before kindergarten, any financial assistance from a social service or welfare agency, and the child's use of Head Start.³⁵ The survey did not ask for the specific social service or welfare agency providing financial assistance for child care, so we were unable to make estimates about the use of CCDF subsidies from this dataset. NCES had bilingual interviewers available to conduct the survey in Spanish, Chinese, Hmong, and Lakota if the respondent was not able to speak English and no English-speaking member of the household was available. Slightly more than 7 percent of the interviews were conducted in a language other than English. More information about our analysis of ECLS-K data can be found in appendix II.

To assess the reliability of ECLS-K data, we reviewed relevant information about the survey, including the user manual, data dictionary, and steps taken to ensure the quality of these data, and performed electronic testing to detect obvious errors in completeness and reasonableness. We determined that the ECLS-K data were sufficiently reliable for the purposes of this report.

³⁴NCES started following a new cohort of children, starting at birth, in 2001. However, the data on their experiences in the year before kindergarten are not expected to be available until 2008.

³⁵NCES attempted to verify enrollment for children whose parents reported that they were in Head Start. While only about half of the enrollments could be confirmed, NCES concluded that "families with unconfirmed reports of Head Start participation by their children had demographic characteristics similar to those of families with confirmed participation in Head Start. This lends support to the notion that a substantial proportion of these children had indeed attended Head Start programs, even though their attendance could not be verified." (Source: "User's Manual for the ECLS-K Base Year Restricted-use Head Start Data Files and Electronic Codebook," NCES 2001-025.)

We also contacted child care administrators in all 50 states and the District of Columbia to determine whether any states collected their own data on the language of CCDF subsidy recipients. We discussed data collection with officials in 5 states in the course of our site visits and contacted officials in the remaining 45 states and the District of Columbia by e-mail. Of those contacted by e-mail, 40 states and the District of Columbia responded. Overall, 12 states and the District of Columbia collected some language data from parents whose children received CCDF subsidies. We then followed up with officials in the District of Columbia and all 12 states that reported collecting the data on the language of CCDF subsidy recipients to ask questions about the type of data collected, the methods by which the data were collected, the challenges states faced in collecting the data, and the purposes for which the data were used. We did not ask states to submit their data to us because we determined that the differences in states' data collection approaches and the limitations of state data would preclude us from aggregating state data to produce national estimates of CCDF subsidy use among children of parents who speak other languages.

Site Visits

To obtain information on the challenges that parents with limited English proficiency face in accessing CCDF subsidies and Head Start and the assistance provided to these families by state and local entities, we visited 5 states—Arkansas, California, Illinois, North Carolina, and Washington. We selected these states on the basis of the size and growth of their population of individuals with limited English proficiency as determined by our analysis of 1990 and 2000 data from the U.S. Census Bureau, the states' geographic location, and the presence of initiatives focused on individuals with limited English proficiency as determined by our review of CCDF plans that states are required to submit to CCB every 2 years. We visited 10 counties across these states, as well as contacted officials in 1 county by telephone. We selected counties with substantial numbers of individuals with limited English proficiency or that have experienced a significant growth in this population based on the analysis of 1990 and 2000 U.S. Census data. (See table 2.) In choosing counties, we also considered the proportion of residents living in urban and rural parts of the county to obtain information on the experiences of families in both urban and rural areas.

Table 2: Selected Characteristics of Site Visit Counties

County	Individuals with limited English proficiency (LEP)				Percentage change in number of individuals with LEP (1990-2000)	Percentage change in proportion of individuals with LEP as a percentage of population (1990-2000)
	Number of individuals with LEP (1990)	Individuals with LEP as a percentage of total population (1990)	Number of individuals with LEP (2000)	Individuals with LEP as a percentage of total population (2000)		
Washington County, Arkansas	483	0.5	4,925	3.4	919.7	637.3
Fresno County, California	66,070	10.9	86,776	11.8	31.3	8.6
Los Angeles County, California	1,153,956	14.2	1,395,347	15.9	20.9	11.9
San Francisco County, California	86,228	12.5	99,659	13.4	15.6	6.7
Cook County, Illinois	247,814	5.2	392,663	7.9	58.5	50.1
Winnebago County, Illinois	2,510	1.1	6,208	2.4	147.3	123.3
Durham County, North Carolina	1,330	0.8	8,886	4.3	568.1	442.6
Sampson County, North Carolina	377	0.9	2,618	4.7	594.4	451.2
King County, Washington	27,329	1.9	63,004	3.9	130.5	98.2
Yakima County, Washington	10,916	6.3	20,686	10.2	89.5	60.4
Chatham County, North Carolina ^a	297	0.8	2,243	4.8	655.2	488.2

Source: GAO analysis of data from the U.S. Census.

^aWe contacted officials in this county by telephone.

On each site visit, we interviewed various stakeholders in the child care and early education field at the state and local levels, including officials responsible for administering CCDF subsidies, representatives of child care resource and referral agencies, Head Start officials, and child care and early education providers, as well as officials from community

organizations and advocacy groups working with individuals who have limited English proficiency.

Focus Groups

To obtain information on the challenges that parents with limited English proficiency face when accessing child care subsidies for their children, we conducted 12 focus groups with mothers who had limited English proficiency in California, Washington, and North Carolina. We selected these locations in order to include both states with historically large populations of individuals with limited English proficiency (California and Washington) and a state experiencing a more recent growth in this population (North Carolina)—based on our analysis of data from the U.S. Census. GAO contracted with Aguirre International, a firm specializing in applied research with hard-to-reach populations, to recruit focus group participants through community-based organizations, arrange facilities for focus groups in locations familiar and accessible to the participants, provide transportation to and from child care during the focus groups, moderate the group discussions, and translate focus group transcripts. Focus groups were conducted from January 2006 to March 2006.

Consistent with focus group data collection practices, our design involved multiple groups with certain homogeneous characteristics. All focus groups were conducted with mothers of children aged 5 or younger enrolled in child care. These mothers also had limited English proficiency as self-reported by potential participants during the focus group recruitment process and were eligible for CCDF subsidies as determined by family's income and parental work and education activities. The focus groups varied by primary language spoken and whether or not participants' children were receiving government child care subsidies.³⁶ Eight of the 12 focus groups were conducted in Spanish and 4 in Vietnamese. We chose to conduct focus groups in Spanish and Vietnamese because these two languages were among the most prevalent languages, other than English, spoken in the states of interest. According to 2000

³⁶During the focus group recruitment process, mothers were asked a series of questions to ensure that it was likely that they were receiving CCDF subsidies or eligible for them (depending upon whether they were selected for the subsidized or unsubsidized groups), and to screen out participants in other similar local programs such as state preschool programs or local subsidy programs. However, states may use multiple sources to fund their child care assistance programs, and participants may not know whether the source of their assistance is federal or state funds. Therefore, it is possible that some of the government subsidies received by participants were not funded entirely or at all by CCDF even though the recipients met the criteria for eligibility.

Census data, Spanish was the language most commonly spoken among these households in the states we visited. In Washington, Vietnamese was the most commonly spoken language after Spanish, and in California, Vietnamese was the second most commonly spoken language after Spanish. We did not conduct focus groups in Vietnamese in North Carolina because of the limited number of individuals who spoke languages other than English or Spanish in the state. Six of the focus groups consisted of mothers with young children (ages 0-5) who were enrolled in child care and received a government subsidy for that care; the other 6 groups consisted of mothers with young children (ages 0-5) who were enrolled in child care and did not receive a government subsidy for that care, but whose children likely qualified for subsidies based upon their family’s income and employment or education activities. Table 3 describes the characteristics of the group at each location and lists locations and dates for each focus group conducted. The number of participants in each focus group ranged from 6 to 13.

Table 3: Composition of Focus Groups

	Language	Location	Date
Subsidized	Spanish	Yakima, Wash.	January 31, 2006
	Spanish	Siler City, N.C.	February 4, 2006
	Spanish	Siler City, N.C.	March 2, 2006
	Spanish	San Jose, Calif.	February 8, 2006
	Vietnamese	San Jose, Calif.	February 11, 2006
	Vietnamese	Seattle, Wash.	February 20, 2006
Unsubsidized	Spanish	Yakima, Wash.	February 20, 2006
	Spanish	Pittsboro, N.C.	February 4, 2006
	Spanish	Pittsboro, N.C.	February 18, 2006
	Spanish	Oakland, Calif.	February 7, 2006
	Vietnamese	San Jose, Calif.	February 9, 2006
	Vietnamese	Seattle, Wash.	February 20, 2006

Source: GAO analysis of focus group transcripts.

To help the moderator lead the discussions, GAO developed a guide that included open-ended questions related to mothers’ experiences finding appropriate child care and attempting to access financial assistance to help pay for the care. Discussions were held in a structured manner and followed the moderator guide.

Focus groups involve structured small group discussions designed to gain in-depth information about specific issues that cannot easily be obtained from single or serial interviews. Methodologically, they are not designed to provide results generalizable to a larger population or provide statistically representative samples or reliable quantitative estimates. They represent the responses only of the mothers who participated in our 12 groups. The population of individuals with limited English proficiency in the United States consists of many cultural backgrounds and languages in addition to Spanish and Vietnamese, and those and other factors may influence the experience and attitudes of parents with limited English proficiency regarding child care. Therefore, the experiences of other mothers may be different from those of focus group participants. In addition, while the composition of the groups was designed to include different states, languages, and subsidy participation status, the groups were not random samples of mothers with limited English proficiency.

Other Methodology

To assess HHS's efforts to ensure access to its programs for parents with limited English proficiency, we interviewed HHS officials, reviewed documents and guidance produced by HHS for state and local grantees, and analyzed relevant legislation. We interviewed officials from CCB, the Office of Head Start, HHS's Office for Civil Rights, and the five HHS regional offices that covered the states that we visited.³⁷ We also reviewed informational materials produced by HHS to facilitate access to programs for individuals with limited English proficiency and online resources pertaining to language access that were available through HHS's and the Department of Justice's Web sites. Additionally, we analyzed relevant legislation, federal regulations, and reports from research organizations.

Finally, to obtain information pertaining to our research objectives, we interviewed officials from various national organizations working on issues related to early child care and education, as well as organizations advocating on behalf of individuals with limited English proficiency.

³⁷The regional offices that we contacted were: Region IV (North Carolina); Region V (Illinois); Region VI (Arkansas); Region IX (California); and Region X (Washington).

Appendix II: Analyses of the Effects of Limited English Proficiency on Child Care and Early Education Patterns

We analyzed national survey data collected in 1998 as part of the Early Childhood Longitudinal Study, Kindergarten Class of 1998-99 (ECLS-K) from parents of kindergarten children about their children's experiences in the year before kindergarten. To conduct our analyses, we used logistic regression models to estimate the "net effects" of the parent's limited English proficiency on children's child care and early education patterns. We defined parents as having limited proficiency in English if the parent participating in the interview reported that a language other than English was spoken at home, and if the respondent him or herself reported speaking English either "not very well" or "not well at all." We made this decision because we surmised that speaking is one of the main channels through which information about child care is communicated. Additionally, we made the decision to focus on the English language ability of the parent participating in the interview on the assumption that the respondent participating in the survey about his or her child would have a primary role in child care decisions.

We considered the effect of the parent's limited English proficiency on four outcomes. First, we looked at the effect it had on the likelihood of their child receiving any type of nonparental child care in the year before the child was in kindergarten, regardless of whether the care was provided in a child care center (including a prekindergarten program) or by relatives or nonrelatives in some other setting. Second, we looked at the effect that limited English proficiency had on the likelihood of receiving financial assistance from a social service or a welfare agency to help pay for child care among those who did receive child care. Third, we looked at the effect that limited English proficiency had on the likelihood that the child care provided was in a center-based facility (rather than care provided by relatives or nonrelatives) because it has been suggested that children whose parents have limited English proficiency may be less likely to receive center-based care than other children. Fourth, and finally, we considered whether limited English proficiency affected the likelihood of participating in Head Start.

By "net effects," we mean the effects of limited English proficiency that operate after we control for other factors that affect these different outcomes and that are related to limited English proficiency. The most obvious among these other factors is race or ethnicity. That is, the probability of using any nonparental care, receiving financial assistance for child care, having center-based care rather than some other form of care, and participating in Head Start are different among racial and ethnic groups, and English proficiency is vastly different for some groups, particularly Hispanics and Asians, than for whites and other races. As

such, after looking at the difference between children of parents with limited English proficiency and other children on these outcomes, we used multivariate logistic regression models to re-estimate this difference when controlling for the effect of characteristics such as the child's race or ethnicity. The other characteristics we controlled included household income (because of its effect on eligibility for some child care assistance programs and Head Start) and parental education (because previous studies have shown it to have an effect on participation in child care and early education programs). We also controlled for the number of persons over 18 in the household and whether the parent or parents in the house were employed because these can affect the availability of care givers in the home and determine the need for child care and child care assistance outside of the home. Another reason why we controlled for parental employment status is that it is one of the factors considered for CCDF eligibility. When we looked at the likelihood of receiving any care or receiving that care in a center-based facility, as well as at the likelihood of receiving financial assistance for care received, we controlled for whether the family participated in Head Start, since we surmised this may affect whether additional child care was needed. Additionally, because we thought that being in multiple types of child care may affect the likelihood of one of them being provided in a center-based facility or being subsidized by an outside source, we also controlled for whether the child received multiple types of child care when we looked at the likelihood of a child being in center-based care or receiving financial assistance for child care. Finally, when we looked at whether financial assistance was received for the care, we controlled for whether the care was provided in a center-based facility on the assumption that the cost of care may be higher when it is provided in a formal center-based setting. Additionally, other factors, such as family preferences for a certain type of care and parents' immigration status, as well as changes in the CCDF program and child care policies within a particular state of residence may affect child care and early education patterns of children. We partially mitigated the potential effect of preferences for certain types of care on the receipt of financial assistance for child care by controlling for whether or not the child was in center-based care. However, we could not include all factors that may have had an effect on the outcomes in the analysis because the ECLS-K did not collect the data to measure them.

An understanding of how to interpret the results of these multivariate logistic regression models is facilitated by first considering tables 4 and 5, which estimate the effects of limited English proficiency, and race or ethnicity, on the first two of these four outcomes. Tables 4 and 5 estimate how English proficiency and race or ethnicity are related to receiving any

nonparental child care and to receiving financial assistance for child care (among those who received any nonparental child care). It is important to note that these estimates are unadjusted for other characteristics that are related to these outcomes, such as education, income, and employment status. The top section of tables 4 and 5 shows the effect of parents' limited English proficiency on the two outcomes, the middle section shows the effect of the child's race or ethnicity, and the bottom section shows the joint effect of the two, or the effect of limited English proficiency within each racial or ethnic category. We show these effects in each section of the tables by first providing percentages of children of parents with limited English proficiency and other children having a certain outcome. We then calculate odds and odds ratios for the likelihood of children within each of the two groups having these outcomes. Odds and odds ratios are the measures used to describe effects that underlie the logistic regression models we later employ to estimate net effects of limited English proficiency while controlling for other factors.

Consider table 4, which provides percentages, odds, and odds ratios related to the differences in receiving any type of child care across children that differ by their parents' English proficiency, their race or ethnicity, and both. We see in the top section that while approximately 75 percent of children whose parents are English proficient received some form of child care in the year preceding kindergarten, the same is true of only 46 percent of children whose parents have limited English proficiency. These percentages are derived from weighted data in our sample that take account of the fact that we are working with a sample that is not a simple random sample (where all individuals have an equal chance of being selected), but one in which children in some groups, namely Asians and Pacific Islanders, were oversampled. They are based, however, on the unweighted number of cases in our sample of 18,033 respondents (16,784 of them with parents proficient in English and 1,249 with parents with limited English proficiency), given in the third column of the table. The difference in these two percentages is sizable, and statistically significant, and would lead us to conclude that children of parents with limited English proficiency are less likely to receive nonparental care of any form.

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Table 4: Differences in the Percentages and Odds of Receiving Any Nonparental Care, by Parents' English Proficiency Status, Race or Ethnicity, and Both, among Preschool-Aged Children

Parents' English proficiency status		No (%)	Yes (%)	N (unweighted)	Odds on yes: no	Odds ratio
English proficient		25.2	74.8	16,784	2.97	
Limited English proficient		54.4	45.6	1,249	0.84	0.28*
Total		27.3	72.7	18,033		
Race or ethnicity						
White		21.8	78.2	10,262	3.59	
Black		29.5	70.5	2,638	2.39	0.67*
Hispanic		39.7	60.3	3,205	1.52	0.42*
Asian		29.6	70.4	979	2.38	0.66*
Other		33.9	66.1	989	1.95	0.54*
Total		27.3	72.7	18,073		
Race or ethnicity	Parents' English proficiency status					
White	English proficient	21.7	78.3	10,204	3.62	
	Limited English proficient	38.1	61.9	34	1.62	0.45*
Black	English proficient	29.2	70.8	2,611	2.43	
	Limited English proficient	60.8	39.2	10	0.65	0.27*
Hispanic	English proficient	32.4	67.6	2,217	2.09	
	Limited English proficient	55.6	44.4	974	0.80	0.38*
Asian	English proficient	25.4	74.6	753	2.94	
	Limited English proficient	46.0	54.0	222	1.17	0.40*
Other	English proficient	33.9	66.1	976	1.95	
	Limited English proficient	33.7	66.3	8	1.97	1.01
Total		27.2	72.8	18,009		

Source: GAO analysis of ECLS-K data.

* Denotes significance at the 95 percent level.

An alternative way to look at this difference is by calculating the odds of receiving child care, which is the percentage of children who receive child care divided by the percentage of children who do not. In the case of children of parents that are English proficient, these odds are $74.8/25.2 = 2.97$, which implies that in that group, approximately 3 families use child care for every family that does not (or that 300 families do for every 100 families that do not). In the case of children of parents that are not English proficient, these odds are $45.6/54.4 = 0.84$, which implies that for them, approximately 0.8 families use child care for every family that does not (or that 80 families do for every 100 that do not). The ratio of

these two odds, or $0.84/2.97 = 0.28$, tells us that the odds on receiving any care are decidedly lower for children of parents with limited English proficiency than for children of parents that are English proficient, by a factor of 0.28.

The middle section of table 4 shows the differences in the percentages and odds of children receiving child care across racial or ethnic categories. The percentages of children receiving child care in the year before kindergarten are lower for minority children than for whites, and these differences are reflected in the odds as well. Among white children, about 3.6 children received child care for every child that did not, while among blacks and Asians approximately 2.4 children received child care for every child that did not. Among Hispanics, approximately 1.5 children received child care for every child that did not. Where variables have more than two categories, such as different categories of race and ethnicity, we chose one category as the reference category and calculated odds ratios that reflect how different each of the other categories is relative to that one. In this case, whites were chosen as the reference category, and the odds ratios of 0.67, 0.42, 0.66 and 0.54 indicate how much lower the odds of receiving child care were for blacks, Hispanics, Asians, and other races, respectively, than for whites.

The bottom section of table 4 shows the differences in the percentages of children receiving any child care across the joint (or combined) categories of parents' English proficiency and the child's race or ethnicity. Here we have calculated odds for each of the joint categories, and the odds ratios, which indicate how different the odds are across English proficiency categories, within each category of race or ethnicity. We can see that within most categories of race or ethnicity, children of parents with limited English proficiency have lower odds of receiving any child care than children of parents that are proficient in English, by factors such as 0.38 for Hispanics and 0.40 for Asians. The odds ratios for whites, blacks, and others were based on very small numbers of children of parents with limited English proficiency. Of the 1,249 children of parents with limited English proficiency, only 34, 10, and 8 children are white, black, and other, respectively, and these numbers are too small for us to assess whether and how much they differ from children of parents that are proficient in English.

In sum, table 4 indicates that children of parents with limited English proficiency were less likely to receive any child care than children of parents proficient in English. Some of this is due to the fact that children of parents with limited English proficiency tend to be Hispanic and Asian,

groups that are less likely than whites to receive child care. However, not all of it is due to race or ethnicity differences, since among Hispanics and Asians the children of parents with limited English proficiency were less than half as likely as others within the same racial or ethnic group to receive any child care.

Table 5 provides similar information with respect to the likelihood of receiving financial assistance for child care, among those children that received any care. Overall, children of parents with limited English proficiency were less likely than those with parents proficient in English to receive financial assistance (odds ratio = 0.60), though most racial or ethnic minorities, except for Asians, were more likely than whites to receive financial assistance when they received some type of care. That is, while Hispanic children were twice as likely as white children to receive financial assistance, and blacks and other races were approximately four times as likely, Asians' odds of receiving financial assistance were not statistically distinguishable from those of whites (odds ratio = 0.70). Further, in the two groups—Hispanics and Asians—that had sizable numbers of children of parents with limited English proficiency, the effect of limited proficiency was different. Among Hispanics, the odds of receiving financial assistance were lower for children of parents with limited English proficiency than for children of parents that were proficient in English (odds ratio = 0.46), while among Asians the odds of receiving financial assistance were not statistically distinguishable between children of parents with limited English proficiency and children of parents that were proficient in English (odds ratio = 1.95). Among the other groups, the numbers of children of parents with limited English proficiency who received child care in the year prior to kindergarten were too small for us to be able to reliably detect any difference between them and others in the likelihood of receiving financial assistance.

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Table 5: Differences in the Percentages and Odds of Receiving Financial Assistance for Child Care, among Those in Any Prekindergarten Care, by Parents' English Proficiency Status, Race or Ethnicity, and Both

Parents' English proficiency status		No (%)	Yes (%)	N (unweighted)	Odds on yes:no	Odds ratio
English proficient		93.2	6.8	12,732	0.07	
Limited English proficient		95.8	4.2	584	0.04	0.60**
Total		93.4	6.6	13,316		
Race or ethnicity						
White		95.9	4.1	8,173	0.04	
Black		85.4	14.6	1,874	0.17	4.02*
Hispanic		92.5	7.5	1,976	0.08	1.90*
Asian		97.1	2.9	676	0.03	0.70
Other		85.1	14.9	637	0.17	4.11*
Total		93.4	6.6	13,336		
Race or ethnicity	Parents' English proficiency status					
White	English proficient	95.9	4.1	8,138	0.04	
	Limited English proficient	100.0	0.0	20	0.00	0.00
Black	English proficient	85.4	14.6	1,861	0.17	
	Limited English proficient	73.1	26.9	4	0.37	2.15
Hispanic	English proficient	91.5	8.5	1,533	0.09	
	Limited English proficient	95.9	4.1	435	0.04	0.46*
Asian	English proficient	97.5	2.5	554	0.03	
	Limited English proficient	95.2	4.8	120	0.05	1.95
Other	English proficient	85.2	14.8	629	0.17	
	Limited English proficient	100.0	0.0	5	0.00	0.00
Total		93.4	6.6	13,299		

Source: GAO analysis of ECLS-K data.

* denotes significance at the 95 percent level.

** denotes significance at the 90 percent level.

The tables above showed the gross or unadjusted differences in receiving child care and receiving financial assistance for child care between children of parents with limited English proficiency and children of parents proficient in English, and what those differences look like when we control for or take account of race or ethnicity, the factor with which parents' limited English proficiency is most closely associated. However, limited English proficiency is associated with a number of other factors that affect these two outcomes, as well as the other two outcomes that were of interest to us, which were the likelihood of receiving center-based

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care (as opposed to care from relatives or nonrelatives in some other setting) and the likelihood of participating in Head Start. Tables 6 through 9 show that the percentages of children that are Hispanic or Asian, from lower-income families, have less educated parents, and have three or more persons in the household over the age of 18 are higher among children of parents with limited English proficiency than among other children. Tables 10 and 11 show that the percentage of children that have their parent (in single parent households) or both parents working and the percentage of children that receive multiple types of care are lower among children of parents with limited English proficiency than among other children.

Table 6: Percentages of English Proficient Parents and Parents with Limited English Proficiency, by Race or Ethnicity

	Race or ethnicity					Total (%)	N (unweighted)
	White (%)	Black (%)	Hispanic (%)	Asian (%)	Other (%)		
English proficient	61.5	16.8	14.2	2.5	5.0	100.0	16,784
Limited English proficient	2.6	1.1	87.7	8.3	0.4	100.0	1,249

Source: GAO analysis of ECLS-K data.

Table 7: Percentages of English Proficient Parents and Parents with Limited English Proficiency, by Family Income

	Income (percentage of the poverty level)			Total (%)	N (unweighted)
	< 100 percent of poverty level (%)	100–200 percent of poverty level (%)	>200 percent of poverty level (%)		
English Proficient	20.9	23.2	55.9	100.0	16,784
Limited English Proficient	55.4	32.0	12.6	100.0	1,249

Source: GAO analysis of ECLS-K data.

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Table 8: Percentages of English Proficient Parents and Parents with Limited English Proficiency, by Education

	Highest education level of parent(s) in the household			Total (%)	N (unweighted)
	< High school graduate (%)	High school graduate (%)	> High school graduate (%)		
English proficient	7.8	27.2	65.0	100.0	16,784
Limited English proficient	47.4	29.9	22.7	100.0	1,249

Source: GAO analysis of ECLS-K data.

Table 9: Percentages of English Proficient Parents and Parents with Limited English Proficiency, by the Number of Persons over the Age of 18 in the Household

	Number of persons over 18			Total (%)	N (unweighted)
	1 (%)	2 (%)	3+ (%)		
English proficient	16.1	72.1	11.8	100.0	16,782
Limited English proficient	8.5	64.3	27.2	100.0	1,249

Source: GAO analysis of ECLS-K data.

Table 10: Percentages of English Proficient Parents and Parents with Limited English Proficiency, by Parents' Work Status

	Parents working		Total (%)	N (unweighted)
	Not all working (%)	All working (%)		
English Proficient	33.4	66.6	100.0	16,550
Limited English proficient	63.7	36.3	100.0	1,220

Source: GAO analysis of ECLS-K data.

Table 11: Percentages of English Proficient Parents and Parents with Limited English Proficiency, by the Number of Different Types of Child Care Used, among Those Using Care

	Number of different types of child care used, among those using care			N (unweighted)
	One (%)	Two or more (%)	Total (%)	
English proficient	72.3	27.7	100.0	12,732
Limited English proficient	81.6	18.4	100.0	584

Source: GAO analysis of ECLS-K data.

Note: Each difference between families with limited English proficiency and other families in tables 6-11, except for the category of high school graduates, is significant at the 95 percent confidence level.

In tables 12 through 15 we show what the adjusted effect of parents' limited English proficiency is on the likelihood of their child (1) receiving any nonparental child care, (2) receiving financial assistance for child care, (3) receiving center-based care, and (4) participating in Head Start, when we estimate its effect using logistic regression models to control for the effects of the other factors. In the first two columns of each table, we show the unadjusted effect of parents' limited English proficiency on each outcome across all racial/ethnic groups, and what the adjusted effect looks like when we control for race or ethnicity and other factors. In the third and fourth columns of each table, we show the unadjusted and adjusted effect of parents' limited English proficiency for Hispanics, and in the last two columns we show those same effects for Asians. Separate analyses were done only for Hispanics and Asians because, as table 6 shows, the percentage of children of other races whose parents have limited English proficiency was very small. For the adjusted models, we also show the effects of the other factors that we controlled for, such as income and education, on the four outcomes. In the case of variables that have multiple categories (such as race or ethnicity, income or poverty status, education, and number of persons in the household over 18 years of age), the odds ratios indicate how much more or less likely the categories of families indicated are to have each outcome than the reference (or omitted) category. The reference category for race or ethnicity is white, the reference category for poverty status is less than 100 percent of the federal poverty level, the reference category for education is less than high school graduate, and the reference category for the number of persons in the household over 18 is one.

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Likelihood of receiving any nonparental care. Table 12 shows that before adjusting for other factors, the effect of parents’ limited English proficiency on the likelihood of receiving any type of nonparental childcare was negative and significant for all groups considered together, and for Hispanics and Asians considered separately (odds ratios of 0.28, 0.38, and 0.40, respectively). After controlling for these other factors, the differences between children of parents with limited English proficiency and other parents in terms of their receipt of any type of child care were smaller for all groups considered together and for Hispanics (odds ratios of 0.77 and 0.75, respectively), but not statistically significant among Asians (odds ratio of 0.85). While almost all of the control variables attain statistical significance in the model that included all racial and ethnic groups, the statistical significance of individual control variables in the models including only Asian or Hispanic children varies.

Table 12: Odds Ratios from Logistic Regression Models Used to Estimate the Effects of Different Factors on the Likelihood of Receiving Any Child Care, after Adjusting for Other Characteristics

	All groups		Hispanics		Asians	
	Unadjusted	Adjusted	Unadjusted	Adjusted	Unadjusted	Adjusted
Limited English proficient	0.28*	0.77*	0.38*	0.75*	0.40*	0.85
White		Ref				
Black		1.19**				
Hispanic		0.87*				
Asian		0.81*				
Other		0.86				
< 100 percent poverty		Ref		Ref		Ref
100–200 percent poverty		1.09		1.15*		0.66*
> 200 percent poverty		2.19*		1.96*		1.88*
< High school graduate		Ref		Ref		Ref
High school graduate		1.44*		1.53*		1.48
> High school graduate		2.26*		2.16*		1.79
1 Person over 18		Ref		Ref		Ref
2 Persons over 18		0.65*		0.72*		0.83
More than 2 persons over 18		0.77*		0.89		0.81
All parent(s) work		3.16*		3.17*		3.24*
Head Start		0.38*		0.48*		0.22*

Source: GAO analysis of ECLS-K data.

* denotes significance at the 95 percent level.

** denotes significance at the 90 percent level.

Note: “Ref” refers to reference categories.

Likelihood of receiving financial assistance for child care. Table 13 shows that before adjusting for other characteristics, the odds ratios estimating the effect of parents' limited English proficiency on the likelihood of receiving financial assistance for child care were 0.60, 0.46, and 1.95 for all groups together, Hispanics, and Asians, although the result for Asians was not statistically significant. While other factors were significantly related to the likelihood of receiving financial assistance for child care, controlling for their effects did not markedly diminish the estimated difference between children of parents with limited English proficiency and other children overall, or for Hispanics or Asians. After other factors are taken into account, children of parents with limited English proficiency were about half as likely as others to receive financial assistance overall and among Hispanics (odds ratios of 0.41 and 0.44, respectively), but among Asians the difference was not statistically significant (odds ratio = 1.85).

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Table 13: Odds Ratios from Logistic Regression Models Used to Estimate the Effects of Different Factors on the Likelihood of Receiving Financial Assistance for Child Care, among Those in Any Care, after Adjusting for Other Characteristics

	All groups		Hispanics		Asians	
	Unadjusted	Adjusted	Unadjusted	Adjusted	Unadjusted	Adjusted
Limited English proficient	0.60**	0.41*	0.46*	0.44*	1.95	1.85
White		Ref				
Black		1.64*				
Hispanic		1.36*				
Asian		0.75				
Other		2.73*				
<100 percent poverty		Ref		Ref		Ref
100–200 percent poverty		0.68*		0.64*		8.40*
>200 percent poverty		0.18*		0.25*		2.83
< High school graduate		Ref		Ref		Ref
High school graduate		1.12		1.26		0.21
> High school graduate		0.92		1.23		0.37**
1 person over 18		Ref		Ref		Ref
2 persons over 18		0.42*		0.27*		0.09*
More than 2 persons over 18		0.51*		0.21*		0.09*
All parent(s) work		1.31*		1.13		1.66
Head Start		1.83*		1.95*		3.34
Center-based care		2.16*		1.63		1.64
Multiple types of care		1.46*		1.65*		2.20**

Source: GAO analysis of ECLS-K data.

* denotes significance at the 95 percent level.

** denotes significance at the 90 percent level.

Note: “Ref” refers to reference categories.

Likelihood of receiving center-based care. Table 14 shows that before adjusting for other factors, the effect of parents’ limited English proficiency on the likelihood of receiving center-based child care among those who received any type of child care was significant when all racial/ethnic groups were considered together (odds ratio = 0.44), and significant for Hispanics (odds ratio = 0.73) but not for Asians (odds ratio = 0.92). None of the differences between children of parents with limited English proficiency and other children were statistically significant, however, after we controlled for other factors.

**Appendix II: Analyses of the Effects of
Limited English Proficiency on Child Care and
Early Education Patterns**

Table 14: Odds Ratios from Logistic Regression Models Used to Estimate the Effects of Different Factors on the Likelihood of Receiving Center-Based Care, among Those in Any Care, after Adjusting for Other Characteristics

	All groups		Hispanics		Asians	
	Unadjusted	Adjusted	Unadjusted	Adjusted	Unadjusted	Adjusted
Limited English proficient	0.44*	0.98	0.73*	0.83	0.92	1.10
White		Ref				
Black		0.98				
Hispanic		0.61*				
Asian		0.77*				
Other		0.53*				
<100 percent poverty		Ref		Ref		Ref
100–200 percent poverty		0.98		1.05		0.89
>200 percent poverty		1.72*		1.37*		1.46
< High school graduate		Ref		Ref		Ref
High school graduate		1.36*		1.17		0.59
> High school graduate		2.45*		1.94*		1.15
1 person over 18		Ref		Ref		Ref
2 persons over 18		1.06		0.95		0.76
More than 2 persons over 18		0.64*		0.78		0.23*
All parent(s) work		0.39*		0.33*		0.51*
Head Start		0.18*		0.26*		0.17*
Multiple types of care		9.81*		8.50*		17.66*

Source: GAO analysis of ECLS-K data.

* denotes significance at the 95 percent level.

** denotes significance at the 90 percent level.

Note: “Ref” refers to reference categories.

Likelihood of participating in Head Start. Table 15 shows that before adjusting for other factors, children of parents with limited English proficiency had higher odds of participating in Head Start when all ethnic/racial groups were considered together (odds ratio = 1.39). The same was true when Asians were considered separately (odds ratio = 3.81), but no significant effect of parents’ limited English proficiency was found for Hispanics (odds ratio = 0.98). After controlling for other characteristics, children of parents with limited English proficiency had significantly lower odds of participating in Head Start when all racial/ethnic groups were considered together (odds ratio = 0.67), and when Hispanics were considered separately (odds ratio = 0.69), but significantly higher odds among Asians (odds ratio = 1.90).

**Appendix II: Analyses of the Effects of
Limited English Proficiency on Child Care and
Early Education Patterns**

Table 15: Odds Ratios from Logistic Regression Models Used to Estimate the Effects of Different Factors on the Likelihood of Participating in Head Start, after Adjusting for Other Characteristics

	All groups		Hispanics		Asians	
	Unadjusted	Adjusted	Unadjusted	Adjusted	Unadjusted	Adjusted
Limited English proficient	1.39*	0.67*	0.98	0.69*	3.81*	1.90*
White		Ref				
Black		3.21*				
Hispanic		1.75*				
Asian		1.57*				
Other		2.69*				
<100 percent poverty		Ref		Ref		Ref
100–200 percent poverty		0.66*		0.72*		0.69**
>200 percent poverty		0.18*		0.22*		0.18*
< High school graduate		Ref		Ref		Ref
High school graduate		1.19*		1.43*		0.53**
> High school graduate		0.71*		0.90		0.46*
1 person over 18		Ref		Ref		Ref
2 persons over 18		0.82*		0.87		0.94
More than 2 persons over 18		0.74*		0.91		0.60
All parent(s) work		0.97		1.09		0.69**

Source: GAO analysis of ECLS-K data.

* denotes significance at the 95 percent level.

** denotes significance at the 90 percent level.

Note: "Ref" refers to reference categories.

Appendix III: Comments from the U.S. Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES
Office of the Assistant Secretary, Suite 600
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

JUL 28 2006

Ms. Marnie S. Shaul
Director, Education, Workforce, and
Income Security Issues
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Ms. Shaul:

Attached are comments of the Administration for Children and Families on the Government Accountability Office Draft Report entitled, "Child Care and Early Childhood Education: More Information Sharing and Program Review by HHS Could Enhance Access for Families with Limited English Proficiency" (GAO-06-807).

Should you have questions or need additional information, please contact Shannon Christian, Associate Director, Child Care Bureau, at 202-260-2309 or Channell Wilkins, Director, Office of Head Start, at 202-205-8573.

Sincerely,

A handwritten signature in black ink that reads "Wade F. Horn for".

Wade F. Horn, Ph.D.
Assistant Secretary
for Children and Families

Enclosure

COMMENTS OF THE ADMINISTRATION FOR CHILDREN AND FAMILIES ON THE GOVERNMENT ACCOUNTABILITY OFFICE DRAFT REPORT ENTITLED, "CHILD CARE AND EARLY CHILDHOOD EDUCATION: MORE INFORMATION SHARING AND PROGRAM REVIEW BY HHS COULD ENHANCE ACCESS FOR FAMILIES WITH LIMITED ENGLISH PROFICIENCY" (GAO-06-807)

The Administration for Children and Families (ACF) appreciates the opportunity to comment on the Government Accountability Office (GAO) draft report on this important topic.

GAO Recommendations

To help State and local agencies plan for needed language assistance and assess whether they provide meaningful access to eligible children, regardless of their parents' English ability, we recommend that CCB work with states to help them explore cost-effective strategies for collecting data on CCDF subsidy recipients' language preference or English proficiency and comparing these data with available information on community demographics. Once these data are available, HHS may consider collecting information on existing cost-effective ways that agencies could use to provide language assistance and to recruit providers who speak other languages, as well as disseminating this information in the locations where the data show the greatest need.

To provide opportunities to parents with limited English proficiency for accessing Federal child care subsidies for their children, we recommend that HHS develop and implement specific steps to review whether and how States provide access to CCDF programs for eligible children of parents with limited English proficiency, as well as provide information to help states evaluate their progress in this area. Specifically, HHS should

- revise the CCDF plan template to require states to report on how they will provide meaningful access to parents with limited English proficiency seeking CCDF subsidies for their children, and
- systematically review states' program eligibility criteria for CCDF subsidies to ensure that states comply with HHS policies related to participation by children of parents with limited English proficiency.

ACF Comments

In prior years, the Child Care Bureau (CCB) has used the annual Child Care and Development Fund (CCDF) appropriation for child care research and evaluation to fund State Child Care Data and Research Capacity Projects in a number of States (Connecticut, Maine, Massachusetts, Oregon, Rhode Island, and Wisconsin). While these projects did not specifically focus on services to families with limited English proficiency, they assisted State CCDF Lead Agencies in developing greater capacity for

policy-relevant research and analysis. Within each project, the primary goal was to create a Statewide research infrastructure to better understand child care needs, services, and outcomes for families in the context of social, economic, and cultural change. We will consider funding similar projects in the future, as well as other efforts to capture relevant information on the supply and demand of child care services. We are also planning to use other research projects, including our multi-State evaluation of child care subsidy strategies using experimental design, to address issues related to serving families with limited English proficiency.

In July 2006, CCB launched a new technical assistance initiative focusing on CCDF administration. Through a partnership between the Urban Institute and CCB's National Child Care Information Center, the project will provide State CCDF Lead Agencies with technical assistance on strategies that promote child care subsidy access and retention. The project will disseminate information about effective strategies identified by the Urban Institute research in seven mid-western States, as well as supplemental information provided by other States. The strategies fall into eight key policy areas—one of which is assisting parents with language barriers. Strategies in this area include making documents available in other languages, using translators at local offices, and using computer programs to track the native language of clients. Other policy areas identified by the initial Urban Institute research have an impact on services to all families, including families with language barriers. These policy areas include linking subsidies to other social service programs; improving customer service practices; simplifying the application process; simplifying recertification requirements; simplifying reporting requirements; minimizing subsidy breaks; and assisting parents with fluctuating and non-traditional work schedules. The technical assistance provided under this project will focus on strategies that are practical and maintain program integrity.

CCB appreciates this suggestion and will examine the feasibility of using the CCDF plan template for the next biennial cycle to require States to report on efforts to promote access to parents with limited English proficiency.

ACF Overall Comment on the Report

We believe that the report could have benefited from additional contextual discussion about the complex array of factors that impact families' decisions related to child care. Factors such as family preferences, child care supply, and immigration status—rather than just the characteristics of the subsidy program itself—may impact families' choices and participation in the subsidy system.

The National Study of Child Care for Low-Income Families (conducted by Abt Associates for ACF) suggests that Hispanics often prefer a family, friend, or neighbor provider because of the congruence with language and cultural beliefs, and because they trust that the provider will care for their children as they personally would. In addition, low-income, minority populations tend to live in communities with a high concentration of people with similar backgrounds. Social supports, including child care by family, friends, and neighbors, are an important component of many such communities.

Availability of formal care offered by providers that speak their language and share their cultural beliefs is often rare in these communities. Given that low-income, minority populations frequently work in the service and retail sectors, many communities lack formal providers who can provide care during the non-traditional and rotating hours that these jobs typically require. Furthermore, research suggests that recent immigrants are fearful of contacting social services agencies, even when they are aware of their eligibility for benefits. While the GAO report acknowledges immigration issues, the data from the Early Childhood Longitudinal Study, Kindergarten Class of 1998-99 (ECLS-K), do not allow GAO to control for "length of residence in the U.S." or "immigration status."

In light of this complexity, we have serious questions about the report's analysis of ECLS-K data. The ECLS-K information is outdated (representing the situation in 1997) and limited to a narrow group of children (reflecting only the year before children enter kindergarten). Furthermore, the data do not allow GAO to control for a number of potentially key variables that impact the likelihood of child care subsidy receipt, including State of residence or geographic location, CCDF policies (such as family co-payment, reimbursement rate) that vary by State, the availability of State-funded pre-kindergarten programs, family preferences regarding non-parental care, length of residence in the U.S., and immigration status. We believe that the GAO report places too much emphasis on the findings of the ECLS-K analysis (for example, by devoting all of Appendix II to the analysis), without adequately acknowledging its limitations.

Finally, it is unclear to us why the GAO report examines the impact of limited English proficiency on the likelihood that the child care provided was in a center-based facility versus a non-center-based facility (such as Table 13 on page 61). A rationale for this analysis and further explanation of the findings would have been useful. The CCDF program promotes parental choice, enabling families to choose any legally operating setting that best meets their needs.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contacts

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Staff Acknowledgments

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