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## *Legislators as Lobbyists*

Public policy is produced by elected and unelected officials and through the interactions of branches of government. We consider how such interactions affect policy implementation and representation. We argue that legislators try to influence bureaucratic decisions through direct communication with federal agencies, and that such contact is effective and has consequences for policy outcomes. We provide empirical evidence of this argument using original data about direct communication between members of Congress and the U.S. Department of Labor (DOL) along with decisions made by the DOL regarding trade and redistributive policies. We find that direct contacts influence DOL decisions, and the agency is more likely to *reverse* previous decisions when requested to do so by legislators. Our results challenge key assumptions and findings in the previous literature and have important implications for interbranch relations and informal means of control over the implementation of national policy.

My constituents don't need a go-between to get my attention. Why do you waste your money on a lobbyist when I'm being paid to be your senator? I was for anything that benefits West Virginia, and I was always going to be supportive.  
(Senator Robert Byrd (D-WV), 1989)

The conventional understanding of representation focuses on the relationship between legislators and their constituents. Yet, public policy is made and implemented by both elected and unelected officials and through the interactions of institutions and branches of government. Congress, for example, is dependent on federal agencies to implement legislation (Dodd and Schott 1979; Eskridge and Ferejohn 1992; Lowi 1969), but agencies also have the incentive to build support among the many diverse interests within Congress to safeguard their budgets and programs (Arnold 1979; Carpenter

2001; Fiorina 1977). Does this interdependent relationship influence policy outcomes and, consequently, the quality of representation?

The question of whether representatives in Congress are responsive to constituents also depends on the responsiveness of bureaucrats to legislators. However, previous literature has largely focused on a single institution in isolation and less on how the interactions or linkages between institutions effect representation.<sup>1</sup> One critical reason for this oversight is the difficulty of establishing the linkages between elected officials, federal agencies, and output.

The ability to establish such linkages is important for evaluations of representation and democratic accountability. The federal bureaucracy has a wide-reaching role and discretion in the policymaking process. Policy is now overwhelmingly made through agency regulation more than through statute (Warren 2004). Moreover, policies are often complex, requiring several agencies, levels of government, and programs in order to be fully promulgated as intended. This presents a costly but critical challenge for our understanding of how the interactions between institutions affect representation but also the ability of citizens to hold elected officials accountable.

In this article, we take a step toward advancing the study of these complex linkages using novel data that allow us to study the links between elected officials, agency behavior, and policy outcomes. We examine, first, whether members of Congress directly lobby the bureaucracy to represent their constituents. Second, we evaluate agency responsiveness to legislators' requests. Examining these linkages allow us to test theoretical arguments about interbranch interactions and representation.

We theorize about the role of direct communication within the interdependent relationship between legislators and agencies. Legislators act as lobbyists for their constituencies by representing their district's and state's interests through direct communication with agencies. Agencies have an incentive to respond favorably to legislators because they want support in Congress to protect their budgets and priorities. Agencies also want to avoid angering legislators by appearing unresponsive. Thus, agencies favor legislators who signal strong preferences over decisions made by the agency via direct contact. Consequently, this interdependent relationship affects policy outcomes, advantaging interests represented by legislators' contact with agencies.

Using original data we obtained by submitting Freedom of Information Act (FOIA) requests, we offer systematic evidence of

legislators' influence over agency decisions through direct communication, consistent across both the House and Senate. These data allow us to examine the linkage between the expressed preferences of legislators over agency decisions in order to provide a direct test of legislator influence. We examine the direct communication between members of Congress and the U.S. Department of Labor (DOL) along with the trade adjustment assistance (TAA) decisions made by the DOL between 2005 and 2012.

TAA decisions are an appropriate case for testing legislators' influence because the outcomes are supposedly based on objective, evaluative criteria. Departing from previous literature focused on grants and discretionary allocations, trade adjustment assistance is funded by mandatory spending. The TAA program assists U.S. workers who have lost, or may lose, their jobs as a result of foreign trade. When a business or plant closes, the company, a labor union, or a group of affected workers may submit a petition to the DOL requesting assistance (e.g., job training, temporary income). The DOL then decides whether the workers lost their jobs due to foreign trade and either certifies (i.e., approves) or denies the petition. In our sample, a single TAA petition has the potential to affect over 5,000 workers.

We collected data on more than 17,300 petitions submitted regarding TAA during the time period, representing more than 1.1 million affected workers. We also obtained and hand coded the universe of the contact records (27,310) by members of Congress with the DOL. We identified whether a contact is associated with a specific TAA petition using a unique petition number.

Across different empirical specifications—including congressional district and product-type fixed effects to account for differences across geography and industry as well as using propensity score matching—we find that legislators' contacts in support of TAA petitions have a positive impact on the petition approval rate. Of critical importance, we confront possible issues of endogeneity using a unique research design. We find that, among petitions that were initially denied, the DOL actually *reverses* negative decisions at higher rates when members of Congress contact the DOL requesting a reconsideration.

Taken together, our results demonstrate that legislators take advantage of the bureaucracy's discretion by attempting to influence agency decisions and that they are often successful. This suggests that legislators use the bureaucracy as a backdoor for representing their constituencies (Ritchie 2018). Moreover, recent

empirical studies show that interest groups target members of Congress to influence the bureaucratic rule-making process (You 2017). Our article offers a potential mechanism indicating why contacting members of Congress may be an effective way for interest groups and voters to influence bureaucratic decisions.

Our findings also have implications for evaluations of policy-making power in Congress. While the *structure and process* literature has focused on the influence of congressional leadership and members who serve on the committee with oversight of a federal agency (McCubbins, Noll, and Weingast 1987, 1989), our results suggest that serving on the committees that oversee the DOL or holding a leadership position does not have significant influence over decisions about petitions. Instead, agencies strategically respond to legislators who make contact. This suggests that direct contact with agencies could provide a way for legislators with less institutional authority to overcome the unequal power distribution in Congress.

### **Interbranch Interactions and Representation**

A substantial literature explaining the relationship between Congress and the federal bureaucracy has focused largely on the loss and preservation of legislative control through delegation and oversight. Congress pursues a variety of tools to maintain control of the bureaucracy, including agency design and procedure (Balla and Wright 2001; McCubbins, Noll, and Weingast 1987, 1989), committee oversight (Aberbach 2001; Shipan 2004), and fire alarms (McCubbins and Schwartz 1984).

However, this dominant debate has overshadowed an important strategic behavior: individual legislators taking advantage of the bureaucracy's discretion for their own political gain. While some previous literature describes a mutually beneficial relationship between legislators and agencies, generally focused on casework and grants, this work has either not provided empirical evidence or has left the mechanism of influence unclear. For instance, Fiorina's (1977) prominent work describes how members of Congress benefit from the bureaucracy's complexity by performing "unsticking services" for constituents (e.g., expediting Social Security checks). However, testing such a theory has proven challenging in the absence of data on the interactions between legislators and agencies.

On the supply side, scholars have considered how agencies make decisions, usually about the geographic distribution of federal funds. This research has found that agencies strategically

privilege legislators with influence over the agency, whether as members of committees with oversight (Arnold 1979; Heitshusen 2001; Rich 1989), the majority party (Kernell and McDonald 1999; Levitt and Snyder 1995), or key positions for building coalitions (Arnold 1979; Carpenter 2001). For example, Arnold (1979) finds that agencies favor legislators with influence over the agency's budget and programs when allocating funds geographically. Likewise, literature in American political development describes legislators' involvement in the creation of rural free delivery, and bureaucrats' responsiveness to legislators, whether as contracted agents of the majority party (Kernell and McDonald 1999) or as a political strategy to gain autonomy by cultivating support (Carpenter 2001). Alternative explanations for agency decisions point to presidential particularism (Berry, Burden, and Howell 2010; Hudak 2014; Kriner and Reeves 2015) and ideological proximity to agency appointees (Bertelli and Grose 2009).<sup>2</sup>

Yet, this literature neglects an important, frequent behavior influencing agency decisions. Members of Congress often contact agencies directly about matters ranging from casework, grant requests, and broader policy issues (Ritchie 2015, 2018). However, the extant empirical literature offers skepticism as to whether such direct requests actually influence agency decisions.

The few studies (Mills, Kalaf-Hughes, and MacDonald 2016; Neiheisel and Brady 2017) that have examined the relationship between direct requests from legislators (often referred to as "lettermarks") and agency decisions find weak evidence of congressional influence. Mills, Kalaf-Hughes, and MacDonald (2016), for instance, find legislators' letters have limited influence over the closing of air traffic control towers, conditional on the preferences of the agency. Neiheisel and Brady also find weak evidence of legislators' requests, only apparent for extreme members of the president's party, and conclude "that most legislators do not appear to have benefitted from writing Lettermarks to the bureaucracy" (2017, 5). Neither study finds legislators' requests have influence on agency decisions independent of the agency's preferences or ideology.

Moreover, some have even argued that legislators are being deceptive when they take credit for influencing agency decisions. For instance, scholars (e.g., Grimmer, Westwood, and Messing 2015; Stein and Bickers 1994, 1995) have focused on electoral outcomes and how legislators credit claim for distributive benefits awarded by agencies, arguing that legislators' requests to agencies

do not effect agency outcomes. In line with Fiorina (1977), there is evidence that legislative politics influences the *timing* of agency responses (Anagnoson 1982; Grimmer, Westwood, and Messing 2015; Lowande, n.d.), but not that agencies' willingness to expedite responses also extends to the *outcomes* of agency decisions. Some scholars (e.g., Anagnoson 1982; Grimmer, Westwood, and Messing 2015) find, for instance, evidence that agencies use the timing of grant announcements to benefit legislators, but they express doubt about legislators' influence over decision outcomes.

We consider two questions. First, do legislators make specific requests to agencies, and, second, how do agencies respond to such requests? We argue that individual members of Congress directly communicate with agencies to influence bureaucratic decisions. Such direct requests offer two strategic benefits to legislators. First, they allow them to act on behalf of their constituencies in a manner that is outside of and unconstrained by the legislative process (Ritchie 2015, 2018). Second, direct requests, often in the form of letters or phone calls, offer a traceable, credible device for credit claiming (Fiorina 1989; Ritchie 2015, 2018), which can elude legislators' ability to link their efforts to other policy outcomes (Arnold 1990; Lee 2003, 2004; Mayhew 1974).<sup>3</sup>

When legislators reach out to agencies with requests, it signals to agencies both the legislator's preference and that the request is a priority for the legislator. Agencies have an incentive to respond favorably to legislators' requests in order to build coalitions of support for their budgets and programs but also to avoid retribution in the form of committee hearings and additional scrutiny if they are unresponsive. Agencies are risk averse and want to avoid angering a legislator by appearing unresponsive to the legislator's request.

Why would agencies be responsive to requests from rank-and-file, minority-party legislators who are not on committees with oversight? Being unresponsive to any legislator could produce costs for an agency. Even legislators who are not members of committees with oversight can reprimand agencies by introducing legislation that is unfavorable to the agency, attacking the agency in the press, and voting against the agency's interests.<sup>4</sup> Agencies have a clear motivation to respond favorably when legislators make requests in order to avoid these costs, perhaps even when such requests contradict decisions agencies would make based on objective criteria.<sup>5</sup> Risk-averse bureaucrats want to be responsive to a legislator, irrespective of institutional status, committee membership, or party, if they have the discretion and

resources. Thus, agencies use their discretion to make decisions that are responsive to requests of legislators.<sup>6</sup>

Departing from much of the previous work, we test our theory using agency decisions related to a program funded by mandatory spending that are not constrained by limited funding. TAA decisions are made based on evaluative criteria, similar to Social Security or Medicare (Collins 2015). This is an important distinction from the cases examined in previous work, much of which has focused on competitive grants or other discretionary benefits and limited resources with zero-sum outcomes.<sup>7</sup> We suspect that discretionary grants and other limited resources are more likely to attract the attention of presidential and majority party politics, incurring pressure on bureaucrats to ensure benefits are distributed based on these powerful principals' electoral concerns. Limited resources may also force agency decision making to increase reliance on expertise and policy preferences (see Mills, Kalaf-Hughes, and MacDonald 2016). In the case of TAA, bureaucrats have greater latitude to make decisions that will favor the agency's interest of being responsive to legislators' requests. This case has important implications since most policy decisions, like TAA, are not grants and discretionary benefits.<sup>8</sup>

In fact, strong systematic, empirical evidence of both the demand and supply side of the strategic interactions between individual members of Congress and federal agencies has yet to be presented. We offer evidence that legislators' requests influence agency decisions by combining two unique data sets. Critically, this finding suggests that individual legislators can affect policy outcomes for their constituencies by representing them outside of the legislative venue.

### **Data and Stylized Facts**

Our analysis focuses on the effect of congressional communication with federal agencies on those agencies' decisions. To provide empirical evidence of this relationship, we utilize two main sets of data. First, we collect data on the direct communication between members of Congress and agencies. We submitted Freedom of Information Act (FOIA) requests to the U.S. Department of Labor (DOL) to obtain records of communication (e.g., letters, faxes, emails, meetings) from House members and senators to the DOL. The records included details such as dates, names of legislators, and summaries of their communication.

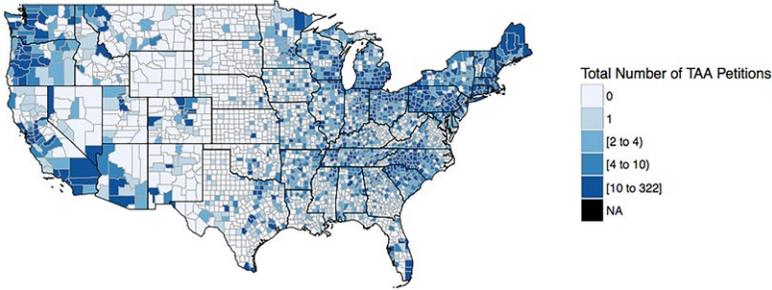
The documents contained records of over 28,000 contacts between members of Congress and the DOL from 2005 to 2012. Legislators contact agencies like the DOL for a variety of reasons, including to influence policy decisions (Ritchie 2018), to assist constituents with casework, or to affect the distribution of federal expenditures (Fiorina 1977; Mills, Kalaf-Hughes, and MacDonald 2016; Neiheisel and Brady 2017). At other times, legislators contact cabinet secretaries to wish them a happy birthday or offer congratulations. We focus on when legislators contact the DOL in support of a particular TAA petition. Among the contacts with the DOL, 1,262 mention a specific petition number.

To measure the responsiveness of bureaucratic decision making, we examine the DOL's decisions on TAA petitions. We focus on the TAA program because petition decisions are supposedly based on a clear set of objective criteria following an investigation by the DOL.<sup>9</sup> Congress created the Trade Adjustment Assistance Program with the passage of the Trade Expansion Act of 1962 to help U.S. workers and firms that have been negatively affected by trade liberalization by providing job training, temporary income, and other assistance. To be considered under this program, a petition must be filed with the DOL by or on behalf of a group of workers who have lost or may lose their jobs or experienced a reduction in wages as a result of foreign trade.<sup>10</sup> A petition may be filed by a group of workers, an employer, a union, a state workforce official, or an American Job Center operator/partner. The Office of Trade Adjustment Assistance (OTAA) investigates the case to determine whether foreign trade was an important cause of job loss. If the OTAA certifies the case, petitioners may apply to their state workforce agency for benefits and services.<sup>11</sup>

We obtain all TAA petitions submitted between 2005 through 2012 from the DOL website.<sup>12</sup> Petitions include the name of the employer; location of a firm; whether the petition is made by workers, the company, or a union; Standard Industrial Classification (SIC); estimated number of affected workers; decision; and decision date. In total, there were 17,309 petitions made during the period, and 75% of them were approved. Figure 1 presents the total number of petitions by county between 2005 and 2012.

The average estimated number of workers affected by foreign trade for each petition is 88 and over 1.13 million workers in total were represented by petitions during the period.<sup>13</sup> Out of the total number of petitions, 40% were submitted by

FIGURE 1  
TAA Petitions By County, 2005–12 [Colour figure can be viewed  
at [wileyonlinelibrary.com](http://wileyonlinelibrary.com)]



companies, 30% by workers, 18% by state agencies, and 10% by unions.<sup>14</sup>

Table 1 presents the summary statistics of county-level characteristics by TAA petition status. We divide counties into three groups: (1) counties that did not submit a TAA petition between 2005 and 2012, (2) counties that submitted less than four petitions during the period, and (3) counties that submitted more than or equal to four petitions during the period, which represent the top 25% counties in terms of TAA petition submission. Counties that are associated with more TAA-related petitions tend to have higher trade shocks from China and higher manufacturing share of employment. They are also more Democratic-leaning than counties with zero or fewer petitions in terms of presidential vote share and the party affiliations of senators and the House of Representatives.

Workers sometimes receive congressional help to accompany their petitions. Members of Congress contact the DOL in support of petitions submitted for workers in their districts and states (for example, see Senator Kirsten Gillibrand's letter, Figure A3 in Appendix A of the online supporting information). Legislators ask the DOL to certify petitions, citing various rationales. Some legislators even ask the DOL to reconsider or overturn previous denials of petitions.

For example, on May 6, 2008, Senator Olympia Snowe (R-ME) wrote to the DOL requesting that the agency "reconsider [the] decision not to give TAA benefits for 70 displaced workers" at the Fraser Timber Limited Sawmill in Ashland, Maine.

TABLE 1  
County Characteristics by TAA Petition Status

	Positive TAA Petition		
	No TAA Petition	Petition < 4	Petition ≥ 4
Number of County	1,359	876	890
(ln) Population	9.3	10.3	11.5
White Ratio	0.76	0.78	0.77
Less than High School Ratio <sup>a</sup>	0.50	0.50	0.46
(ln) Per Capita Income	10.05	10.04	10.13
Unemployment (%)	7.1	8.2	8.3
White Unemployment (%)	6.1	7.2	7.3
China Shock <sup>b</sup>	2.52	4.23	4.82
Manufacturing Share <sup>c</sup>	0.18	0.25	0.27
Foreign-Born Ratio	0.04	0.03	0.06
Republican Presidential Vote Share 08	0.61	0.57	0.52
Republican Presidential Vote Share 12	0.64	0.60	0.54
Republican Presidential Vote Share 16	0.71	0.66	0.59
Trump Republican Primary Vote Share 16	0.45	0.44	0.45
Sanders Democratic Primary Vote Share 16	0.42	0.42	0.45
Share of Democratic House Member <sup>d</sup>	0.33	0.37	0.49
Share of Democratic Senate Member <sup>e</sup>	0.36	0.40	0.40

*Note:* Demographic variables are eight-year averages from 2005 to 2012.

<sup>a</sup>Ratio of adult population in a district with high school or less than high school education.

<sup>b</sup>Change in Chinese import exposure per worker, 1990–2007 (Autor, Dorn, and Hanson 2013).

<sup>c</sup>Ratio of manufacturing employment share in county from County Business Patterns (CBP).

<sup>d</sup>Ratio of Democratic House of Representatives who served districts located in a county from 2005 to 2012. If a county includes multiple districts, we take the average among districts.

<sup>e</sup>Ratio of Democratic senators who served a state where each county is located from 2005 to 2012.

Senator Snowe was referring to a petition (TAW Number: 62718) that the DOL denied on March 14, 2008. By May 13, the DOL had overturned its previous denial and certified the petition.<sup>15</sup>

Of course, members of Congress take credit for their efforts on behalf of workers, particularly when petitions are successful. Congressional offices often disseminate press releases, containing the text of the letter or quotes from their conversation with the DOL, in order to notify their constituents of their legislators' work. Once the congressional office is notified of a successfully certified petition, another press release is sent out announcing the good news with headlines such as "At Gillibrand Urging, Department of Labor Will Provide Trade Adjustment Assistance for Laid-Off Electromark Workers" (Gillibrand 2014). Clearly, members of Congress want constituents to believe that their legislators' efforts are effective. We consider the validity of such claims by establishing direct evidence of congressional influence that considers both the demand from legislators and the response from agencies.

We read the summaries of the communication to identify contacts about TAA. We categorize the contact as *TAA Contact* if the contact was specifically related to a TAA petition or the TAA program (see subsequent section for our method of matching each contact with the particular TAA petition mentioned in the contact). For each member, we measure the total number of DOL contacts and *TAA Contacts*. A senator makes, on average, 31 contacts with the DOL and makes about 1.5 TAA-related contacts in each Congress. A House member makes an average of 8.6 contacts with the DOL per Congress and 0.3 TAA-related contacts per Congress. There is significant variation in the contact frequency across the Senate and the House.

Explaining the variation in TAA-related contact across legislators is important in our efforts to understand the disparity in the degree to which constituencies are represented at the DOL. Tables A9 and A10 in Appendix C of the online supporting information that report the relationship between members' characteristics and TAA-related contact reveal some surprising relationships.

First, while previous work on Congress and the bureaucracy has assumed that interbranch interactions are primarily concentrated among the agency and the committees with oversight, our results suggest otherwise. Across both the House and Senate, membership on a committee with oversight is not positively associated with the frequency of contacts with the DOL (in general or specifically about TAA), contrary to conventional wisdom.

Likewise, holding a leadership position is not associated with contact with the DOL.

Instead, district characteristics and voting against trade agreements predict the frequency of contacts. For House members, demographic factors including the ratio of the white population, educational attainment, and the manufacturing-sector employment are positively related to the TAA-specific contacts. For senators, the density of the senior population and public-sector unions in the state are positively associated with senators' TAA-specific contacts. Not surprisingly, House members and senators who tend to vote against free trade bills contact the DOL more frequently about TAA. Overall, these results suggest that members' interbranch advocacy is a sign of responsiveness to constituency demand.

If such contacts have value and are not very costly, why don't all legislators contact the DOL? Legislators face limited time and resources and selectively allocate resources across issue areas and representational activities (Bernhard and Sulkin 2017). For example, some legislators focus on legislating while others devote staff and resources to constituency service. Moreover, while nearly all members of Congress contact the federal bureaucracy, their contact with particular agencies varies based on the issue area within the agency's jurisdiction, the issue priorities of the legislator, and constituency concerns (Ritchie 2015, 2018).

### **Congressional Contacts and TAA Decisions**

In this section, we examine the relationship between legislators' requests and the DOL's response to those requests. We match a legislator's contact in support of a petition with the DOL's decision on the petition using a unique TAA petition number. In cases in which a specific petition number was not included in the contact summary, we use other identifying information (e.g., the company name, city, product produced, plant number) in the contact summary to identify the specific petition described in the contact.<sup>16</sup>

We acknowledge that congressional contacts may not be random and this nonrandomness could bias our results, and we take several steps to address potential bias. It is possible that constituents contact their representative for help when they believe their petition will have difficulty getting approval based on eligibility criteria alone. This would cause an underestimation of the effects

of congressional contacts on TAA decisions, offering a conservative test of our hypotheses.

However, it is also plausible that unmeasured characteristics related to the quality of petitions could cause an overestimation of the effects of legislator intervention. Perhaps, for example, legislators are more likely to contact the DOL if they think the petition from their constituents has a good chance to be approved. Another possibility is that petitioners with greater resources and capabilities produce higher-quality petitions and also have the political connections and savvy to reach out to their legislator for support.

To address these concerns, we adopt the following strategies. First, we include a year fixed effect to control aggregate time trend. Second, we might imagine that particular industries affected by trade may be more likely to obtain legislator support as well as preference from the DOL. For example, perhaps the steel industry benefits from political support, but, also, the case for the steel industry is easier to make based on the TAA criteria. To address this possibility, we include the Standard Industry Classification (SIC) fixed effect. Third, some theories might suggest that petitions coming from competitive districts and states are more likely to get preference from the DOL (or via the controlling party in Congress). Electorally vulnerable legislators might be more motivated to actively support petition cases for purposes of claiming credit. To capture time-invariant differences across petitioners' districts, we include a district fixed effect. To capture time-variant political characteristics of districts, we also include vote shares of the district's representatives and several other related controls, including sharing the president's party affiliation and majority party in the House and Senate.

We take additional measures to address possible variation in the quality of petitions. To be clear, however, the actual petition forms and procedure leave little room for variation in terms of petitioners' ability to build a convincing case. To the contrary, the application process places the burden on the DOL to investigate the circumstances of each case rather than on the petitioners' ability to be persuasive.<sup>17</sup> The application form primarily asks only for contact information that the DOL then uses to collect relevant information and evaluate the petitions based on the TAA criteria (Collins 2015). As presented in the examples of the petition forms in Appendix A of the online supporting information (Figures A1 and A2), the petition forms are short and do not allow petitioners

much space to make arguments on their behalf.<sup>18</sup> Consequently, while the circumstances (e.g., reason for decline in production, number of workers affected) of various cases may differ substantially, the actual petitions do not.

To measure the quality of petitions, we include three variables. First, we include a dummy variable that indicates whether a petition mentioned competition with a specific foreign country as a cause of layoffs on the petition form. Given that TAA is supposed to help workers who lost their jobs due to international trade, a petition that clearly indicated the country of competition could be an indication of the quality or strength of the petitioners' case and have a higher likelihood to be approved by the DOL. Of all petitions, 42.3% mentioned a specific foreign country as a cause of layoffs.

Second, petitioners with greater resources and capacity may be more likely to contact their legislator and also produce higher-quality petitions. One way of addressing this issue is by controlling for the type of petitioner. Compared to groups of workers, it is likely that companies have greater resources and information that improves the quality of their petitions and facilitates legislator support. Companies may be more likely to take the time to submit petitions only when the case for assistance is strong. Also, the DOL may view petitions from companies as more legitimate than worker-initiated petitions.

Third, the estimated number of workers may indicate the quality of the petition. Legislators may also be more likely to intervene in cases where a large number of workers face unemployment, perhaps due to more local news coverage of a business closing. We have information about the estimated number of workers affected by international trade in each petition for 80% of the cases.<sup>19</sup>

We estimate the following model:<sup>20</sup>

$$\text{TAA Approval}_{ijst} = \alpha_j + \alpha_s + \alpha_t + \beta * \text{TAA Contact}_{ijt} + \Gamma X'_{ijt} + \varepsilon_{ijst}, \quad (1)$$

where  $i$  indicates each TAA petition,  $j$  indicates the congressional district where the petitioner's employer is located,  $s$  indicates the petitioner's firm's product type (Standard Industry Classification (SIC) 2 digit), and  $t$  indicates year.<sup>21</sup> The outcome variable is whether the DOL approved the TAA petition, and the variable  $\text{TAA Contact}_{ijt}$  indicates TAA-related DOL contact

by a legislator(s) from a petitioner's district and/or state. We use two measures for the *TAA Contact* variable. First, we use the total number of members' contacts on each petition (*Direct TAA Contact*). This captures direct contact on each petition. Second, we subtract the total number of TAA-related contacts from House members from a petitioner's district or senators from a petitioner's state from the total number of direct contacts on each petition in each year (*Indirect TAA Contact*). Although those contacts may not address specific petitions, these indirect communications also may affect the approval decision of petitions from a district where their representatives were active in contacting the DOL regarding TAA.<sup>22</sup>

$X'$  includes time-varying district-demographic variables, TAA case-specific variables such as a petitioner type, and the total number of non-TAA-related DOL contacts made by House and Senate members who represent the district or state where petitioner  $i$ 's district  $j$  is located in year  $t$ . It also includes characteristics of members of Congress, such as committee assignment and majority-party status.<sup>23</sup> Table 2 presents the results.

First, Columns (1) and (2) show that direct TAA-related contact by legislators is significantly associated with the likelihood of petition approval. One more contact from a legislator regarding the petition is associated with a 2.5% higher approval rate. When we use a dummy variable indicating whether there is any direct TAA contact for a petition, as presented in Column (3), the approval rate for that petition is on average 7.8% higher than for petitions with no contact from legislators. Column (4) presents the results when we include the number of affected workers as a control. The main results hold and the number of affected workers is significantly and positively associated with the likelihood of petition approval, suggesting that the DOL considers the extent of the impact of factory closings when making TAA decisions.<sup>24</sup>

However, the usual variables for policymaking power, such as leadership positions and committee membership with oversight of the agency, are not associated with the approval rate. Given that agencies want to protect their budgets (e.g., Arnold 1979; Carpenter 2001; Fiorina 1977), it is possible that legislators' membership in the Appropriations or Budget Committee may affect the DOL's decision. This is not the case. We also do not find an association with majority-party membership or presidential

TABLE 2  
DOL Contacts and TAA Approvals

	(1)	(2)	(3)	(4)
Direct TAA Contact	0.0323 <sup>***</sup> (3.15)	0.0247 <sup>**</sup> (1.99)	0.0780 <sup>***</sup> (3.78)	0.0498 <sup>**</sup> (2.29)
Direct TAA Contact Dummy				
Indirect TAA Contact		-0.000344 (-0.25)	-0.000331 (-0.24)	-0.00126 (-0.73)
House Non-TAA DOL Contact		0.000974 (0.87)	0.000984 (0.87)	0.0000553 (0.05)
Senate Non-TAA DOL Contact		0.0000446 (0.23)	0.0000463 (0.24)	-0.0000153 (-0.07)
Senate Leadership <sup>a</sup>		0.0178 (1.21)	0.0182 (1.24)	-0.0186 (-1.08)
Senate HELP Committee <sup>b</sup>		-0.00595 (-0.32)	-0.00651 (-0.35)	-0.0212 (-0.97)
House Leadership <sup>c</sup>		-0.00609 (-0.25)	-0.00597 (-0.24)	0.00770 (0.29)
House EW Committee <sup>d</sup>		-0.0105 (-0.44)	-0.0112 (-0.47)	-0.0121 (-0.37)
Foreign Country Mentioned		0.359 <sup>***</sup> (42.90)	0.359 <sup>***</sup> (42.81)	0.383 <sup>***</sup> (39.65)
Petition by Worker <sup>e</sup>		-0.0468 <sup>***</sup> (-6.08)	-0.0467 <sup>***</sup> (-6.09)	-0.0519 <sup>***</sup> (-6.28)
(ln) Estimated No. of Workers				0.0355 <sup>***</sup> (11.17)
Demographic Controls	N	Y	Y	Y
Member Characteristics Controls	N	Y	Y	Y
Year FE	N	Y	Y	Y
District FE	N	Y	Y	Y

(Continues)

TABLE 2  
(Continued)

	(1)	(2)	(3)	(4)
SIC FE	N	Y	Y	Y
N	17,309	15,601	15,601	12,746
Adj. ( $R^2$ )	0.001	0.305	0.305	0.368

Note. *t* statistics in parentheses. Standard errors are clustered at the congressional district level. \*\* $p < 0.05$ , \*\*\* $p < 0.01$ .

<sup>a</sup>Whether senators who represented a petitioner's state were in leadership positions.

<sup>b</sup>Whether senators who represented a petitioner's state were assigned to the Senate Health, Environment, Labor, and Pension Committee, which oversees the DOL.

<sup>c</sup>Whether a House member who represented a petitioner's congressional district was in a leadership position.

<sup>d</sup>Whether a House member who represented a petitioner's congressional district was assigned to the House Education and Workforce Committee, which oversees the DOL.

<sup>e</sup>1 if a petition is submitted by workers. Other control variables are included in the regression, but the results are not fully reported here. For the full results, see Table A11 in Appendix D of the online supporting information.

copartisanship. Table A11 in Appendix D of the online supporting information presents the results.

It is possible that the agency's responsiveness to requests is conditioned by legislator characteristics. TAA-related contact from a member of the majority party or the president's party may be more effective than other TAA-related contacts. We explore this possibility, and we find no support for this conjecture. The results are reported in Table A12 in Appendix D of the online supporting information.<sup>25</sup>

Interestingly, neither indirect TAA contact nor the total number of non-TAA-related contacts from members are significantly associated with TAA approval. This suggests that the DOL is very precise in its response to a member's direct request.<sup>26</sup>

Although we include year, House district, and product-type fixed effects, the possibility of unmeasured characteristics associated with both legislator intervention and TAA approval present a challenge for our ability to draw inferences from our results. To address this issue, we use a research design that exploits the unique data, allowing us to limit the confounding influence of unmeasured variables and offering greater confidence in our findings. We present additional evidence that shows the effect of legislators' direct communication on agency decisions: DOL reversals of negative petition decisions. Workers who are denied eligibility for TAA may request reconsideration of the determination. Petitioners who were approved may sometimes ask for reconsideration to expand the coverage of TAA benefits. Among 17,309 cases in our sample, 2,334 cases were reconsidered for various reasons. We analyzed each case that was reconsidered to determine how the final decision had changed from the initial decision.<sup>27</sup> Of the reconsidered petitions, 22% of the cases confirmed the initial decision, 56% granted more coverage than in the initial decision, and 14% overturned the initial decision, from denial to approval.

By examining reversals of negative DOL decisions, we are able to limit the confounding influence of unmeasured characteristics, such as variation in petition quality, attributes of petitioners, demographic and political characteristics of the district/state, and other sources of endogeneity. We examine whether originally denied TAA petitions are more likely to be overturned if legislators contact the DOL regarding the reconsideration of the case.

The DOL's decision to deny these petitions offers a deterministic assignment mechanism that we can use to reduce the influence of unmeasured characteristics (e.g., petition quality, intrinsic advantages of petitioners, district characteristics, etc.) when examining which petitions' decisions are reversed. Estimating the intervention effect on the petitions that were originally denied allows us to mitigate the influence of unobserved characteristics because all such petitions, following an investigation by the DOL, were determined not to fulfill the standards of the stated criteria used to evaluate petitions. For instance, since the petitions were all initially denied, it suggests that they are all of an insufficient quality, offering us greater confidence that our results are due to the effect of congressional contact and not solely to petition quality. Any other advantages these petitions might have possessed, such as a well-resourced petitioner, a representative affiliated with the president's party, or an electorally important constituency, were also insufficient for the petition to have been approved initially, suggesting that they alone do not explain the subsequent decision reversal.

But do petitioners or members of Congress who contact the DOL on behalf of petitioners offer additional information to strengthen their cases? What reasons does the DOL give for reversing its previous decision to deny a petition? Revised decision notices generally offer vague statements such as "the Department received new information" or that "the petitioner supplied additional information" as the rationale for overturning the initial negative determination (TAW Numbers: 62864, 63981). However, the initial application process involves an investigation by the DOL, including contacting relevant actors in the investigation, so it is not clear why such information was not discovered during the initial investigations. In other cases of reversed decisions, the revised determination notice (with the rationale for the overturned decision) is not available and, contrary to standard procedure, does not even seem to have appeared in the *Federal Register* (e.g., TAW Number: 62718).

We exploit information on the timing of the contact and the DOL decision. We identify whether a contact from a member occurred *after* the initial decision by the DOL on the petition. Out of 2,334 petitions, 116 petitions were associated with the member's contact after the initial decision on the case. TAA-related

contacts that take place after the initial DOL decisions are requests for reconsideration of the petitions. Among all petitions reconsidered, we compare the overturn rate of petitions with members' contact to petitions with no such contact. In the regression, for the reconsidered petitions, we also control the number of direct contacts, if any, made prior to the initial decision. Among 116 petitions that are associated with a member's contact for reconsideration request, 22 petitions were associated with a member's contact that was made before the initial decision. Table 3 presents the results.

When the DOL received contacts about petitions from members of Congress after an initial denial (*Direct TAA Contact After Initial Decision*), petitions were about 30% more likely to be overturned and approved than the reconsidered petitions without legislator contact to the DOL. Due to the nonrandomness of the agency contact, it is difficult to establish causality. However, the fact that the relationships are robust even after controlling for petitioners' product type, districts characteristics, and time trend, and overturned decisions are not common, suggests that legislators' direct communication with agencies may have a powerful influence on bureaucratic decisions. Critically, our research design examining petitions the DOL denied offers a deterministic assignment mechanism we use to reduce the influence of unmeasured characteristics on our estimates of the effect of legislator intervention.

Petitions that are associated with contacts from members of Congress before the DOL's initial decision (*Direct TAA Contact Before Initial Decision*) are less likely to be overturned from denial to approval. This intuitively makes sense. From the results presented in Table 2, we know that a member's contact increases the approval rate for petitions. These 22 petitions that were initially denied *despite* contacts from legislators to the DOL may be of a lower quality or include less justifiable cases. Therefore, it is not surprising that these petitions have lower overturn rates in the reconsideration process. Similar to the results on the initial decision, indirect contacts, non-TAA-related DOL contacts, committee membership, or leadership positions are not associated with the DOL's decisions to overturn. This also offers strong evidence that bureaucrats are responsive only to members who clearly reveal their preferences through direct communication regarding agencies' decisions

TABLE 3  
DOL Contacts and Overturn of TAA Initial Decisions

	(1)	(2)	(3)	(4)
Direct TAA Contact After Initial Decision	0.319*** (5.06)	0.320*** (5.15)	0.312*** (4.17)	0.253*** (3.09)
Direct TAA Contact Before Initial Decision	-0.104*** (-5.17)	-0.0779*** (-3.59)	-0.0802*** (-2.77)	-0.0966*** (-2.74)
Indirect TAA Contact		0.00310 (1.26)	0.000810 (0.45)	0.00203 (0.19)
Senate Non-TAA DOL Contact		0.000674** (2.08)	0.000756 (1.44)	0.0000372 (0.05)
House Non-TAA DOL Contact		-0.00176 (-0.91)	-0.00180 (-0.73)	0.00204 (0.46)
Senate Leadership			-0.0384 (-1.25)	-0.0865 (-1.86)
Senate HELP Committee			0.0958 (1.60)	0.0588 (0.67)
House Leadership			0.0643 (1.26)	-0.000949 (-0.16)
House EW Committee			0.0913 (1.64)	0.106 (1.43)
Foreign Country Mentioned			-0.0922*** (-5.19)	-0.0877*** (-4.17)
Petition by Worker			0.0615*** (2.86)	0.0223 (0.87)
(ln) Estimated No. of Workers				0.00597 (0.98)
Demographic Controls	N	Y	Y	Y
Year FE	N	Y	Y	Y
District FE	N	N	Y	Y
SIC FE	N	N	Y	Y
<i>N</i>	2,335	2,335	2,332	1,613
Adj. <i>R</i> <sup>2</sup>	0.027	0.073	0.120	0.117

*Note.* *t* statistics in parentheses. Standard errors are clustered at the congressional-district level. For a full set of controls included in the regression, see Table A16 in Appendix B of the online supporting information. \*\*  $p < 0.05$ , \*\*\*  $p < 0.01$ .

### Conclusion

Federal agencies are among the most important political actors of American governance. Yet, even while agency decisions affect public policy more so than statute itself (Warren 2004), these decisions are the most neglected and least understood aspects of policymaking. Despite the enduring debate over presidential and congressional control over the bureaucracy, scholars have largely overlooked and underestimated the influence of informal communication between agencies and individual legislators.

We use novel data to offer empirical evidence that members of Congress can influence decisions made by federal agencies via direct communication. We show that when members of Congress contact the DOL in support of TAA petitions, the approval rate is higher than when petitions are adjudicated without legislators' intervention. Moreover, House members' and senators' contacts requesting the reconsideration of a petition after the initial DOL decision are positively associated with the DOL overturning its initial TAA decision, from denial to approval.

When legislators claim credit for efforts to secure favorable agency decisions, it is not just cheap talk. In fact, our findings suggest that direct communication can be an effective strategy for legislators to exploit bureaucratic discretion.

Contributing insight into agency decision making, we identify a mechanism of responsiveness and illustrate a process by which bureaucrats make efficient decisions: by responding to legislators' explicit requests. Our findings suggest that bureaucrats use explicit requests from members of Congress as a signal of a legislator's preference intensity. Bureaucrats fulfill legislators' requests to build support in Congress and to avoid the negative repercussions of angering legislators by not being responsive to their requests. While these findings suggest that unelected bureaucrats are responsive to elected representatives, the normative implications are not wholly positive; bureaucrats may consider legislators' preferences over objective criteria.

Our results cast doubt on assumptions of the extant literature about the importance of the individual-level characteristics of legislators. Interestingly, we do not find evidence that agencies favor members of leadership or committees with jurisdiction over the agency. This departs from literature that emphasizes the institutional power of legislators to control the bureaucracy (e.g., Arnold 1979). We also do not find that agencies are more

responsive to requests from majority-party legislators or presidential copartisans, suggesting that while these legislators may enjoy expedited responses (Lowande, n.d.), this advantage may not extend to the actual outcomes of decisions. Critically, our results suggest that *any* legislator—even legislators who lack power within the chambers of Congress—can improve outcomes for their constituencies through efforts in the bureaucratic venue.

These findings depart from previous literature in two additional ways. First, much of the previous work has omitted consideration of direct requests between legislators and agencies when empirically analyzing agency decisions (but see Mills, Kalaf-Hughes, and MacDonald 2016; Neiheisel and Brady 2017). Second, we go beyond previous work, which has focused on grants and other discretionary allocations, by examining the case of trade adjustment assistance, a redistributive program funded by mandatory spending. Our examination of this case offers an important contribution by examining agency decision making when bureaucrats are not as restricted by competing principals' interests over limited resources. Of course, agency responsiveness may vary across agencies and types of decisions, and we think that it is likely that institutional power and electoral politics may play a greater role in other cases, particularly when discretionary grants and allocations are involved. Still, we argue that this case study contributes insight into the countless, important nondistributive policy decisions agencies manage beyond the discretionary grant programs examined in previous work.

Questions remain regarding the pervasiveness of inter-branch interactions across agencies, issues, and agency decisions. While we limit the focus of this study to DOL decisions on TAA, we suspect bureaucratic responsiveness to legislators' communication extends beyond TAA, even to other types of back-channel policymaking (Ritchie 2018). Moreover, our findings could lend insight into the other informal strategies legislators use to influence agencies. If, as we argue, agencies are responsive to legislators' requests in order to avoid retaliation, our results suggest that committee oversight is not the only means legislators have to punish agencies. Indeed, angering any legislator could be costly for an agency since legislators can introduce bills that are unfavorable to agencies and attack agencies in the press. Yet, we know little about how legislators use these informal strategies and reserve such examinations

as important subjects for future work. Together, these interbranch dynamics can inform and advance our understanding of Congress, the bureaucracy, evaluations of representation, and the quality of governance.

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## NOTES

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1. Notable exceptions include Carpenter (2001), Kernell and McDonald (1999), Mills, Kalaf-Hughes, and MacDonald (2016), and other important work (e.g., Arnold 1979; Epstein and O'Halloran 1999; Huber and Shipan 2002) that considers the effects of divided government and interbranch conflict on legislation or the distribution of expenditures.

2. Of course, there is an extensive literature on earmarks and federal grants that finds evidence of geographic distributions explained by committee influence (Crespin and Finocchiaro 2008; Evans 2004; Frisch 1998; Lazarus 2009; Lee 2003; Weingast and Marshall 1988), leadership power (Balla et al. 2002; Crespin and Finocchiaro 2008; Lee 2003), universalism, logrolling, and coalition building (e.g., Evans 2004; Ferejohn 1974; Lee 1998, 2000, 2003; Weingast 1994; Weingast and Marshall 1988), the majority party's interests (Balla et al. 2002; Lee 2003), credit-claiming challenges shaped by chamber differences (Lee 2003), and presidential electoral concerns (Berry, Burden, and Howell 2010; Hudak 2014; Kriner and Reeves 2015; Gimpel, Lee, and Thorpe 2012).

3. For example, while senators can credit claim for benefits from state-wide, formula-grant programs, House members are less credibly able to link their efforts to outcomes, and must share credit with the rest of the delegation (Arnold 1990; Lee 2003, 2004).

4. The authors are grateful to Jim Curry for providing insight regarding agency responsiveness to bill introductions.

5. This argument is consistent with an agency official's statement that the agency would try to "stretch the law" in order to be responsive to legislators' requests (Ritchie 2015, 58).

6. Additionally, a legislators' institutional rank, party status, and committee assignment can change. A rank-and-file legislator today could be a future member of leadership.

7. For example, one air traffic control tower remaining open means a tower in another legislator's district must close (see Mills, Kalaf-Hughes, and MacDonald 2016).

8. For example, think of agency decisions regarding enforcement, the implementation of rules, and regional and industry exceptions to regulations.

9. The TAA eligibility criteria include that the workers must have become separated from their employment or have been threatened with separation, and the role of foreign trade must be established by an increase in competitive imports, a shift of production to a foreign country, a decrease in sales to a TAA-certified firm, or by the U.S. International Trade Commission. For a comprehensive description of the criteria, please see Appendix F in the online supporting information.

10. Figures A1 and A2 in Appendix A of the online supporting information show a sample petition form.

11. <https://www.doleta.gov/tradeact/factsheet.cfm>

12. <https://www.doleta.gov/tradeact/DownloadPetitions.cfm>

13. Around 20% of petitions do not have estimated number of workers.

14. Table A4 in Appendix B of the online supporting information provides statistics on the total number of petitions and the approval rate by year. Table A5 in Appendix B presents statistics on the total number of petitions and the percentage of approved petitions by state.

15. While decisions on petitions are accompanied by an announcement, the DOL's reversal of this decision came with no explanation and does not even appear to have been announced in the *Federal Register*.

16. For example, Congressman Rick Boucher contacted the DOL in December 2008 in support of a petition. While the petition number is not included, the summary of the contact stated that the TAA assistance was for workers from a Gildan Activewear plant in Hillsville, Virginia that was to close on February 2, 2009, and that 180 displaced workers would be affected by the closing. It also notes that the workers produce Kentucky Derby Hosiery. This information allowed us to determine that the contact was referring to TAA petition, TA-W-64,705. We matched and coded each such contact and TAA petition by hand.

17. The investigation includes collecting information by contacting the firm, contacting customers of the firm, and state agencies. This link provides a description of the investigation process: <https://www.doleta.gov/tradeact/petitions.cfm>.

18. The petition form is only three pages long, including the first page, which is entirely composed of instructions. Most of the two pages include instructions and spaces where the petitioners fill in their contact information. While petitioners are allowed to include attachments to the petition forms, we had research assistants examine a sample of petitions submitted during 2011

and estimate that less than 1% of petitions (fewer than 10 out of 712) were over the standard three pages.

19. There are statistically significant correlations between whether a country that caused a layoff is mentioned and whether a company submitted a petition (coefficient = 0.16,  $t$ -stat = 18.6), and the (log-transformed) number of affected workers (coefficient = 0.037,  $t$ -stat = 12.96). However, there is not a strong correlation between a petition submitted by a company and the number of estimated workers (correlation = -0.04). There are two potential reasons to explain this. First, petitions that are not submitted by a company are often submitted by union organizations, and those petitions have a higher estimated number of workers (average = 108) than the estimated number of workers in petitions submitted by companies (average = 78). Second, the most common industry that appeared in petitions made by companies was Textile Mill Production (SIC2 = 22), which has a smaller employment than the industries that are most common in petitions made by workers or unions, which are Business Services (SIC2 = 73) and Industrial Machinery and Equipment (SIC2 = 35).

20. We use the ordinary least square (OLS) for the estimation. Given that the dependent variable is binary, OLS may not be proper. Therefore, we use a propensity score matching `teffects psmatch` command in Stata that uses a logistic treatment model. The results are robust to this estimation. For the results, see Table A15 in Appendix D of the online supporting information. Figure A5 shows that the propensity scores are well balanced between treated and untreated observations.

21. For robustness checks, we run the model with legislator fixed effect instead of a district fixed effect. We also run a model with industry  $\times$  district FE, which would control a district-specific industry shock instead of industry and district fixed effects. The results are reported in Tables A13 and A14 in Appendix D of the online supporting information. The results are consistent with the main results.

22. Imagine legislators made three contacts on the petition submitted by petitioner A, and there are 10 total TAA-related contacts from a district where A's firm is located. Among those 10 contacts, three contacts addressed A's petition and the other seven contacts addressed petitions that are submitted by other firms or workers from the same district as A. Under this scenario, *Direct TAA Contact* for A is coded as 3 and *Indirect TAA Contact* is coded as 7 (10-3).

23. For the full set of controls in the regression, see Table A8 in Appendix B of the online supporting information.

24. Mummolo and Peterson (2018) suggest that researchers need to consider a plausible variation in the treatment when fixed effects estimates are used to describe the substantive significance of the results. Given that the variation within unit is quite limited compared to variation across units, the coefficients of the interest from the fixed effect models may overestimate the substantive effect of the treatment if the plausible variation would be smaller than *a unit* change in the treatment. We follow Mummolo and Peterson's (2018) suggested

method to find relevant variation in the treatment and find that in our fixed effect framework (district, industry, and year FEs), as one standard deviation of TAA-related contact dummy (0.16) increases within an industry within a district over time, the related-TAA petition's approval rate would increase by 1.24%. Given that the fixed effects models use a limited variation of the treatment within a unit, the plausible effect of the treatment is smaller than what the raw number of coefficient would imply.

25. The results do indicate a significant, positive association with requests from Republican senators (although this partisan difference does not extend to the House). Since the DOL is thought to be a liberal agency (see, for example, Clinton and Lewis 2008), this result could suggest the agency is pursuing a vote-buying strategy or effort to appease the members of Congress who are most likely to retaliate (i.e., Republicans are more likely to have preferences that are at odds with the DOL) and have the greatest capacity to impose costs on the agency (e.g., senators attract more press attention, have greater leverage in the chamber, and confirmation authority). However, the robustness of our results while controlling for these legislator characteristics supports our theoretical argument that the agency has a general, risk-averse strategy of responsiveness to requests from any legislator.

26. Federal agencies also want to protect their programs (e.g., Arnold 1979; Carpenter 2001; Fiorina 1977). In the case of TAA, the program requires reauthorization by Congress. It is possible that bureaucrats at the DOL try to reward the petitions that come from the districts where members of Congress supported the TAA program extension, or try to buy off legislators who opposed the TAA program by approving petitions from their districts. We test this hypothesis in Appendix E of the online supporting information.

27. For each case reconsidered, there is a document attached showing the original decision and the final decision. For an example, see <https://www.doleta.gov/tradeact/taa/taadecisions/taadecision.cfm?taw=81846>.

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**Supporting Information**

Additional supporting information may be found in the on-line version of this article at the publisher's website:

Appendix A. TAA Petition Form and A Letter to DOL

Figure A1. TAA Petition Form

Figure A2. TAA Petition Form (continued)

Figure A3. Senator Gillibrand Letter

Appendix B. Summary Statistics

Table A1. Summary Statistics of DOL Contacts

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