

Thesis Presentation

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Thesis Question

- How and to what extent do business elites influence labor policy?
- Do business interest groups influence the content of labor regulations more than labor unions and worker advocacy groups?
- If so, what are characteristics of the organizations and their commenting strategies that may help them achieve their legislative objectives?
- Hypothesis: Business interest groups are more likely to achieve their objectives in labor regulations in the US than labor interest groups.

- Media coverage of policy issues heavily favors business interests over labor, prompting questions about how labor groups influence policy through other means (Danielian et al.)
- Charles Lindblom, an economist, theorizes that businesses hold structural power in the political landscape such that even ignoring influential political connections, lobbying, expertise and campaign support, legislators favor business interest simply because they deem business cooperation important in maintaining perceived economic stability, guaranteeing their re-election (M. Ambrosius et al.).
- This study examines how elite business organizations influence regulations proposed by labor-protective agencies like EEOC, OSHA, and NLRB, to assess whether businesses exert power even in regulatory spaces, revealing their structural influence on the political economy.
- Do this by analyzing comments made on proposed rules from these agencies during the notice and commenting period

Literature

- A Bias Towards Business? Assessing Interest Group Influence on the U.S. Bureaucracy.
Yackee and Yackee
 - Analyzed comments on bill proposal to determine extent of business elites influence based on policy outcome
 - Comments were used to determine Support
 - Comments were used for Content Analysis
- The Question of Interest Group Influence. Andreas Dür et al.
 - Difficulties in measuring influence, there are several pathways to influence
 - Need for mixed-method study to encompass all
 - Defines influence as control over policy outcomes: Preference Attainment Method
- Measuring Interest Group Influence Using Quantitative Text Analysis. Klüver
 - Explores Wordfish, Wordscores and Hand-coding for text analysis to find that wordfish works well for large scale studies, producing similar results as wordscores and hand-coding in determining policy positions

Methodology

Wordfish + Qualitative Comparative Analysis

Qualitative Comparative Analysis (QCA) is an evaluation approach that supports causal reasoning by examining how different conditions contribute to an outcome. It explores whether an outcome of interest is present across various configurations of conditions.

- **Regulations.gov → Comments**
- **Wordfish → who won?**
- **QCA → patterns in winning cases**

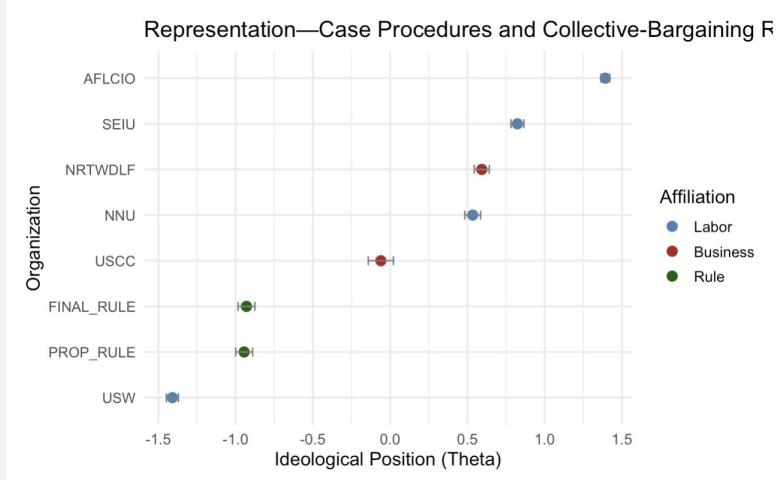
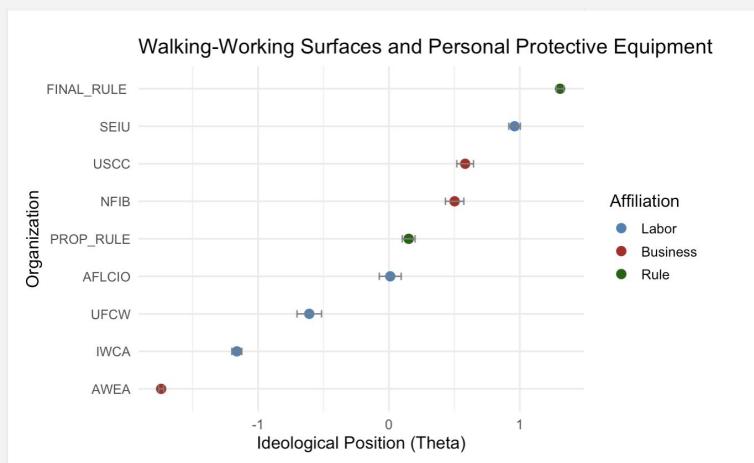
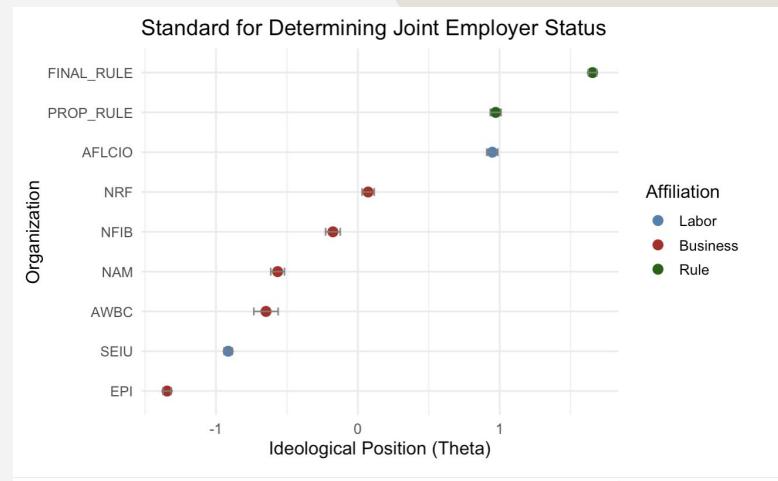
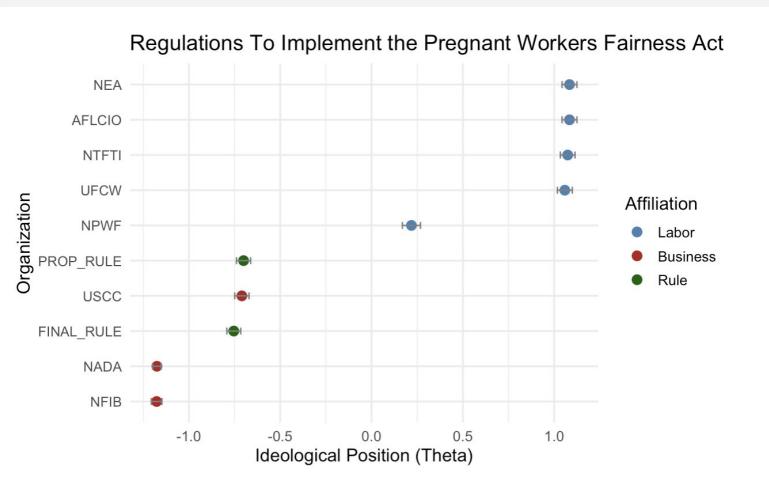
Wordfish is a computer program written in the R statistical language to extract political positions from text documents. Word frequencies are used to place documents onto a single dimension. Wordfish is a scaling technique and does not need any anchoring documents to perform the analysis. Instead, it relies on a statistical model of word counts. The current implementation assumes a Poisson distribution of word frequencies. Positions are estimated using an expectation-maximization algorithm. Confidence intervals for estimated positions can be generated from a parametric bootstrap. The name Wordfish pays tribute to the French meaning of the word “poisson”.

Labour Organisations	Business Organisations	
National Education Associations	The U.S. Chamber of Commerce	
Service Employees International Union	Business Roundtable	
AFL-CIO	National Restaurant Association:	
UAW	National Federation of Independent Business (NFIB)	
United Food and Commercial Workers International Union	National Association of Manufacturers (NAM)	
International Brotherhood of Teamsters (IBT)		
LIUNA		

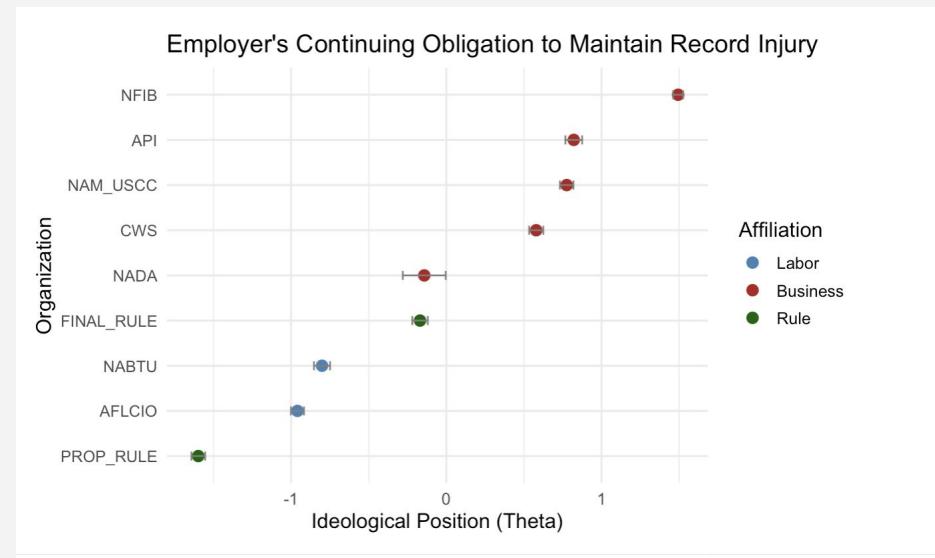
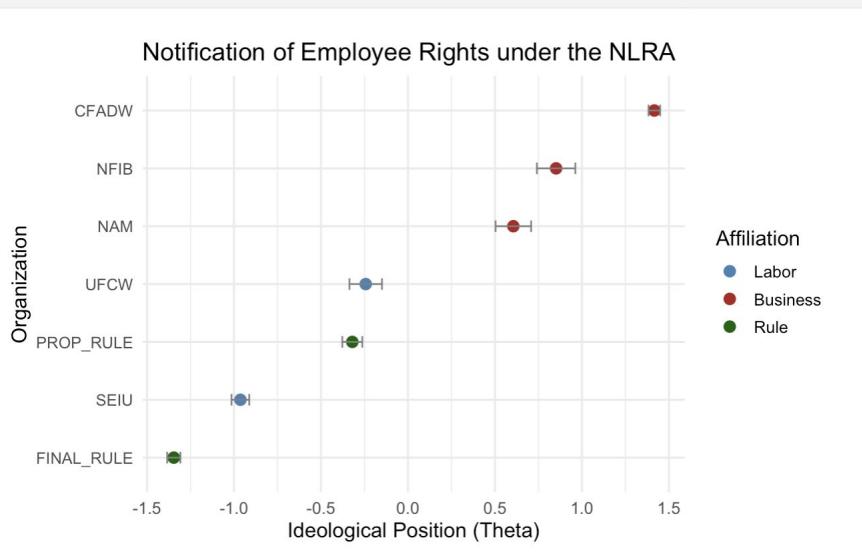
Organisation	Text	Labor
AFLCIO	The American Federation of Labor and Congress of Industrial Unions (AFL-CIO) submits these comments in support of the Equal Employment Opportunity Commission's ("EEOC" or "Commission") Notice of Proposed Rulemaking ("NPRM"), RIN 3046-AB30, Regulations To Implement the Pregnant Workers Fairness Act, published in the Federal Register on August 11, 2023. ¹	1
UFCW	The United Food and Commercial Workers International Union (UFCW) submits these comments in support of the Equal Employment Opportunity Commission's ("EEOC" or "Commission") Notice of Proposed Rulemaking ("NPRM"), RIN 3046-AB30, Regulations To Implement the Pregnant Workers Fairness Act, published in the Federal Register on August 11, 2023. ¹	1
NEA	The American Federation of Labor and Congress of Industrial Unions (AFL-CIO) submits these comments in support of the Equal Employment Opportunity Commission's ("EEOC" or "Commission") Notice of Proposed Rulemaking ("NPRM"), RIN 3046-AB30, Regulations To Implement the Pregnant Workers Fairness Act, published in the Federal Register on August 11, 2023. ¹	1
NFIB	The National Federation of Independent Business (NFIB) ¹ submits these comments in support of the Equal Employment Opportunity Commission's ("EEOC" or "Commission") Notice of Proposed Rulemaking ("NPRM"), RIN 3046-AB30, Regulations To Implement the Pregnant Workers Fairness Act, published in the Federal Register on August 11, 2023. ¹	0
USCC	The U.S. Chamber of Commerce ("Chamber") presents these comments to the Equal Employment Opportunity Commission ("Commission" or "EEOC") in response to its Notice of Proposed Rulemaking ("NPRM"), RIN 3046-AB30, Regulations To Implement the Pregnant Workers Fairness Act, published in the Federal Register on August 11, 2023. ¹	0
PROP_RULE	Federal Register / Vol. 88, No. 154 / Friday, August 11, 2023 / Proposed Rules 20000	2
FINAL_RULE	Federal Register / Vol. 89, No. 77 / Friday, April 19, 2024 / Rules and Regulations 20000	2
NADA	The National Automobile Dealers Association (NADA) ¹ respectfully submits the following comments in support of the Equal Employment Opportunity Commission's ("EEOC" or "Commission") Notice of Proposed Rulemaking ("NPRM"), RIN 3046-AB30, Regulations To Implement the Pregnant Workers Fairness Act, published in the Federal Register on August 11, 2023. ¹	0
NTFTI	The National Partnership for Women & Families appreciates the opportunity to comment in support of the Equal Employment Opportunity Commission's (EEOC's) proposed regulations and enforcement guidance implementing the Pregnant Workers Fairness Act (PWFA). As an organization dedicated to advancing women's health and well-being, NTFTI	1
NPWF	The National Partnership for Women & Families appreciates the opportunity to comment in support of the Equal Employment Opportunity Commission's (EEOC's) proposed regulations and enforcement guidance implementing the Pregnant Workers Fairness Act (PWFA). As an organization dedicated to advancing women's health and well-being, NPWF	1

Excel File with Comments

- Preprocessed → Run wordfish model to determine proposed rule and final rule policy positions
- 6 Cases



Who won: Shift from Prop_rule → Final_rule



First QCA: Subset of my dataset (30% random sample)

Case	Organisation	Labor_Group	High_Resource	High_Quality	Citations	High_Salient	Outcome
1	AFLCIO	1	1	1	0	1	1
1	NFIB	0	1	0	0	1	1
2	AFLCIO	1	1	1	1	1	0
2	NEA	1	1	1	1	1	0
3	SEIU	1	1	1	1	0	1
3	USCC	0	1	0	0	0	1
4	AWEA	0	1	1	1	0	0
5	CFADW	0	1	1	1	1	1
6	NAM	0	1	1	0	0	0
6	USCC	0	1	1	1	0	0
6	CWS	0	1	1	1	0	0

*imbalanced→ all are High Resource

Quality of a Comment (1 = Yes, 0 = No, ? = Unclear)	Category	Point
Does the commenter identify as an expert? (Lawyer, PhD, physicians, scientists etc.)	1	1
Is the comment longer than a page?	2	1
Comment format, is it a detailed report? (has a table of contents)	3	1
Cites several external sources including journal, scientific papers, research reports by re	4	1
Any additional attachments, like scientific studies?	5	1
Did they make more than one suggested change?	6	1
Quality of a Comment will be the sum of score		6

High Resource Group Yes = 1:

A national level umbrella organization OR

A union/business association with > 100,000 members OR

Commonly cited as a major lobbying organization

No= 1

Smaller NPO, advocacy group, local organization

OUT: output value

n: number of cases in configuration

incl: sufficiency inclusion score

PRI: proportional reduction in inconsistency

	Labor_Group	High_Resource	High_Quality_Comment	Citations	High_Salience_Rule	OUT	n	incl	PRI	cases
1	0	0	0	0	0	?	0	-	-	-
2	0	0	0	0	1	?	0	-	-	-
3	0	0	0	1	0	?	0	-	-	-
4	0	0	0	1	1	?	0	-	-	-
5	0	0	1	0	0	?	0	-	-	-
6	0	0	1	0	1	?	0	-	-	-
7	0	0	1	1	0	?	0	-	-	-
8	0	0	1	1	1	?	0	-	-	-
9	0	1	0	0	0	1	1	1.000	1.000	6
10	0	1	0	0	1	1	1	1.000	1.000	2
11	0	1	0	1	0	?	0	-	-	-
12	0	1	0	1	1	?	0	-	-	-
13	0	1	1	0	0	0	1	0.000	0.000	9
14	0	1	1	0	1	?	0	-	-	-
15	0	1	1	1	0	0	3	0.000	0.000	7,10,11
16	0	1	1	1	1	1	1	1	1.000	1.000
17	1	0	0	0	0	?	0	-	-	-
18	1	0	0	0	1	?	0	-	-	-
19	1	0	0	1	0	?	0	-	-	-
20	1	0	0	1	1	?	0	-	-	-
21	1	0	1	0	0	?	0	-	-	-
22	1	0	1	0	1	?	0	-	-	-
23	1	0	1	1	0	?	0	-	-	-
24	1	0	1	1	1	?	0	-	-	-
25	1	1	0	0	0	?	0	-	-	-
26	1	1	0	0	1	?	0	-	-	-
27	1	1	0	1	0	?	0	-	-	-
28	1	1	0	1	1	?	0	-	-	-
29	1	1	1	0	0	?	0	-	-	-
30	1	1	1	0	1	1	1	1.000	1.000	1
31	1	1	1	1	0	1	1	1.000	1.000	5
32	1	1	1	1	1	0	2	0.000	0.000	3,4

Resulting Recipes

```
M1: ~Labor_Group*High_Resource*~High_Quality_Comment*~Citations +
    ~Labor_Group*High_Resource*High_Quality_Comment*Citations*High_Salience_Rule +
    Labor_Group*High_Resource*High_Quality_Comment*~Citations*High_Salience_Rule +
    Labor_Group*High_Resource*High_Quality_Comment*Citations*~High_Salience_Rule <-> Outcome
```

- A business group, with high resources, writing a low-quality comment that doesn't cite anything : still wins.
- A business group, with high resources, writing a high-quality, well-cited comment on a high-salience rule: wins.
- A labor group, with high resources, writing a high-quality comment without citations, on a high-salience rule: wins.
- A labor group, with high resources, writing a high-quality, well-cited comment on a low-salience rule : wins.

Limitations

- Wordfish uses word frequencies to determine policy positions and not contextual information. So similarly worded documents are put together.
- Some other variables that might be useful in QCA: Coalition. The resource level of an organization doesn't matter if they work as a coalition.
- Some orgs policy position determined through wordfish is confusing (eg. SEIU)
- Several other channels of influence not taken into consideration, so this alone cannot be a measure of influence.

Thank You!