Research Statement
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Research Summary

My research program in public administration and American politics examines the impacts of political influences as well as organizational characteristics on the behavior and performance of government regulatory agencies. Following years of relative obscurity, the highly salient financial, environmental, and public health crises of the past few years have again made regulation a major topic of both scholarly and public attention. The spike in failures associated with regulated industries—including the worldwide financial collapse, the Gulf oil spill, and the Japanese nuclear crisis—have prompted renewed interest in evaluating the ability of current governmental regulatory systems to mitigate the potential for such disasters. Not only has interest in regulation increased, but so too have appeals for regulatory reform, calls which to date have been accompanied by substantial changes in the regulatory infrastructure.

Combining my training in political science and economics as well as my interests in public administration, political institutions, policy, political economy, and organizational economics, my scholarship examines both enduring questions of regulatory politics as well as new topics surfacing as a result of the recent disasters. I have written or am writing on topics ranging from assigning roles to regulatory capture and political control of government agencies in explaining the current disasters to how we can use crises in regulated industries to assess regulatory performance. My research incorporates a variety of methods including statistical analyses, case studies, and formal modeling to bring a well-rounded approach to the study of important questions associated with regulatory policy. Furthermore, my work reflects my view that through the simultaneous review of internal operations, external forces, and historical context, we can more clearly understand the behavior we observe at government agencies. Thus, my scholarship departs from most research in political science and public administration which approaches the study of government agencies from either the perspective of its political principals or its organizational behavior. In the context of the recent spike in failures of regulation, I believe, and my research supports the idea, that more balanced examinations are needed to make good policy choices in structuring agencies for better regulatory performance.

More information on my research is available at http://scholar.harvard.edu/carrigan.

Dissertation Project

My dissertation project, Regulatory Disaster and the Politics of Federal Agency Design, is focused on examining U.S. regulatory agencies that also simultaneously manage important non-regulatory functions. A central policy question surfacing in the wake of the aforementioned disasters has been how to organize regulating agencies such that they are encouraged to direct sufficient attention to their regulatory functions relative to the other responsibilities which they can be asked to fulfill. For example, the quest to identify the causes of the recent financial crisis
has focused attention on understanding how the Federal Reserve balanced its dual roles to regulate banks and conduct monetary policy. My research examines the effects on agency behavior and performance of such arrangements as well as the political forces that can explain why functions are combined in the first place. To study these issues, I incorporate data on a broad set of government agencies, case studies of the Minerals Management Service (MMS) and the Bureau of Alcohol, Tobacco and Firearms (ATF), and formal theory. I plan to defend my dissertation in April 2012 and continued to revise the associated manuscript for publication by 2014.

In Part 1 of the project, I demonstrate that examining issues particular to government agencies that combine regulatory and non-regulatory functions—which I refer to as multiple purpose regulators—is important for two primary reasons. First, the topic connects intimately to enduring questions of political science and public administration and can help us answer those questions. Second, the problems associated with such arrangements are not solely limited to the recent set of salient disasters in regulated industries. Chapter 1 focuses on linking the common arguments against multiple purpose regulators to several important themes in political science and public administration. I show how the recent policy discourse surrounding these failures relates to existing research on regulatory capture, political control of government agencies, goal ambiguity in public organizations, and theories of the policy process. In Chapter 2, I demonstrate that the performance problems associated with the multiple purpose regulatory institutions tied to the recent disasters are evident more broadly. The statistical results are the first to reveal that agencies that combine regulatory and non-regulatory functions generally perform worse in terms of the extent to which they achieve their performance goals. In Chapter 3, I show that although it is a contributing factor, the most commonly cited reason for why consolidating regulatory and non-regulatory tasks leads to poor performance—that their combination produces goal ambiguity and conflict—is not sufficient to explain the relatively poor outcomes. In other words, the presence of regulatory and non-regulatory functions in a single agency remains a significant predictor of performance even after controlling for goal conflict.

Part 2 builds on the findings of Part 1 through an examination of MMS, a now defunct agency of the Department of the Interior charged with regulating offshore oil and gas production prior to the tragic Gulf oil spill. The case reveals that combining, in one agency, regulatory and non-regulatory tasks associated with conflicting goals can still be optimal. While the goals themselves may conflict, the underlying tasks may require extensive coordination, thus limiting the effectiveness of the standard recommendation to break up such entities. Chapter 4 (enclosed) reveals that from the outset, MMS was structured to overcome previous failures in Interior oil and gas tax collection and offshore energy development efforts. These failures were the result of task subversion and neglect at the U.S. Geological Survey (USGS) and the Bureau of Land Management (BLM). Reviewing historical patterns of congressional oversight and budget decisions, I show that the common view that oil and gas revenue collection impeded effective offshore oversight is limited in its ability to explain regulatory laxity at MMS. The vast separation between the revenue management and offshore energy groups belies any simple conclusion that one overshadowed the other. Furthermore, given that MMS was originally structured in response to this same problem at USGS, the conclusion that collocation of revenue collection and regulation had less to do with the oil spill than is widely believed is not necessarily surprising. In Chapter 5, I examine the second stated source of conflict at MMS, that between its functions of regulatory oversight and offshore energy development. I show that
while the close interplay between the two functions fostered the conditions whereby regulation could be subverted for development, this structure was again chosen because of the widely cited inability of BLM and USGS to coordinate these tasks prior to MMS’s creation. Furthermore, MMS’s relative emphasis on development over environmental protection and safety was driven primarily by political pressure and public preferences rather than internal conflict at the agency.

In Part 3 (in progress), I both formalize the notion that multiple purpose regulators represent a balance between goal subversion and task coordination and test the model using data collected from ATF. The formal theory in Chapter 6 builds from the MMS case in Part 2 which demonstrated that agency structural decisions have implications for the relative mix of policies chosen. Furthermore, these decisions impact how efficiently policies can be implemented through their effects on the agency’s ability to coordinate tasks and overcome goal conflicts. Unlike most existing formal models of government agencies which begin with the assumption that the preferences of civil servants and their political principals diverge, my work shows that organizational choices have implications for policy outcomes that do not rely on creating this wedge in preferences. In Chapter 7, I analyze the political history of ATF to show how the agency developed into one organized around two functions in which the first focused on enforcement of firearms violations and the second on alcohol and tobacco regulation and tax collection. Further, I detail two recent organizational changes that can be used to test the formal model developed in Chapter 6. The first was a 1998 decision by the agency to more fully integrate the two functions, and the second was their separation through the 2002 Homeland Security Act. In Chapter 8, using monthly time series data collected on ATF audits, investigations, enforcement actions, and laboratory testing, I examine whether the reorganizations impacted operations. I expect the analysis to show that the restructurings affected outputs differently depending on the relative importance of goal conflict and task coordination to execution of each function. For example, in the latter reorganization which created the Alcohol and Tobacco Tax and Trade Bureau and moved the enforcement functions of ATF to the Department of Justice, I predict those activities where task coordination was important were harmed by the restructuring relative to those which were shown to be subverted through the historical analysis in Chapter 7.

Related Research

Supporting my dissertation research, I have several related projects recently completed or nearing completion. In a paper that appeared in the *Annual Review of Political Science* this past May, Cary Coglianese and I explore the connection between two distinct lines of research in regulatory politics which we label new institutionalism and new governance. The former is centrally concerned with the degree to which political principals influence the behavior of regulators. The latter focuses attention on the variety of approaches regulatory agencies can use to impact the activities of the regulated entities they seek to control. We show that despite their separation, the two research streams share broad commonalities that can enable each to inform the other. Although we call for greater integration of new institutionalism and new governance to encourage a more comprehensive understanding of the politics of the regulatory process, we also emphasize that recognizing the overlap between the two can advance both even if they continue to be pursued separately.

A second paper, currently undergoing final revisions, will be included in a Tobin Project manuscript entitled *Preventing Capture: Special Interest in Regulation, and How to Limit It*. The volume, edited by Dan Carpenter, Steve Croley, and David Moss, is scheduled for
publication in early 2012. In the chapter, I demonstrate that although initially convincing, the hypothesis that MMS’s capture by the oil and gas industry was instrumental in the Gulf oil spill is not as compelling when the evidence supporting the conclusion is viewed in the context of the agency’s institutional development. My research reveals that not only might less comprehensive conceptualizations of capture be more appropriate in describing the interplay between MMS and its regulated entities, but also that shifting public and political preferences—emphasizing energy development over environmental protection—limit how applicable the term is to describing the relationship. Furthermore, I show that such evidence ultimately renders determining whether MMS’s behavior reflected capture less consequential.

Cary Coglianese and I are also currently developing a chapter for another edited volume, *Regulatory Breakdown? The Crisis of Confidence in the U.S. Regulatory System*, slated for publication by Penn Press in 2012. In addition to contributing a chapter to the manuscript, I was also responsible for drafting the original book proposal and helping to secure the conference participants. In the paper, we explore how best to use disasters in regulated industries to assess regulatory performance. In addition to demonstrating how biases enter into such evaluations to overweight salient failures in the policy process, we argue that regulatory systems are susceptible to extreme events even when properly designed. We conclude by offering a series of recommendations for more appropriately evaluating regulation in light of the recent disasters.

**Future Research**

I plan to expand on my current work in a number of directions. Related to my interest in the operations of regulatory agencies, I have begun a major project to examine how heterogeneity in sources of civil servant motivation can help explain regulatory outcomes. Through this work, I expect to provide new evidence associated with two enduring puzzles of regulatory politics. The first relates to ascertaining both the degree to which regulators operate under the control of politicians as well as the effectiveness of associated political mechanisms such as directives, oversight hearings, and administrative procedures. The second centers on whether cooperative approaches to managing regulated entities produce meaningful results or merely reflect more sophisticated forms of capture.

My preliminary theoretical work shows how motivation, individually and collectively within the agency, can help us predict the degree to which government regulators will act with discretion. This research also demonstrates when collaborative regulatory relationships will tend to be productive. The fundamental idea is that if regulators are differentially interested in, for example, securing their jobs or promoting the agency mission, knowing these desires can help one determine how they will react to various political and institutional controls. Attention to such heterogeneity can simultaneously help reveal the difference between cooperative regulatory relationships that are productive in achieving social goals and those that mask more self-interested desires. To test the theory, a major portion of the research effort going forward will be in collecting original data. From a sample of U.S. regulatory agencies, I plan to measure sources of employee motivation by implementing surveys of agency employees using a series of personality questions and written scenarios designed to tease out motivation. These data can be gathered in conjunction with or independent of current Office of Personnel Management (OPM) surveys. Further, the information collected will be validated against OPM survey results, which contain indirect measures of government employee motivation.

With Cary Coglianese, I have also begun another large scale data collection effort aimed at providing the first systematic examination of the full lifecycle of regulatory activity. When
completed, the database will contain time series information on public law enactments, associated rulemakings, and enforcement activities for a subset of important U.S. regulatory agencies. Although recent research in political science has incorporated public data on rulemaking to provide new insights on topics such as delay in rulemaking and the effects of administrative deadlines, little is known about the processes before and after rulemaking takes place. This investigation will fill in these gaps to greatly expand the number of questions that researchers interested in such issues can answer.

In addition to using the database to study the regulatory process, the data collected will provide a new source to continue my dissertation research on the effects of collecting non-regulatory functions in regulatory agencies. Given that new laws often bring with them new agency responsibilities, the data will provide another source to systematically study how regulatory agencies react when charged to implement a more diverse set of functions. Preliminary data collection efforts have already shown the dramatic differences in the length of the regulatory lifecycle both between and within regulatory agencies. To support this data gathering as well as that associated with my survey project on sources of motivation in regulatory agencies, Cary Coglianese and I are currently developing a grant proposal which will be submitted at the end of 2011. This grant proposal will also include plans to conduct surveys periodically to amass longitudinal information on civil servant motivation.

I also plan to continue work on two smaller projects associated with my research agenda on regulatory politics. In the first, I demonstrate using panel data and a series of count data models how congressional subcommittee members impacted U.S. Department of Justice Antitrust Division price fixing prosecutions over a recent twenty year period. Examining enforcement over several presidential administrations, I further show how Executive Office preferences mitigated congressional influence, thereby demonstrating the interplay between political principals in influencing agency behavior. The second project uses a formal model to examine the various roles that managers can be asked to fulfill in public and private organizations. I show how the sources of civil servant motivation as well as the associated ability levels of the employees determine whether agency managers will be called to act as coaches, observers, or monitors.