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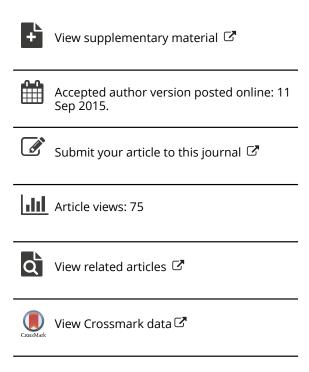
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A Bayesian partial identification approach to inferring the prevalence of accounting misconduct

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Abstract

This paper describes the use of flexible Bayesian regression models for estimating a partially identified probability function. Our approach permits efficient sensitivity analysis concerning the posterior impact of priors on the partially identified component of the regression model. The new methodology is illustrated on an important problem where only partially observed data are available – inferring the prevalence of accounting misconduct among publicly traded U.S. businesses.

Keywords: Bayesian inference, nonlinear regression, partial identification, sampling bias, sensitivity analysis, set identification.

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1 Introduction

This paper develops an approach for estimating partially identified parameters in nonlinear regression settings. Our approach is based on a decomposition of the probability function into an identified and a partially identified component (Kadane, 1975). This representation permits us to employ flexible (nonlinear) models when inferring the identified component; in our applications we utilize Bayesian tree-based priors for the regression functions (Chipman et al., 2010; Hill, 2012). For the partially identified portion of the model, informative priors are crucial, so checking the sensitivity of posterior inferences to model specification is vital. In our proposed framework, this sensitivity analysis is straightforward, and may be conducted under many different models for the partially identified parameters using only one set of samples from the marginal posterior of the identified parameters.

Our motivating application comes from the corporate accounting literature, where there is substantial interest in determining what fraction of U.S. firms engage in financial misconduct (such as misstated earnings); e.g. Dyck et al. (2013). Inferring the prevalence of misconduct is complicated by an inherent partial observability—not all cases of misconduct are discovered. Any treatment of this problem will therefore need to analyze how company attributes impact the probability of misconduct being discovered in addition to the probability of the misconduct itself taking place.

As further evidence of the generality of our approach, we also include a reanalysis of a published dataset (from a broken randomized encouragement study of flu vaccine) in the supplementary material.

The remainder of this section collects necessary background material, providing an overview of the concept of partial identification (specifically its treatment from a Bayesian perspective) and describing the empirical data we will analyze. Section 2 lays out our inferential framework and fixes notation. Section 3 describes the results of our data analysis. Section 4 concludes with a discussion.

1.1 Partial identification

A statistical model $p(y \mid \tau)$ indexed by a parameter $\tau \in \mathcal{T}$ is said to be *identifiable* or *identified* if parameter values correspond uniquely to distinct probability distributions over observables. That is, $p(y \mid \tau) = p(y \mid \tau')$ for all y if and only if $\tau = \tau'$. A model that is not identified is simply referred to as unidentified. The importance of identifiability as a modeling concern has its earliest roots in econometrics, the term first being introduced in Koopmans (1949). Other seminal references include Haavelmo (1943, 1944) and Koopmans and Reiersol (1950). Unidentifiability arises naturally in econometric analysis of observational data as a byproduct of imperfect measurement and/or various data censoring mechanisms. The Bayesian perspective on identifiability has been comprehensively reviewed in Aldrich (2002) and more recently in San Martín and González (2010).

The notion of *partial identifiability* or *partial identification* of parameters expands the concept of identification to consider cases of partial learning. A more general definition of identifiability is $p(y \mid \tau) = p(y \mid \tau')$ if and only if $t(\tau) = t(\tau')$ for some non-constant function t; here t is an "identifying function" in the terminology of Kadane (1975). When t is one-to-one, we recover the traditional definition of identifiability, or *point identification*. When the t with the finest preimage satisfying this condition is many-to-one, the model is partially identified — the intuition being that asymptotically we can only isolate the value of $t(\tau)$ consistent with the data, which will correspond to a proper subset of T with more than one element. For this reason, and in contrast to point identification, it is common to talk of *set* or *partial identification*. For a more rigorous exposition of the theory of functional identification, refer to Kadane (1975).

Early examples of the partial identification concept include Frisch (1934), Fréchet (1951) and Duncan and Davis (1953). In recent years, interest in partial identification has accelerated; an excellent recent review article is Tamer (2010) which includes comprehensive citations. See also the book-length treatments by Manski (Manski, 1995, 2003, 2007). Recent contributions from a Bayesian perspective have focused primarily on asymptotic properties of the posterior distribution over partially identified parameters, notably Gustafson (2005) and Gustafson (2010). Moon and Schorfheide (2012) examine asymptotic discrepancies between Bayesian credible regions and frequentist confidence sets for set-identified parameters. Florens and Simoni (2011) consider a

theoretical framework for studying posteriors of partially identified parameters in nonparametric models. Kline and Tamer (2013) develop large sample approximations of posterior probabilities that particular parameter values lie in the identified set without reference to a prior on the partially identified parameter. See also the recent book by Gustafson (2015).

Our approach differs from these recent contributions in three ways. One, it is tailored to a non-linear regression setting with possibly many predictors and complicated inter-relationships; most of the recent literature considers much simpler examples, often without any covariates. Two, our focus is on practical methods for making inferences on parameters of interest with finite samples; most of the recent literature has focused on theoretical and specifically large-sample issues. Three, we introduce an efficient computational scheme for sensitivity analysis, an issue which has received relatively little attention in the literature. Most previous work focuses on wholly unidentified parameters and typically requires multiple iterations of model fitting; see e.g. Mc-Candless et al. (2007); Molitor et al. (2009) and McCandless et al. (2012) in the context of causal inference/observational data analysis, and Daniels and Hogan (2008) and chapter 15 of Little and Rubin (2002) for extensive reviews in missing data problems.

1.2 Application: inferring the prevalence of accounting misconduct

Since 1982, the United States Securities and Exchange Commission (SEC) has released public notices called Accounting and Auditing Enforcement Releases, or AAERs. AAERs are financial reports "related to enforcement actions concerning civil lawsuits brought by the Commission in federal court and notices and orders concerning the institution and/or settlement of administrative proceedings" (Securities and Exchange Commission, Accounting and Auditing Enforcement Releases, 2014). Informally, AAERs comprise a list of publicly traded firms that the SEC has cited for misconduct in one form or another.

For brevity, we adopt the nomenclature "cheating" and "caught", with the understanding that "cheating" is operationally defined as any accounting anomaly that would lead to an AAER being issued, were it explicitly brought to the SEC's attention. This interpretation entails that all caught firms are, by definition, "cheaters".

Our goal is to provide an estimate of the prevalence of accounting misconduct in the U.S. econ-

omy, defined as all actual (caught) and potential (uncaught) AAERs. Predicting which companies are likely to cheat, on the basis of observable firm characteristics, is complicated by the fact that there are potentially many instances of misconduct of which the SEC is unaware. Thus, we do not directly observe which firms cheat, but merely the subset of cheating firms that were *caught* doing so. A naive regression analysis would therefore only speak to the question of which attributes are predictive of getting caught cheating. To complete the analysis, one must incorporate knowledge or conjectures concerning the impact firm attributes have on the likelihood of misconduct being discovered.

Problems with a similar structure to the SEC data appear in the literature under the heading of "partially observed binary data". Regression models for such data have been studied in many different fields, going by various names. For example, Lancaster and Imbens (1996) considers the case where the observation model is covariate independent under the name "contaminated case-control", building on Prentice and Pyke (1979). Poirier (1980) studies such data under the rubric of "partially observed bivariate probit models", building on the work of Heckman (1976, 1978, 1979). Our analysis is similar to the approach taken in Wang (2013), which adapts the bivariate probit model of Poirier (1980) for the securities fraud problem.

Whereas these earlier references considered particular parametric models, such as the probit model, and studied identification conditions in that setting, we proceed in the more generic setting of nonlinear regression models, which leads to partially identified parameters. Our approach will be to confront this partial identification with informative priors.

2 Prior specification for partially identified regression models

As in Dawid (1979); Gelfand and Sahu (1999) and Gustafson (2005), we will work with a reparameterization of τ into an identified component ϕ and an unidentified component (θ , η). We separate the unidentified component into θ , which appears in our estimand of interest, and η , which collects hyper parameters. We will be interested in the case where ϕ and θ are functions of a fixed vector of covariates x. Therefore, we will refer to ϕ , ϕ (x) or ϕ _X (respectively, θ , θ (x) or θ _X) depending on context. We will use ϕ when the dependence on x is inessential, we will use ϕ (x) to emphasize that

 ϕ is a function of x, and we will use ϕ_X to refer to point-wise evaluations of $\phi(x)$. One may allow η to be a function of x as well, but we do not explore this possibility here.

The joint distribution over data and parameters in a partially identified model can be written as

$$\pi(\eta, \theta, \phi, y) = f(y \mid \eta, \theta, \phi)\pi(\eta, \theta, \phi),$$

$$= f(y \mid \phi)\pi(\eta, \theta, \phi),$$

$$= f(y \mid \phi)\pi(\phi)\pi(\eta, \theta \mid \phi),$$

where the conditional independence implied in moving from the first line to the second line constitutes a definition of partial identification. It follows that the joint posterior distribution of the identified component ϕ and the unidentified component (θ, η) can be written as

$$\pi(\eta, \theta, \phi \mid y) = \frac{f(y \mid \phi)\pi(\phi)\pi(\eta, \theta \mid \phi)}{f(y)} = \frac{f(y \mid \phi)\pi(\phi)}{f(y)}\pi(\eta, \theta \mid \phi) = \pi(\phi \mid y)\pi(\eta, \theta \mid \phi). \tag{1}$$

Theorem 5 of Kadane (1975) shows rigorously that the parameter space of any model can be decomposed in this way. Essentially, there are three cases to consider. If the model is fully identified, then (η, θ) is simply a constant random variable. When the model has fully unidentified elements, the support of $\pi(\eta, \theta \mid \phi)$ does not depend on ϕ ; the data inform about (η, θ) only via the presumed prior dependence represented in the choice of $\pi(\eta, \theta \mid \phi)$. In the partially identified case, which we focus on here, $\pi(\theta \mid \phi, \eta)$ has support restrictions that do depend on ϕ ; we will denote this restricted support by $\Omega(\phi, \eta)$.

Our approach will be to directly specify $\pi(\theta \mid \phi, \eta)$ with support $\Omega(\phi, \eta)$. In principle, η can be integrated out a priori, but η often proves useful as a device for parameterizing the conditional prior for θ , in conjunction with a possibly ϕ -dependent prior $\pi(\eta \mid \phi)$. Our SEC analysis specifies $\pi(\eta \mid \phi)$ with non-trivial support restrictions depending on ϕ , while in the flu analysis in the supplement we take $\pi(\eta \mid \phi) = \pi(\eta)$. Algorithmic details are given in section A.1. See Gustafson (2005, 2010) and Florens and Simoni (2011) for similar decompositions.

More specifically, partial identification arises in our applied analysis due to partially observed multivariate binary data. The complete data consist of binary vectors $U = (U_1, ..., U_k)$, of which only certain subsets are simultaneously observable. Interest is in some functional p(x) of the entire joint distribution $p(U_1, ..., U_k \mid x)$, where x denotes a vector of fixed covariates. Due to the partial observability, p(x) must be reconstructed from an identified function $\phi(x)$ and an unidentified

function $\theta(x)$.

2.1 A Gaussian process model for the partially identified regression

Furnishing prior information regarding $\theta(x)$ in a predictor-dependent manner strongly motivates the use of simple parametric models. For starters, consider the construction

$$F^{-1}\{\theta(\mathbf{x})\} = h(\mathbf{x})\beta,\tag{2}$$

where F^{-1} is a link function and h denotes some transformation or subset of the covariate vector. In this case $\eta \equiv \beta$, and a prior over $\theta(x)$ is induced by the prior $\pi(\beta \mid \phi)$. A chief difficulty with this type of specification is that nonlinear (possibly discontinuous) regression models for $\phi(x)$ impose complex support restrictions on $\pi(\beta \mid \phi)$ — indeed, some samples from the posterior for $\phi(x)$ may contradict the model for $\theta(x)$ entirely, meaning that they imply a set of bounds for $\theta(x)$ such that no feasible β exists.

To address this problem, we expand the prior over $\theta(x)$ to acknowledge that (2) is only a guess as to the form of the regression function. Specifically, we *center* our model for $\theta(x)$ at (2) by assuming that

$$F^{-1}\{\theta(\mathbf{x})\} \mid \phi(\mathbf{x}), \eta \sim \mathcal{GP}(h(\mathbf{x})\beta, \Sigma_{\chi}) \, \mathbb{1}[\theta(\mathbf{x}) \in \Omega\{\phi(\mathbf{x}), \eta\}]$$
(3)

for all $x \in X$. Here $\mathcal{GP}(m, \Sigma_X)$ denotes a Gaussian process kernel with mean m and covariance Σ_X and the indicator function denotes that our prior is truncated to be supported on $\Omega\{\phi(x), \eta\}$.

Additionally, we will assume that (3) is supported on the discrete set of observed data points, i.e. $X = \{x_i\}_{i=1}^n$, (though additional design points of interest could be included as well). The assumption of a discrete support yields computations involving a truncated multivariate normal prior, conditional on β . Note that in this specification, β may be given a proper prior distribution, which may depend on $\phi(x)$, or may be fixed at predetermined values. In our empirical analysis, we assume diagonal covariance functions, which we denote as $\Sigma_X = \sigma^2 I$. Under this specification, sampling from $(\theta_X \mid \eta, \phi_X)$ reduces to drawing samples from independent truncated univariate normal distributions.

Note that choosing a multivariate normal prior over β , with covariance Σ_{β} , implies a Gaussian process prior on θ (marginalizing over β) with non-diagonal covariance $h(x)^T \Sigma_{\beta} h(x) + \sigma^2 I$.

This representation can be exploited to approximate Gaussian process priors with general covariance functions, without requiring onerous draws from multivariate truncated normal distributions (Pakman and Paninski, 2014). However, we do not explore this possibility further here.

2.2 Illustration

It is instructive to observe graphically how the approach works in a simple problem where the predictor variable x is one-dimensional. Therefore, consider the following definitions of $\phi(x)$ and $\theta(x)$ for $x \in [0, 1]$:

$$\phi(x) = 0.05 + 0.7 \text{ logistic}(14(x - 0.5)),$$

$$\theta(x) = 0.1 + 0.7 \text{ logistic}(16(x - 0.5) + 50(x - 0.5)^2)$$

These formulae are included for replicability, but the set-up is easiest to see graphically as illustrated in Figure 1a. The important features are that $\phi(x)$ and $\theta(x)$ both lie between 0 and 1 and $\phi(x) \leq \theta(x)$ for all values of $x \in [0,1]$. Suppose that $i=1,\ldots,n=100$ data pairs (x_i,y_i) are observed, with $\Pr(Y_i=1\mid X_i=x)=\phi(x)$, and suppose that interest is in the ratio $p(x)\equiv\frac{\phi(x)}{\theta(x)}$. Clearly p(x) is unidentified through its dependence on θ alone. Nonetheless, the data do inform us about possible values of $\theta(x)$, and hence p(x), due to the constraint that $\phi(x)\leq\theta(x)$. That is, in this example $\Omega\{\phi(x),\eta\}=\{\theta(x)\mid \phi(x)\leq\theta(x)\leq 1\ \forall x\in\mathcal{X}\}$ (no hyperparameter η has been designated yet).

We specify a prior on $\theta(x)$ as

$$\Phi^{-1}(\theta(x)) \sim \mathcal{GP}\left(\beta_0 + \beta_1 x + \beta_2 x^2, \sigma^2 \mathbf{I}\right) \mathbb{1}\left[\theta(x) \in \Omega\{\phi(x), \eta\}\right]$$

where $\Phi(\cdot)$ is the standard normal inverse cumulative distribution function. We fix $\beta_0 = 1$, $\beta_1 = -9$, $\beta_2 = 9$, to mimic the elicitation of a "U-shaped" regression function. In the notation of section 2, we have $h(x) = (1, x, x^2)$ and $\beta = (1, -9, 9)^T$.

As seen in Figure 1a, this prior guess is grossly incorrect. However, in regions where the data are uninformative via the bounds supplied by $\phi(x)$, the prior happens to be close to the truth. Therefore, this prior, coupled with the observed data, yields a reasonably accurate estimate of $\theta(x)$ and of p(x) (Fig. 2a, left) in the sense that the posterior 95% credible interval of $\alpha = n^{-1} \sum_i \phi(x_i)/\theta(x_i)$

contains the true value (Fig. 2a, right). The raw estimate from the data, i.e., assuming $\theta(x) = 1$ for all x, would have given the much smaller estimate of approximately 1/2. Of course, this is an ideal scenario — the prior for θ is correct where the data are uninformative, and the data are fairly informative — through $\Omega\{\phi(x),\eta\}$ — where the prior for θ is incorrect. In general we will have no such assurances, so it is important that the modular prior is carefully chosen and that the sensitivity of posterior inference to multiple specifications of the modular prior is assessed. In appendix B we consider other, less fortuitous choices of prior distributions.

It is possible to further improve our estimate by supplying additional prior information. Assume that we believe $\phi(x)/\theta(x) < c$ for all x, which implies that $\phi(x)/c \le \theta(x)$. Taking c < 1 defines a *larger* lower bound on $\theta(x)$ than the necessary one, which implicitly takes c = 1. To connect this specification with the more abstract formulation of section 2, we have $\eta \equiv c$ and $\Omega\{\phi(x), \eta\} = \{\theta(x) \mid \phi(x)/c \le \theta(x) \le 1\}$.

Note that the relationship between ϕ , θ and c also implies that $c \ge \sup_X \phi(x)$. Hence the data are partially informative about c as well, and may contradict any particular fixed value. So rather than fixing c to some value c_0 we assign it a proper prior, concentrated around c_0 and truncated to the appropriate region, with a scale parameter controlling the degree of prior belief in c_0 . For this example we assign c a Beta(vc_0 , $v(1-c_0)$) distribution, truncated to have support $c \ge \sup_X \phi(x)$. Here we take $c_0 = 0.65$ and v = 100, considering other specifications in appendix B.

The results under this more informative prior are shown in Figures 1b and 2b. Because the true parameter values satisfy $\phi(x_i)/\theta(x_i) < 0.8$ across all i, the chosen prior on c induces a prior on $\theta(x)$ which proves beneficial. Different choices of m(x) and prior over c yield different posterior estimates; Appendix B explores additional specifications.

3 Analysis of AAER data, 2004-2010

Let Z_i indicate "cheating" in firm-year i, let W_i indicate "getting caught" in firm-year i, ($U_1 = W$ and $U_2 = Z$) and let x denote a vector of firm attributes (some which vary by year, such as income, and others that are constant across years, such as industry). We assume that with some probability, cheaters get caught, but that there are no firms who get caught when they are not cheating (this

is consistent with our operational definition of "cheating"). Additionally, the data are "presence-only" in that we have no confirmation that any given firm is certainly non-cheating.

The parameter of interest is the marginal firm-year probability of cheating,

$$p(x) = Pr(Z = 1 \mid x) = \frac{Pr(W = 1, Z = 1 \mid x)}{Pr(W = 1 \mid Z = 1, x)}$$

from which we may determine the overall prevalence of cheating across all firms as

$$\alpha \equiv n^{-1} \sum_{i=1}^{n} \Pr(Z_i = 1 \mid X_i) = n^{-1} \sum_{i} \frac{\Pr(Z_i = 1, W_i = 1 \mid X_i)}{\Pr(W_i = 1 \mid Z_i = 1, X_i)}.$$
 (4)

Equivalently, for each firm-year we observe $Y_i \equiv Z_i W_i$ instead of (Z_i, W_i) , where Y_i indicating whether a firm received an AAER (cheated and got caught), giving

$$\phi(x) = \Pr(Z = 1, W = 1 \mid x) = \Pr(Y = 1 \mid x); \quad \theta(x) = \Pr(W = 1 \mid Z = 1, x).$$

As $\phi(x)$ is simply the (conditional) probability of the observed binary data Y, it is point identified. In our application, we estimate $\phi(x)$ using the BART model described in the Appendix. BART has been shown empirically to be an excellent default nonlinear regression method, with a demonstrated ability to handle many noise variables and strong nonlinearities (Chipman et al., 2010; Hill, 2012).

The partial identification of p(x) arises simply because $0 \le p(x) \le 1$. Given $\phi(x)$, the posterior on p(x) is defined by the prior over $\theta(x)$, truncated to regions satisfying

$$0 \le \frac{\phi(\mathbf{x})}{\theta(\mathbf{x})} \le 1,\tag{5}$$

for all $x \in \mathcal{X}$. In other words, in our applied setting, $\Omega\{\phi(x), \eta\} = \{\theta(x) \mid \phi(x) \leq \theta(x), \ \forall x \in \mathcal{X}\}$, just as in our example from section 2.2.

3.1 Data

Our data are aggregated from three main sources. First, the AAER response variable was obtained from the Center for Financial Reporting and Management (CFRM) at Berkeley's Haas School of Business. Detailed information about the full data set can be found in Dechow et al. (2011).

Second, additional firm attributes are obtained from the CompuStat North America Annual Fundamentals database via the Wharton Research Data Service (WRDS). These data are then merged with the AAERs using Global Company Key (GVKEY) by year. Specifically, the covariate vector x consists of:

- fiscal year,
- cash,
- net income,
- capital investments,
- SIC industry code,
- qui tam dummy variable.

Cash, net income and capital investments are all recorded as a fraction of the firm's total assets. Standard industrial classifications are given in terms of ten major divisions, denoted A-J by the Occupational Safety and Health Administration. The *qui tam* dummy variable is derived from the SIC codes; it denotes if a firm is in an industry where persons responsible for revealing misconduct are eligible to receive some part of any award resulting from subsequent prosecution. Similar to Dyck et al. (2008) and Jayaraman and Milbourn (2010), our qui tam variable is set to one for firms with SIC code 381x, 283x, 37xx, 5122 or 80xx, which includes healthcare providers and pharmaceutical firms, and airplane, missile, and tank manufacturers. It is reasonable to suppose that firms in these industries have a greater likelihood of any misconduct being exposed as a result of incentivized employees.

Finally, a keyword search at the Financial Times web page (www.ft.com) was conducted on each company name and the number of search results was recorded by year. This variable provides a crude measure of media exposure. Although discrepancies between firm names as recorded in CompuStat and firm names as reported in Financial Times articles lead to measurement error of this variable, it still provides a reasonable proxy for name recognition and cultural visibility. Most firms will never be mentioned in any news article; a few firms are routinely mentioned in the press. To adjust for the fact that web traffic has increased over that period, we normalize the search results count by the total number of hits across all companies in a given year.

We restrict our analysis to U.S. firms that had positive net income for the given year, considering the period between 2004 and 2010, for a total of 6,641 unique firms and a total of n = 25,889 total firm-year observations.

3.2 Surveillance model

The unidentified function $\theta(x)$ can be thought of as a "surveillance" probability; it encodes which attributes invite (discourage) SEC scrutiny, making cheaters more (less) likely to be caught. Its effect is to inflate the probability of cheating, which is intuitive since the proportion of caught cheaters $\phi(x)$ represents an obvious lower bound on the proportion of actual cheaters.

Our surveillance model takes the form reported in expression (3) with $\Sigma_X = \sigma^2 I$ and using a logit link. We scale and shift all variables to reside on the unit interval, taking shifted log transformations of the financial times search hits and net income. We chose to place nonzero coefficients on the (fiscal) year of misconduct, media exposure (as measured by Financial Times search hits), income, cash, and a dummy for qui tam industries. We have specific reasons to expect that these variables are important determinants of the surveillance probability, allowing us to chose informative values for β .

First, note that the frequency of AAERs is substantially higher in earlier years; see Figure 3. AAERs may be filed retroactively, so the opportunity to discover and report misconduct in a given year increases over time. Fitting a curve to the data in Figure 3 suggests a coefficient of roughly $\beta_{fyear} = -2.5$. Observe that this makes the posterior probability of cheating approximately constant across the years examined, which seems plausible.

Second, it is reasonable to assume that media attention naturally draws SEC scrutiny (Miller, 2006). The SEC has a vested interest in catching and making examples of any high-profile cheaters. We set $\beta_{FThits} = 2$, implying approximately a six-fold difference in the probability of misconduct being discovered between a company with no media exposure and the company with the highest media exposure. Similarly, we set $\beta_{quitam} = 1$, implying approximately a two-fold increase in misconduct being discovered for companies in qui tam industries where employees are incentivized to report misconduct. These observations constitute the subjective information contained in our first observation model A.

To determine the intercept term, consider the following argument: AAERs are quite rare, with an observed aggregate incidence in our sample of only 0.5%. Potentially this is because very few firms exhibit actionable misconduct, but more likely it is because the SEC has limited resources to identify and pursue violations. Accordingly, one sensible calibration method would be fix the mean probability of discovery across all firms. Fixing this quantity and the other elements of β , we may then solve for the intercept β_0 . In the case of model A, fixing the average discovery rate to 30% gives $\beta_0 = 0$.

After obtaining posterior samples under model A, we observe that cash appears to have a negative impact on the probability of cheating. In contrast, net income appears to have a positive impact on the probability of cheating. We might surmise that these trends are due to unadjusted surveillance probabilities. For example, one could argue that having large amounts of cash on hand (relative to total assets) provides a measure of "wiggle room" that makes certain kinds of misconduct harder to discover. Likewise, firms with high income are more likely to draw SEC attention than firms with smaller income streams. To compare our results under these narratives, we specify a second surveillance model (B), with $\beta_{cash} = -1.5$ and $\beta_{income} = 2.5$. Setting the intercept for model B to match the 30% discovery rate of model A gives $\beta_0 = -0.85$. Surveillance models A and B are shown side-by-side in Table 1.

3.2.1 Upper bounding firm-year cheating probability

Finally, we introduce an additional parameter c that allows us to interject prior information concerning an upper bound on the probability of cheating, as was done in the example of section 2.2. Recall that the partial identification in this application is driven by the inequality $\Pr(Z = 1 \mid x) = \phi(x)/\theta(x) \le 1$, which implies $\phi(x) \le \theta(x)$; the left hand side of this latter inequality is identified by the data. Extremely high probabilities of cheating are implausible, motivating us to consider alternative truncations: $\Pr(Z = 1 \mid x) = \phi(x)/\theta(x) \le c$, which implies $\phi(x)/c \le \theta(x)$ and $c \ge \phi(x)$ for all x. In terms of the notation in section 2, we have $\eta \equiv c$ and $\Omega\{\phi(x),\eta\} = \{\theta(x) \mid \phi(x)/c \le \theta(x) \le 1 \ \forall x \in X\}$. As in our example in section 2.2, $\phi(x)$ is identified so the data may contradict any particular value of c.

We specify $\pi(c \mid \phi(x)) \propto \text{Beta}(10c_0, 10(1-c_0)) \mathbb{1}\{c \geq \sup_X \phi(x)\}\$ so that c_0 captures prior

beliefs about the upper bound on $\Pr(Z = 1 \mid x)$, the probability of cheating for any firm. Our prior for $(\theta_X \mid c, \phi_X)$ again takes the form in expression (3), with various fixed specifications of β and h(x) as described above, and $\Omega\{\phi(x), \eta\} = \{\theta(x) \mid \phi(x)/c \le \theta(x) \le 1 \ \forall x \in X\}$. The covariance is taken as $\sigma^2 I$, with both σ^2 and c_0 subject to a range of specifications for sensitivity analysis in the following subsection.

Our surveillance models allow us to include prior information in the form of subject matter knowledge about the impact of various covariates. We are also able to include additional subjective prior information about $\alpha \equiv n^{-1} \sum_i \Pr(W_i = 1 \mid Z_i = 1, \mathbf{x}_i)$ — the overall prevalence, i.e., average probability, of a cheating firm getting caught — via the intercept terms, and $\max_i \Pr(Z_i = 1 \mid \mathbf{x}_i)$ — an upper probability on any firm cheating — via the prior on c. Computational details are included in the Appendix.

3.3 Results

We conduct a sensitivity analysis by varying the parameters σ and c_0 for both model coefficients β_A and β_B above. Specifically, we consider two settings of each ($\sigma \in \{0.25, 0.5\}$ and $c_0 \in \{0.4, 0.8\}$) for a total of eight candidate models. We study the impact these choices have on both $Pr(Z = 1 \mid x)$ as a function of individual predictor variables, and also on the overall misconduct prevalence α .

Figure 4 shows the posterior distribution of the adjusted cheating prevalence under the different models. As can be seen in the top panel, increasing σ or c_0 alone has little effect on the overall adjusted cheating prevalence. These two parameters control different aspects of the surveillance uncertainty: a high c_0 implies that any probability of cheating is plausible, whereas a high σ allows large deviations from the specified surveillance model logistic term. Under these values of c_0 and σ , we observe that the prevalence of misconduct is inferred to be less than 15% with high probability.

The bottom panel of Figure 4 shows the posterior prevalence for each different SIC code under the two priors, fixing ($\sigma = 0.25$, $c_0 = 0.4$). Under both priors, SIC category D, representing "electricity, gas, steam and air conditioning supply", shows much lower cheating prevalence than categories (B,E,H), which correspond to "mining and quarrying", "water supply, sewerage, waste management and remediation activities", and "transportation and storage" respectively. This find-

ing squares with prior expectation that misconduct prevalence should vary by industry.

Because BART is nonlinear, summary plots of the impact of individual covariates are challenging to visualize, even if the surveillance model is relatively simple, such as our linear logistic specification. It is instructive, therefore, to examine the implied probability of cheating as one varies individual covariates, for a given firm. That is, how does $Pr(Z = 1 \mid x)$ change as a function of x_i while holding x_{-i} fixed?

To demonstrate this approach, we focus on a specific firm, ConAgra Foods of Omaha, Nebraska (simply because it yields illustrative plots). Figure 5 shows $Pr(Z = 1 \mid x)$, varying media attention, cash, and net income under priors A and B and for various combinations of c_0 and σ . As expected, the surveillance model coefficients on cash and net income reverse the associated slope of the probability of cheating. High values of both σ and c_0 results in posterior credible intervals of up to 40% probability of cheating for some values of net income.

We have reported here only a small number of the possible variations one would presumably want to investigate; we make no claims that models A and B are ideal or even necessarily good or realistic models. Rather, our sensitivity analysis demonstrates a range of possible comparisons that one might undertake when investigating how various assumptions interact with the data via the identified portion of the model.

An important upshot of our analysis is that the surveillance model intercept terms—which govern the average probability of misconduct discovery (getting caught) across firm—and the parameter c— which defines the upper bound $Pr(Z_i = 1 \mid x_i) \le c$ for all i— play dominant roles in determining the inferred overall prevalence of misconduct. For our choices of 30% misconduct discovery probability and $c_0 = 0.4$ or 0.8, we find that no more than 15% of firms engage in accounting misconduct.

This finding is consistent with that of Dyck et al. (2013), who put the prevalence at between 4.74% to 15%, based on a clever natural experiment resulting from the dissolution of the large accounting firm Arthur Andersen and the subsequent re-audit of its clients following the Enron scandal. Unavailability of their exact data, as well as the unavailability of the data of Wang (2013) at the time of writing, means that we cannot compare their precise estimates with those from our model. However, our partial identification analysis suggests that any similar analysis is likely to

yield similar conclusions in the matter of overall prevalence. After all, there is only so much information in the available data, with the rest coming from auxiliary assumptions about the surveillance probability, whether those assumptions are explicit, as in our model, implicit, as in the joint likelihood assumed by Wang (2013), or based on supplementary evidence, as in Dyck et al. (2013). To the extent that these various approaches supply similar assumptions, they will yield similar conclusions. Our approach, by layering such assumptions over the data *ex post*, permits systematic sensitivity analysis rather than one-off comparisons of published studies whose authors are committed to one particular approach.

4 Discussion

We conclude by comparing our modular prior approach to that of Wang (2013), which similarly attempts to infer the prevalence of fraud using the SEC data, on a simulated data set. This comparison serves to further highlight the advantages of our approach relative to parametric alternatives in problems exhibiting partial identification. We consider the performance of our approach relative to a correctly specified parametric model and also to a misspecified parametric model.

Wang (2013) builds off Poirier (1980), which considers a latent Gaussian utility formulation of the bivariate probit model:

$$\begin{pmatrix} Z^* \\ W^* \end{pmatrix} \sim \mathcal{N}(\mu(\mathbf{x}), \mathcal{C}_{\rho})$$
 (6)

where $\mu(x) = (\gamma_0 + x^T \gamma, \delta_0 + x^T \delta)$ and C_ρ is a 2-by-2 correlation matrix with correlation parameter ρ . The latent utilities (Z^*, W^*) give rise to bivariate variables $Z \equiv \mathbb{1}(Z^* > 0)$ and $W \equiv \mathbb{1}(W^* > 0)$. Poirier (1980) establishes that (subject to certain exclusion restrictions) the parameters of the model (γ, δ) and the correlation parameter ρ are identified even if only $Y \equiv ZW$ is observed. Wang (2013) proposes to leverage this result, while deviating from the latent utility formulation. In particular, despite making a "no false positives" assumption (as we did in our analysis), Wang (2013) continues to equate $\Pr(Z^* > 0 \mid x)$ with the probability of cheating which corresponds to the somewhat arbitrary model:

(7)

In other words, Wang (2013) identifies γ from the first equation above, invoking the result of Poirier (1980), and then proceeds to interpret γ as the parameter from a bivariate probit model *without* the no false positives assumption. While there is nothing formally wrong with this model, its peculiar form appears not well motivated.

All the same, if (7) is in fact the correct model, it is instructive to observe what our approach gives up to it. Conversely, if (7) is used in a misspecified setting, how do its results compare to ours? To investigate, we simulated n=2000 observations from the following two models. First, we generated data according to (7) by drawing $Y \equiv WZ$ with (W, Z) coming from a bivariate probit model with $\gamma_0 = \delta_0 = -1/2$, $\gamma = (-1, 3/4, 0)$, $\delta = (-3/4, 0, -1/2)$, and $\rho = 1/2$, with x_1 drawn from a Uniform $(-\pi/2, \pi/2)$ distribution, and x_2 and x_3 drawn from a Uniform $(-3\pi/2, 3\pi/2)$ distribution (independently). This specification of γ and β satisfies the exclusion restriction of Poirier (1980), in that distinct predictor variables are omitted from each linear equation in the probit mean function.

A Bayesian specification of Wang (2013), with vague conjugate priors for β and γ and a uniform prior on (-1,1) for ρ , was fit using a Gibbs sampler algorithm with a Metropolis-Hastings update for ρ . Our modular prior approach proceeds by fitting the BART model (with default priors as described in Chipman et al. (2010)) to the observed data (Y_i, x_i) and constructing the posterior estimate of $\Pr(Z_i \mid x_i)$ by dividing posterior samples of ϕ_X by draws of θ_X from (3), with diagonal covariance $\sigma^2 I$ with $\sigma = 0.1$ and mean function set to match the true $\Pr(W = 1 \mid Z = 1)$ implied by (7), i.e. $m(x) = \Phi(\gamma_0 + x^T \gamma, \delta_0 + x^T \delta, \rho) / \Phi(\gamma_0 + x^T \gamma)$. Note that in this case we deviate from our previous linear specification, $m(x) = h(x)\beta$, because we wish to center our prior at the corresponding probability function from Wang (2013). As in our applied analysis, we have $\Omega\{\phi(x), \eta\} = \{\theta(x) \mid \phi(x) \leq \theta(x), \forall x \in X\}$.

The results are depicted in Figure 6a. As expected, the Wang (2013) model, which achieves point-identification when it is correctly specified, yields much more accurate inference compared to our approach. Meanwhile, even with a correct surveillance model in this case, there persists a modicum of unresolved uncertainty, which reflects that in our model the estimand is only partially identified. Additionally, we see the impact of the BART prior pulling the estimated probabilities towards 1/2 in regions near the edges where there are fewer data points.

To demonstrate how inferences are impacted when the linear probit model is misspecified, we choose $\mu(x) = (0.5 + \sin(x + \pi)^T \gamma, \sin(x)^T \delta)$ for the above values of γ and δ . The Wang (2013) model is fit using the unadjusted linear predictors. The modular prior approach is fit the same as above, but centering (using 3) at the correctly specified surveillance model: $m(x) = \Phi(0.5 + \sin(x + \pi)^T \gamma, \sin(x)^T \delta, \rho) / \Phi(0.5 + \sin(x + \pi)^T \gamma)$.

These results are depicted in Figure 6a. As might be expected, under misspecification the Wang (2013) model badly mis-estimates the true $Pr(Z_i = 1 \mid x_i)$. Our approach, with good prior information, still does not achieve point identification, but manages to avoid the gross mis-fit of the Wang (2013) model by successfully recovering the nonlinear identified component from the data.

Naturally, if we had supplied invalid surveillance models, our approach may have been far off the mark in both cases. The point of this demonstration is merely that proceeding in a partially identified fashion is a more conservative course of action than choosing an implausible model on the grounds that — *should it happen to be correct* — it would deliver the desired point identification.

4.1 Summary

Working directly with modular priors in partially identified settings has several advantages. First, it allows identified parameters to be modeled flexibly, permitting the data to be maximally informative, while simultaneously allowing the analyst to specify informative priors for the underidentified components of the model. It may appear that this tactic stands in contrast to the approach of Gustafson (2010) (for example) which advocates working with a scientific model directly in the τ parametrization. However, nothing in our approach precludes the use of such subject-specific information. Rather, we argue that typical prior specifications for τ do not allow separately modulating the prior informativeness on the identified and unidentified components; by working directly in the (ϕ, θ) representation, we achieve precisely this sort differential informativeness. Nonetheless, one should always be mindful of the implied prior on τ . Specifically, analysts can use intuitions regarding τ as a tool for vetting priors over (ϕ, θ) , by checking (via simulation) that they are consistent with available knowledge in the τ representation. In many applications, such as the one studied in this paper, the (ϕ, θ) representation is itself readily interpretable (in this case, the "cheat-

ing probability" and the "surveillance probability", respectively).

Second, when an interpretable parameterization of the modular parameters is available (as it is in our application), the modular prior approach facilitates efficient sensitivity analyses. Sensitivity analysis is good practice generally, and vital when the data are completely uninformative about certain aspects of the model. Being able to conduct such analyses without refitting the entire model can be a tremendous practical advantage, particularly when fitting sophisticated nonlinear regression models to the identified component.

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A Bayesian additive regression trees

Note: In this appendix, the original notation of Chipman et al. (2010) is used; several of the BART prior parameter names are used in the main text where they refer to different entities.

In our application, the nonlinear function $\phi(x)$ was modeled using the Bayesian Additive Regression Trees (BART) approach of Chipman et al. (2010). Though nothing in our method is specific to this choice, the BART model has several properties that make it a sensible one. BART is more flexible than classical parametric regression models, such as linear logistic or probit regression (Cox, 1958), but, unlike alternative nonparametric Bayesian regression models, BART is able to detect interactions and discontinuities and is invariant to monotone transformations of the covariates.

The BART prior represents an unknown function f(x) as a sum of many piecewise constant binary regression trees. Each tree T_l , $1 \le l \le L$, consists of a set of internal decision nodes which define a partition of the covariate space (say $\mathcal{A}_1, \ldots, \mathcal{A}_{B(l)}$), as well as a set of terminal nodes or leaves — one corresponding to each element of the partition. Each subset of the partition \mathcal{A}_b is associated with a parameter value μ_{lb} , defining a piecewise constant function: $g_l(x) = \mu_{lb}$ if $x \in \mathcal{A}_b$. This regression tree function representation is depicted in Figure 7.

Individual regression trees are then additively combined into a single regression function: $f(x) = \sum_{l=1}^{L} g_l(x)$. The representation of f(x) through the sum of a set of regression trees is generally non-unique; in our applications, this redundancy is unproblematic.

Each of the functions g_l are constrained by their prior to be "weak learners"; that is, the prior strongly favors small trees and leaf parameters that are near zero. Each tree independently follows the prior described by Chipman et al. (1998), where the probability that a node at depth d splits (is not terminal) is given by $\alpha(1+d)^{-\beta}$, $\alpha \in (0,1)$, $\beta \in [0,\infty)$.

A variable to split on, and a cut-point to split at, are then selected uniformly at random from the available splitting rules. Large, deep trees are given extremely low prior probability by taking $\alpha = 0.95$ and $\beta = 2$ as in Chipman et al. (2010). The leaf parameters are assigned independent priors $\mu_{lb} \sim N(0, \sigma_{\mu}^2)$ where $\sigma_{\mu} = 3/(k\sqrt{L})$. The default value, k = 2, shrinks $g_l(x)$ strongly toward zero. The induced prior for f(x) is centered at zero and puts approximately 95% of the prior mass within ± 3 pointwise. Larger values of k imply increasing degrees of shrinkage.

Finally, the probability function of interest is modeled as $\Phi(f(x) + c)$, where c is an offset parameter with default value 0 and $\Phi(\cdot)$ is the standard normal cumulative distribution function. Complete details of the BART prior and its implementation are given by Chipman et al. (2010).

A.1 Computation

Posterior inferences are obtained by sampling at a fixed grid of design points x_1^*, \dots, x_J^* . To reduce notational clutter, we suppress dependence on x_j^* ; for example, θ should be read as referring to a specific $\theta(x_j^*)$.

Operationally, posterior samples are obtained according to the following recipe.

- 1. Fit the BART model to the observed pairs (Y_i, \mathbf{x}_i) , for i = 1, ..., n. Convenient R implementations facilitate this step readily, for example BayesTree or dbarts. This gives a collection of posterior samples $\phi^1, ..., \phi^k$.
- 2. For each posterior sample ϕ^k , draw (θ^k, η^k) by composition: First draw η^k from $\pi(\eta^k \mid \phi^k)$ and then draw θ^k from $\pi(\theta^k \mid \phi^k, \eta^k) \mathbb{I} \{ \theta^k \in \Omega[\phi^k, \eta^k] \}$.

See Chan and Tobias (2014) and Gustafson (2015), chapter 2, for related computational approaches. Because sampling from the posterior of ϕ operates independently from sampling the partially identified parameter θ — as shown in (1) in the main text — sensitivity analysis can be conducted without ever needing to refit the model, simply by repeating step 2 for various choices of $\pi(\eta, \theta \mid \phi)$.

In our empirical application, we use the Gaussian process prior (3) with diagonal covariance matrix, $\eta \equiv c$ is given a Beta prior as described in Section 3.2.1, and we use a standard normal probit link for F^{-1} . For these choices, step 2 above becomes:

- (i) Draw c from its truncated Beta distribution with lower truncation point given by $\max \left\{ \phi(\mathbf{x}_1^*), \dots, \phi(\mathbf{x}_J^*) \right\}$.
- (ii) Draw $F^{-1}\{\theta_X\}$ from independent truncated normal distributions at each design point, with lower bound $F^{-1}\{\phi_X/c\}$.

B Expanded example

This section reports additional simulations based on section 2.2. Specifically, we consider an alternative specification of m(x), the prior mean of $\theta(x)$, and also several alternative priors over the upper-bound parameter c, varying both the prior location and prior scale parameters.

Figure 8 shows posterior inferences when for $m(x) = -1 + 9x - 9x^2$. Using the notation of 2.1, we have $\beta = (-1, 9, -9)^T$ and $h(x) = (1, x, x^2)$. This choice of m(x) does not match the true $\theta(x)$ well, especially for x < 1/2 where the data are uninformative; posterior inference on α are correspondingly less accurate.

Figure 9 shows posterior inferences when m(x) is specified as in section 2.2, with $c_0 = 0.65$ for varying levels of prior scale $v \in \{10, 100, 1000\}$.

Figure 10 shows posterior inferences when m(x) is specified as in section 2.2, with $c_0 = 0.8$ for varying levels of prior scale $v \in \{10, 100, 1000\}$.

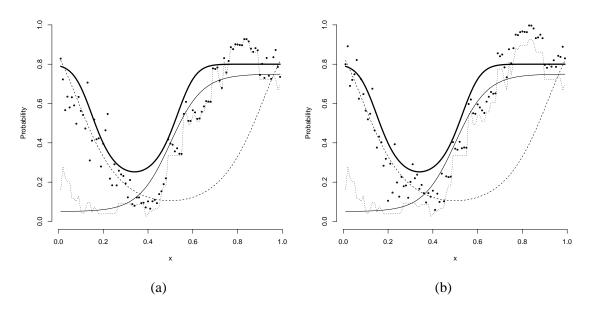


Figure 1: (a) The thin solid line indicates $\phi(x)$; the bold solid line indicates the true $\theta(x)$; the dashed line indicates the point prior mean for $\theta(x)$; the dotted line depicts a single draw from the BART posterior for $\phi(x)$. The filled circles indicate draws from the posterior on $\theta(x)$; note that they obey the lower truncation imposed by the dotted line. (b) Giving c a Beta($100c_0$, $100(1-c_0)$) prior with $c_0 = 0.65$, posterior draws of $\theta(x)$ (black dots) are observed to be further away from the lower bound $\phi(x)$ (dotted line) in regions where $\theta(x)$'s prior mean, m(x) (dashed line), is much less than $\phi(x)$. Compare to Figure 1a, where the posterior draws of $\theta(x)$ hug the lower bound tightly.

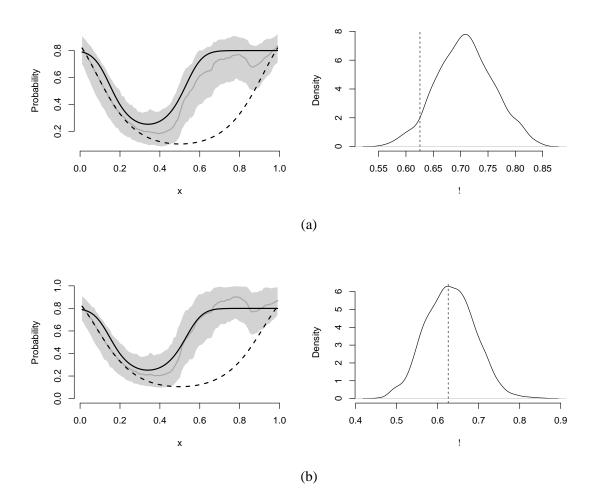


Figure 2: (a) (left) Posterior mean (solid gray) and 90% credible interval for $\theta(x)$ (shaded), along with its prior mean (dashed) and true value (solid black). Because the prior matches the truth in regions where the data is uninformative and is incorrect in regions where the data is informative, the posterior mean ends up relatively close to the truth. (Right) A posterior density (smoothed) for $\alpha \equiv n^{-1} \sum_i \phi(x_i)/\theta(x_i)$. Because the posterior for $\theta(x)$ well-approximates the truth, a decent estimate of the true value of α (shown as a dashed vertical line) is achieved. (b) Providing prior bias that $\phi(x)/\theta(x) < c_0 = 0.65$ leads to improved estimation of both $\phi(x_i)/\theta(x_i)$ (at left, solid gray is posterior mean, solid black is true, dashed is prior mean) and $\alpha \equiv n^{-1} \sum_i \phi(x_i)/\theta(x_i)$ (at right, truth is shown by the vertical dashed line).

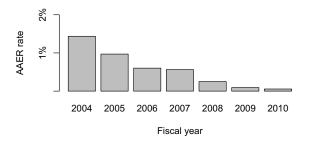


Figure 3: AAERs are more common in earlier years, likely because they may be filed retroactively, not because cheating was more prevalent in the past.

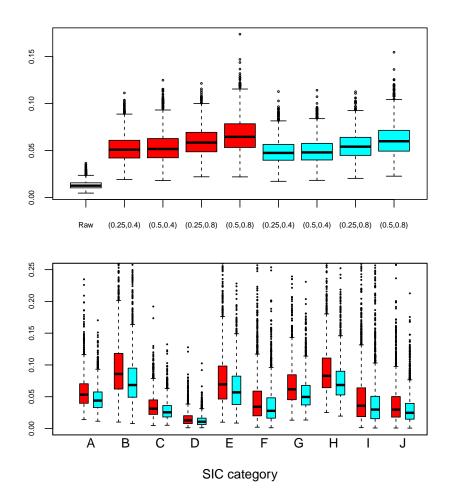


Figure 4: Top panel: posterior cheating prevalence, white corresponding to the raw (unadjusted) prevalence, pink to prior A and blue to prior B. The four boxplots within each prior correspond to the following combinations for c and σ (from left to right): ($\sigma = 0.25, c_0 = 0.4$), ($\sigma = 0.25, c_0 = 0.4$), ($\sigma = 0.5, c_0 = 0.4$), ($\sigma = 0.5, c_0 = 0.4$). Bottom panel: Posterior cheating prevalence in companies within each SIC code, pink corresponding to prior A and blue to prior B for ($\sigma = 0.25, c_0 = 0.4$).

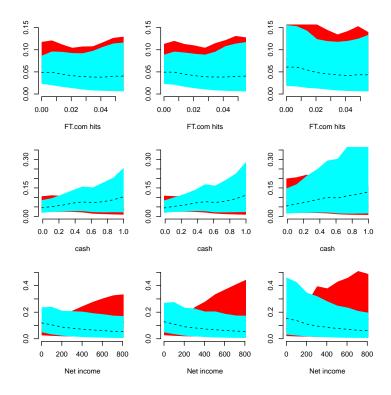


Figure 5: $\Pr(Z = 1 \mid x)$ varying x_j while holding x_{-j} fixed (at the values of ConAgra Foods) under two surveillance models A (pink, solid) and B (blue, dashed). Lines depict the median and shaded areas depict 90% credibility intervals. Each row represents a different covariate; the three columns correspond to the following (c_0, σ) combinations (from left to right): $(c_0 = 0.4, \sigma = 0.25)$, $(c_0 = 0.8, \sigma = 0.5)$.

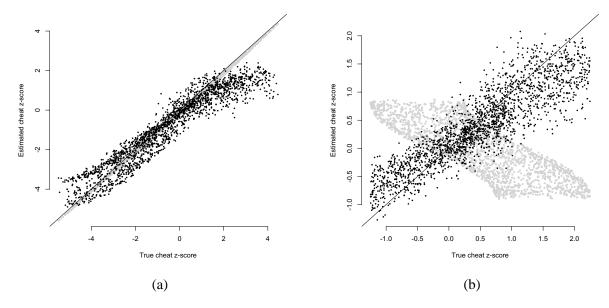


Figure 6: (a) Estimated probability of cheating versus the actual probability of cheating on the normal linear predictor scale for each of n = 2000 data points. Black solid dots show the modular prior approach, which loosely surrounds the diagonal, demonstrating the unresolved uncertainty in the partial identification approach. The solid gray dots correspond to the Wang (2013) model, which is correctly specified in this example; they hew more tightly to the diagonal. (b) Estimated probability of cheating versus the actual probability of cheat on the normal linear predictor scale for each of n = 2000 data points. Black solid dots show the modular prior approach, which loosely surrounds the diagonal, demonstrating the unresolved uncertainty in the partial identification approach. The solid gray dots correspond to the Wang (2013) model, which is incorrectly specified in this example; they grossly diverge from the diagonal.

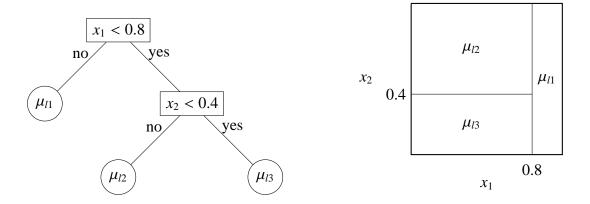


Figure 7: (Left) An example binary tree, with internal nodes labelled by their splitting rules and terminal nodes labelled with the corresponding parameters μ_{lb} . (Right) The corresponding partition of the sample space and the step function.

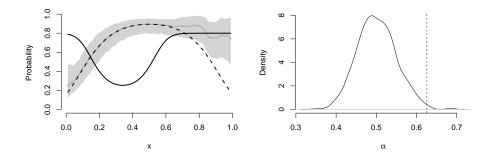


Figure 8: Here m(x), the prior mean of $\theta(x)$, is grossly incorrect for all values of x (dashed). In the previous examples, m(x) was relatively close to $\theta(x)$ when x < 1/2, which happens to be the region where the data is uninformative. Posterior inferences concerning $\alpha \equiv n^{-1} \sum_i \phi(x_i)/\theta(x_i)$ are seen to be inaccurate as a result.

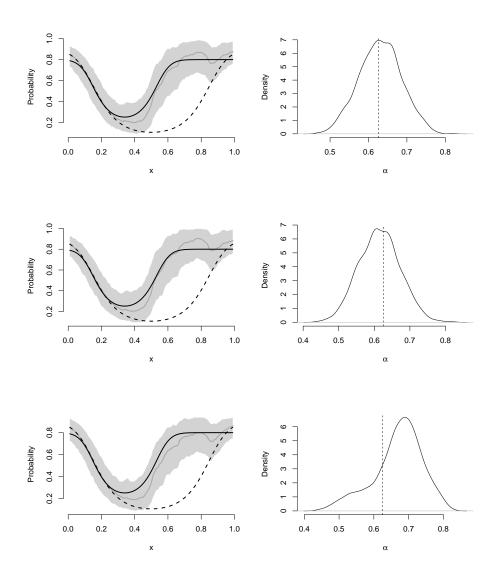


Figure 9: Results are shown with truncated beta distributions Beta(vc_0 , $v(1-c_0)$) for v=10, v=100 and v=1000, from top to bottom, with $c_0=0.65$. The true upper bound on $\phi(x_i)/\theta(x_i)$ is 0.8. As a result, decreasing the variance about c_0 can adversely bias posterior inferences; higher variance prior guard against misspecified values of c_0 .

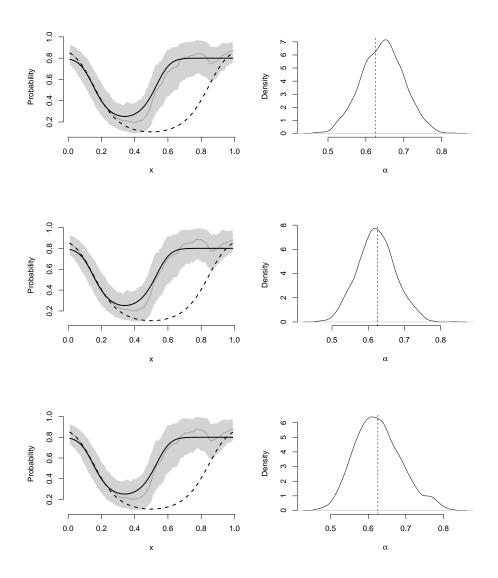


Figure 10: Results are shown with truncated beta distributions Beta(vc_0 , $v(1-c_0)$) for v=10, v=100 and v=1000, from top to bottom, with $c_0=0.8$, the true upper bound on $\phi(x_i)/\theta(x_i)$. As a result, decreasing the variance about c_0 does not adversely bias inferences.

Table 1: Regression coefficients defining surveillance models A and B. They differ in their intercept terms and their cash and net income coefficients. The intercepts have been adjusted to obtain an average misconduct discovery rate of 30%

	Intercept	Fiscal year	FT.com hits	cash	net income	qui tam
β_A	0	-2.5	2	0	0	1
β_B	-0.85	-2.5	2	-1.50	2.5	1