

# Coalitional Lobbying and Intersectional Representation in American Rulemaking

MARAAM A. DWIDAR *Syracuse University, United States*

*Interest groups representing the marginalized regularly neglect advocacy on behalf of their most vulnerable constituents—those with intersectional disadvantage. Yet, they claim that such advocacy is central to their missions. I argue that interest groups representing women, people of color, Native nations, and the poor strategically conduct intersectional advocacy through coalitional lobbying. I test this claim using a new dataset of cosignature patterns within public comments on proposed federal agency rules submitted by a set of such groups between 2004 and 2014. I find that these groups are significantly more likely to pursue intersectional advocacy in coalitions but that coalition work, alone, does not relate to influential intersectional advocacy. Rather, it is particular coalition characteristics, including organizational diversity and financial capacity, that predict such influence. I conclude that collaborative lobbying is an effective tactic for mediating representational bias in interest group advocacy and promoting more pluralistic administrative policy making.*

## INTRODUCTION

Members of historically marginalized groups in the United States face significant barriers to political and policy influence. Activities such as voting, contributing to campaigns, participating in political protests, and joining political membership organizations require individual and institutional resources (Brady, Verba, and Schlozman 1995). These resources are unevenly distributed across demographic populations, with fewer resources concentrated among historically marginalized groups and intersections thereof—including, but not limited to, women, people of color, Indigenous peoples, and the poor (Gilens 2004).

These barriers to political engagement have significant consequences for the representation of marginalized interests in formal policy making. Legislators have few incentives to take up the concerns of populations with low political participation rates, and scholars have regularly reported that across a range of issues, legislators' policy choices predominantly respond to the interests of more advantaged groups (Gilens 2004; Gilens and Page 2014; Mayhew 1974). As a result, marginalized individuals' primary opportunities for political representation occur through advocacy by *interest groups* (Martinez 2009; Phinney 2017; Pinderhughes 1995; Strolovitch 2007).

However, interest group advocates for the marginalized also encounter considerable obstacles to influence. Organizations representing socially and politically marginalized individuals have fewer members, smaller budgets, and more limited issue agendas than private and professional groups (Schlozman, Verba, and Brady 2012; Strolovitch 2007). Furthermore, they are often funded by government grant programs, charitable

foundations, and membership dues, leaving them vulnerable to the preferences of political actors, patrons, and active members—many of whom are both influential in shaping these groups' advocacy agendas and represent the identities and priorities of the groups' most advantaged constituents (Imig 1996).

These structural limitations have important implications for the lobbying strategies of interest groups representing marginalized communities. Existing research has found that interest groups representing the marginalized prioritize broad-reaching issues at the expense of intersectional issues in lobbying, and over-represent class-based issues while underrepresenting gender-based issues relative to the proportions of poor and female members of their constituencies (English 2019a; 2020; Marchetti 2014; Strolovitch 2007). Through in-depth interviews, these studies also report that many of these groups highlight intersectional advocacy as central to their goals but note that it is difficult to pursue alone (Strolovitch 2007). Little more is known about the factors that may systematically moderate the occurrence of such advocacy—such as the strategic use of collaboration—or the influence of such advocacy, particularly in the administrative venue.

I argue that interest groups representing women, people of color, Native nations, and the poor strategically conduct intersectional advocacy—advocacy on behalf of multiply disadvantaged subgroups of marginalized groups—in administrative policy making by lobbying in *coalitions*. I further argue that intersectional advocacy is more influential when pursued as part of a coalition effort. I theorize that this strategic coalition use is driven by substantive and symbolic organizational constraints and that collaboration can enhance the influence of intersectional advocacy due to the more credible and expert nature of its advocacy. I argue that this credibility and expertise are a natural function of collaboration in administrative lobbying and that bureaucrats have strong incentives to prioritize the policy recommendations of such advocacy in their implementation of the law.

To test this theory, I leverage a novel dataset of cosignature patterns within 475 public comments

Maraam A. Dwidar , Assistant Professor of Political Science, Maxwell School of Citizenship and Public Affairs, Syracuse University, United States, [madwidar@maxwell.syr.edu](mailto:madwidar@maxwell.syr.edu).

Received: August 10, 2020; revised: April 29, 2021; accepted: June 28, 2021. First published online: August 13, 2021.

across 251 federal agency rules proposed between 2004 and 2014 (covering some 1,900 interest group cosignatories). Interest groups often use public comments to pursue policy advocacy, in large part by suggesting regulatory language. I identify policy advocacy occurring in coalitions through the incidence of cosigned public comments and use plagiarism detection software to determine a comment's "lobbying influence" by measuring the extent to which its language overlaps with that of its corresponding final rule.

I find that these interest groups are significantly more likely to pursue intersectional advocacy when lobbying collaboratively, but it is not coalition work, alone, that relates to influential intersectional advocacy. Rather, it is particular coalition characteristics, including organizational diversity and greater financial capacity, that predict such influence. I conclude that collaborative lobbying presents an avenue for interest groups representing the marginalized to rectify representational inequalities in their advocacy agendas and promote more pluralistic administrative policy making. This conclusion contributes to existing research by establishing a link between intersectional advocacy and collaborative interest group strategy and by illuminating advocacy conditions that generate influential intersectional representation. As such, it has important implications for our understanding of organizational behavior, intersectional representation, and bureaucratic responsiveness, and for the possibilities of representative democracy more generally.

## THEORETICAL FOUNDATIONS AND ARGUMENT

When are intersectionally marginalized individuals represented in politics? In answering this question, scholars have long considered the formal and informal activities of citizens, protest movements, and elected officials, with occasional reference to interest groups (Brown et al. 2017; English 2019a; 2020; Gerшон et al. 2019; Laperrière and Lépinard 2016; Marchetti 2014; Purdie-Vaughns and Eibach 2008; Reingold, Widner, and Harmon 2019; Skrentny 2002; Strolovitch 2007). Others have noted that collaborative lobbying is conducive to the nature of intersectional advocacy, comprises the majority of interest group activity, and can yield influence over policy making (Hula 1999; Nelson and Yackee 2012; Strolovitch 2007); however, this body of work remains limited. For instance, while scholars have observed that intersectional advocacy by interest groups is uncommon and speculated that coalitional strategy may enhance the intersectional advocacy efforts of organizations, the *occurrence* and *influence* of these efforts, as well as the factors moderating them, have yet to be systematically assessed by the literature. Furthermore, few have considered these subjects in the context of administrative policy making—where, increasingly, the bulk of policy decision making occurs.

## Interest Groups and the Bureaucracy

Over the course of the last several decades, the reach of American federal bureaucracy has grown substantially. Approximately 90% of all U.S. law is of agency, rather than legislative, origin (Warren 2018). This trend is no fluke; as the major political parties polarized in the 1970s, substantive lawmaking by the U.S. Congress declined and language in passed legislation grew—and continues to grow—increasingly vague (Lewallen 2020). The bulk of modern policy making has thus concurrently and steadily fallen to bureaucrats serving in federal agencies as they craft and promulgate rules implementing provisions of the law (Potter 2019).

An unintended consequence of this rise in bureaucratic lawmaking has been a corresponding rise in the power of interest groups. Interest groups help bureaucrats to sway public opinion (Hrebenar 1997), raise awareness of policy issues facing agencies (Hrebenar 1997; Rourke 1984), resist political control (Carpenter 2002), secure budgets (Berry 1989), and compose regulatory language (Haeder and Yackee 2015). Federal law also requires agencies to solicit opinions from interest groups and private citizens when writing rules, and courts have historically encouraged agencies to be more responsive to groups and citizens who express opinions during this process (McGarity 1992; 1997; Rabin 1986; Shapiro 1988). Federal agencies thus have strong incentives to consider the policy recommendations of interest groups, and they often do.

While scholars have traditionally conceived of interest groups as partners with Congress in influencing the bureaucracy (see Epstein and O'Halloran 1996; 1999; McCubbins, Noll, and Weingast 1987; 1989; McCubbins and Schwartz 1984), a growing body of work has pointed to the direct influence of interest groups over bureaucratic policy making. For instance, interest groups independently assist the bureaucracy by providing expert information during notice-and-comment rulemaking and are often successful in shaping its policy outputs (Cropper et al. 1992; Golden 1998; Haeder and Yackee 2015; Hrebenar 1997; McKay and Yackee 2007; Nelson and Yackee 2012; Yackee 2006; 2012). This expert information alerts bureaucrats to problems with proposed regulations, and, when taken in context (i.e., when there is a consensus across the information sent to bureaucrats), agencies are better able to use interest group comments to alter proposed rules (Croley 1998; Golden 1998; McKay and Yackee 2007; Nelson and Yackee 2012). Further, Nixon, Howard, and DeWitt (2002) report that "privileged" interest groups do not dominate influence in notice-and-comment rulemaking.<sup>1</sup> Nelson and Yackee (2012) report that consensus across lobbying coalitions, as well as the size of coalitions, are predictors of policy influence.

<sup>1</sup> Nixon, Howard, and DeWitt's (2002) "privileged" interest groups refer to Self-Regulating Organizations (SROs)—private organizations explicitly formed to regulate certain industries or professions and thought to enjoy special influence over bureaucratic policy making.

In addition, the role of judicial review in bureaucratic proceedings underscores interest groups' direct influence over agency policy making. All agency rules are subject to judicial review to ensure that they follow legislative mandates and procedural requirements. In support of this oversight mechanism, federal courts have required the bureaucracy to keep a meaningful written record (encompassing proposed and final rules, public comments, and relevant studies or data) to assist in this process and to enhance the responsiveness of the bureaucracy to participants in rulemaking (Magat, Krupnick, and Harrington 1986; Seidenfeld 1997). The threat of potential court action, as well as courts' reliance on the written record, have thus increasingly provided opportunities for outside groups to influence agency rulemaking and strongly incentivized agencies to carefully consider their comments (Chubb 1983; West 1984).

### Interest Groups as Advocates for the Marginalized

Many types of interest groups lobby on behalf of marginalized individuals, including citizen groups, labor unions, legal advocates, nonprofit service providers, and think tanks (Baumgartner et al. 2009; Schlozman and Tierney 1986; Strolovitch 2007). In addition to their policy advocacy, they often work to mobilize, educate, and serve their constituents at the grassroots level (Han, McKenna, and Oyakawa 2020). Scholars have frequently pointed to these groups as key representatives for their constituents in public policy making, with origins in social movements for women's rights and civil rights in the early and mid-1900s (Marquez 2003; McConnaughy 2013; Pinderhughes 1995; Strolovitch 2006).

While many of these groups are prominent and influential actors, they too are plagued by barriers to their political influence and biases in their representation (English 2019a; 2019b; 2020; Marchetti 2014; Martinez 2009; Strolovitch 2007). Organizations representing socially and politically marginalized individuals have smaller budgets, memberships, and staff and more-limited advocacy agendas than do private and professional groups (Schlozman, Verba, and Brady 2012; Strolovitch 2007). Their work is frequently funded by paying members' dues, charitable foundations, patrons, and government grant programs, leaving them beholden to the preferences of these actors—many of whom represent the identities and priorities of the groups' most advantaged constituents (Imig 1996; Phinney 2017; Staggenborg 1986; Strolovitch 2007).

As an example, the advocacy agendas of the National Organization for Women (NOW), the Feminist Majority Foundation (FMF), and the American Association of University Women (AAUW)—the nation's oldest feminist organizations—have recently been decried for their systemic promotion of white women's political interests at the expense of those of women of color. In a piece published in *The Lily*, staffers of these organizations attributed the groups' neglect of

women's intersectional interests to their disapproving members and patrons, explicitly stating that “the folks [providing] funding ... were less interested in women of color and more interested in more quote-unquote ‘neutral’ topics.”<sup>2</sup>

The trend described by these staffers refers to the framework of *intersectionality*, founded by Black feminists (see Combahee River Collective 1977; Truth 1851) and coined by Crenshaw (1991). This framework describes the manner in which different biological, cultural, and social categories—such as race, gender, and class—intersect to create compounding systems of discrimination and oppression. Scholars including English (2019a; 2020), Marchetti (2014), and Strolovitch (2006; 2007) have applied this framework to the study of interest group advocacy, emphasizing that intersectionality structures every facet of individuals' life experiences and manifests in “interlocking” or “simultaneous” oppressions. Their works note that the representational choices of interest groups—even those that represent marginalized individuals—can reinforce or mediate these oppressions, leading to majoritarian bias in interest group advocacy (English 2019a; 2020; Marchetti 2014; Strolovitch 2006).

For example, interest groups representing the marginalized routinely prioritize the interests of their more advantaged constituents—such as male, rather than female, racial minorities—at the expense of their intersectionally disadvantaged constituents (Strolovitch 2007). As such, intersectional advocacy comprises a small proportion of their policy agendas and its occurrence is largely governed by organizational contexts. For example, some social and economic justice organizations exist exclusively to promote intersectional advocacy, and while this population of groups is small, at the national level it has steadily grown over time (Strolovitch 2018). Additionally, scholars have reported that state- and local-level advocacy organizations are more likely than national-level organizations to promote intersectional advocacy (Berry and Arons 2005; Skrentny 2002) and that national-level groups with connections to state-level affiliates attend to intersectional issues more frequently (Strolovitch 2007). However, more recent work on this topic has found that state- and local-level interest groups largely perpetuate the same biases as national-level groups. Marchetti's 2014 survey of state-level organizations, for instance, reports that while these groups frequently pursue intersectional advocacy surrounding issues of class, they systematically neglect intersectional advocacy surrounding issues of gender, race, sexuality, and ability. Scholars have thus argued that intersectional advocacy is largely governed by organizational priorities, centered around the need to pursue expedient and “winnable” policy advocacy *and* to appeal to their advantaged active supporters (Marchetti 2014).

<sup>2</sup> <https://www.thelily.com/how-many-women-of-color-have-to-cry-top-feminist-organizations-are-plagued-by-racism-20-former-staffers-say/>.

Biases in interest groups' advocacy agendas are also certainly influenced by the broader political environment. In particular, the documented growth of government (beginning in the late 1950s and continuing through the 1970s) expanded government responsibilities into many new policy areas (see Jones, Theriault, and Whyman 2019) and contributed to the rapid and commensurate growth of the interest group population (Baumgartner and Leech 1998; Baumgartner et al. 2009; Hojnacki 1997). This growth of the interest group population subsequently influenced organizations' capacities and priorities, as groups became increasingly compelled to specialize, strategize, and fundraise in greater volumes in order to enhance their effectiveness in a crowded decision-making environment (Hojnacki 1997). Interest groups' systemic prioritization of advantaged interests and marginalization of intersectional interests in lobbying can thus also be characterized, in part, as a strategic response to an expanding national government, a limited and competitive policy agenda, and an overgrown interest group population.

### Lobbying Coalitions and Intersectional Rulemaking

Importantly, these representational biases do not mean that organizational advocates for the marginalized cannot or do not want to address intersectional issues among their constituents, merely that it is unlikely for this advocacy to comprise a large proportion of their work (Marchetti 2014; Strolovitch 2007). Many of these organizations, in fact, report interest in intersectional policy work and dedicate considerable effort to remedying inequalities in their advocacy (Strolovitch 2007). As such, I argue that interest groups representing the marginalized strategically respond to organizational constraints by conducting intersectional advocacy in administrative policy making in *coalitions*. Indeed, existing research has shown that organizations representing the marginalized frequently collaborate in their efforts to influence public policy and has argued that coalitional advocacy is, by definition, intersectional advocacy (Phinney 2017; Strolovitch 2007).

Lobbying coalitions—defined as any coordinated effort by more than one interest group to lobby a government entity as a *team*, with the objective of advancing a policy agenda—are a common interest group strategy. They allow individual groups, particularly those representing weaker, more diffuse interests, to overcome barriers to advocacy, and they are considered a critical and effective lobbying strategy (Heaney 2004; Hula 1999; Lorenz 2019; Nownes 2007; Schlozman and Tierney 1986). In fact, over 80% of interest groups believe coalitional lobbying to be effective for influencing public policy, and a growing scholarship has affirmed the relationship between coalitional lobbying and interest group policy influence (Junk 2019; Lorenz 2019; Phinney 2017).

Many have thus examined the presence of and incentive structure underlying interest group coalitions in lobbying. Nearly all of this research reports that the majority of national-level lobbying by organizations

occurs in coalitions (Baumgartner et al. 2009; Hojnacki 1997; Hula 1999; Kerwin 2003; Schlozman and Tierney 1986). Laumann (1987) and Hojnacki (1997) report that a group's choice to join a coalition is strongly influenced by the type and range of information it has regarding potential coalition partners including perceived policy influence, scope of interest in particular issues, or perceived organizational reputation/character. For individual actors, the benefits of joining a coalition often outweigh the costs (and increase the likelihood of joining a coalition) when organizations “pivotal to success” are members of the coalition (Hojnacki 1997). The broader policy environment, of course, also plays a role. When opponents in a policy debate are strong, an interest group actor derives greater benefits from lobbying in a coalition and is more likely to join one (Hojnacki 1997).

These trends have encouraged a burgeoning body of research investigating the relationship between coalitional lobbying and policy outcomes, with mixed findings. Heinz et al. (1993), Gray and Lowery (1998), Mahoney and Baumgartner (2004), and Haider-Markel (2006), for instance, find either no relationship or a negative relationship between coalitional lobbying and policy outcomes. McKay and Yackee (2007), Baumgartner et al. (2009), Nelson and Yackee (2012), Phinney (2017), Lorenz (2019), and Dwidar (2021) observe positive relationships between collaborative lobbying and policy influence, noting that diverse collaborations are more likely to influence policy agendas and outcomes and that group consensus and coalition size enhance the influence of lobbying coalitions in notice-and-comment rulemaking.

My argument is premised on several notions developed by these bodies of work. Coalitions provide significant benefits to interest groups that represent the marginalized. These groups have limited institutional resources relative to their mainstream counterparts. For example, only a small proportion of organizations representing socially and economically marginalized individuals—fewer than 30%—retain a legal staff (Strolovitch 2007). Only 25% employ lobbyists, and a mere 20% maintain political action committees (PACs; Strolovitch 2007). In contrast, among the broader interest group population, 50% retain a legal staff, 54% employ lobbyists, and 60% maintain PACs (Strolovitch 2007). These organizational characteristics reflect limited tactical, social, and informational capacity among interest group representatives of the marginalized.

Coalitions allow interest groups to expand their capacity in all of these respects while reducing the financial cost of lobbying. This expanded capacity may include, but is not limited to, expanded social ties, access to greater political and policy expertise, and enhanced credibility. Collaboration should thus be a highly attractive lobbying strategy for interest groups representing the marginalized. And indeed, it is: interest groups representing socially and economically marginalized individuals rely heavily on coalitional strategy in lobbying as a function of its capacity to lend credibility and conserve resources (Phinney 2017; Strolovitch 2007).

Coalitions also offer lower-profile opportunities for interest groups representing the marginalized to engage with intersectional policy issues. As noted earlier, interest groups representing the marginalized limit their advocacy on these particular issues (English 2019a; 2020; Marchetti 2014; Strolovitch 2006), as key actors within such organizations often frown upon expending scarce resources on “controversial” or “narrow” policy topics (Staggenborg 1986; Strolovitch 2006). This pattern is linked to the disproportionate resource limitations faced by these organizations and largely a function of ambivalence, disinterest, or disapproval on the part of their active members and patrons towards such advocacy—as many of these actors are both influential in funding and shaping organizational agendas and do not often share the identities or priorities of the groups’ multiply disadvantaged constituents (Strolovitch 2007).

As an example, consider the National Organization for Women’s (NOW) recent advocacy surrounding the Equal Rights Amendment (ERA). The ERA, first introduced in 1923, seeks “legal equality of the sexes”; however, it has been consistently criticized for its erasure of women’s intersectional identities and needs (Kitchener 2020). In 2017, NOW was asked to support the “Intersectional ERA,” an alternative to the original ERA to be introduced by Congresswoman Pramila Jayapal. As described in an article published in *The Lily*, leaders and patrons of the organization were hesitant to support the bill due to its narrower focus and explicit protection of a wide range of intersecting identities, including women marginalized on the basis of faith (Kitchener 2020). They worried that such a focus would distract from the broader goals of their feminist advocacy. Debates on the subject within the organization caused significant internal strife and were later the subject of a series of exposés (see Kitchener 2020 and Shugerman 2020). While the Intersectional ERA was ultimately not introduced to Congress, a keyword search in public comment records indicates that NOW has since referenced the content of the Intersectional ERA on one occasion, as a part of a collaboration—the ERA Coalition—in 2020.<sup>3</sup> In the same year, NOW, as a single organization, submitted 12 comments referencing, in broad capacities, the content of the original ERA.

As evidenced by this example, collaborative strategy can allow interest groups to advocate on behalf of important, but internally controversial, policy issues without expending scarce, or significant, resources and without drawing the ire of members and patrons by providing “cover” for their efforts. In the case of NOW, organizational leaders were hesitant to promote the Intersectional ERA due to conflict sur-

rounding its scope, but they ultimately did so through a collaborative effort. By comparing the advocacy of the organization on the Intersectional ERA and its broader counterpart, it is clear that participating in the ERA Coalition offered a strategic and lower-profile opportunity (i.e., “cover”) for the intersectional advocacy. In other words, the deliberate use of coalitions by these organizations can make clear to disapproving key actors that intersectional advocacy is not occurring at the expense of broader organizational priorities (Strolovitch 2007). I thus expect that interest groups representing women, people of color, Native nations, and the poor are more likely to conduct intersectional advocacy when lobbying in coalitions (*Hypothesis 1*).

Finally, coalition building often yields greater lobbying influence.<sup>4</sup> As discussed previously, organizational resources moderate groups’ abilities to effectively lobby. Developing effective policy recommendations is an expensive task, requiring time, expertise, and, often, the employment of legal staff. Collaborative lobbying efforts enhance the abilities of individual groups to develop such policy recommendations. This phenomenon should be magnified for interest groups representing the marginalized, for whom resource scarcity is a more formidable obstacle. As such, I expect intersectional advocacy by interest groups representing women, people of color, Native nations, and the poor to be more influential when pursued as part of a coalitional effort (*Hypothesis 2*).

Here, it is important to note that the relationship between coalitional lobbying and policy influence is certainly moderated by the characteristics and incentives of the corresponding institutional process. In this case, the institutional process is that of notice-and-comment policy making by the federal bureaucracy, where informational content plays a uniquely important role. Bureaucrats are often experts with far greater information than their legislative or executive counterparts (Potter 2019). However, bureaucrats also have strong incentives to respond to public and stakeholder preferences—they seek to avoid public scandal, critique by political principals, and judicial review in response to their decisions (Redford 1969; Workman 2015). They are also highly professionalized, with strong incentives to seek the best implementation protocol for the provisions of the law they are tasked with implementing. Therefore, bureaucrats regularly process and react to external information provided by lobbying efforts. A growing body of work

<sup>3</sup> This search was executed by building a query within [Regulations.gov](https://www.regulations.gov) returning all comments containing the keyword “National Organization for Women” during the period in question (January 1, 2017 to December 31, 2020) and reviewing the content of each comment.

<sup>4</sup> Relatedly, scholars have debated whether it is possible, or at all fruitful, to measure interest group influence in a valid manner due to challenges posed by lobbying dynamics and data availability (Baumgartner and Leech 1998; Dür and De Bièvre 2007; Klüver 2009; Mahoney 2007; Pedersen 2013). However, studies seeking to develop such measures in the administrative context—by leveraging case studies, surveys, and text-analytic tools—have both successfully developed such measures and consistently reported that interest groups do exercise influence in the administrative policy process (Dwidar 2021; Golden 1998; Haeder and Yackee 2015; Yackee and Yackee 2006).

has repeatedly pointed to the value of coalitional efforts in this policy-making venue, noting that the coalitional lobbying of federal agencies is common and can be highly effective (Dwidar 2021; Nelson and Yackee 2012).

## DATA

I assess my hypotheses by examining the incidence of coalitional efforts in public comments by interest groups representing women, people of color, Native nations, and the poor, as well as the extent to which federal agencies altered their rules during the notice-and-comment rulemaking period based on comments containing intersectional advocacy by these groups—advocacy on behalf of multiply disadvantaged subgroups of marginalized groups. To do so, I selected a sample of interest groups representing women, people of color, Native nations, and the poor and collected all public comments submitted by these groups between 2004 and 2014. I then examined cosignature patterns on and the content of each of these documents to code for the presence of coalitions and occurrence of intersectional advocacy. Finally, I collected the corresponding final agency rules and, leveraging text analysis tools, developed a measure of each intersectionally oriented comment's influence over the corresponding final rule.

## Notice-and-Comment Rulemaking

Bureaucratic policy making is derived from the joint lawmaking authority of Congress and the President and regulated by the Administrative Procedure Act (APA). The APA dictates that upon passage, provisions of new law must be sent to the appropriate federal agencies for implementation. The most common form of this implementing process is “notice-and-comment” rulemaking, which begins with agencies’ drafting of “proposed rules.” Once drafted, the APA requires that these proposed rules be made public for specified “notice-and-comment” periods. During this time, members of the public—including interest groups, political actors, or private citizens—may submit written comments regarding the proposed rule. These comments are an important source of information for bureaucrats, as commenters often have high levels of subject-area expertise. When these periods come to a close, agencies must review all comments and issue final rules, which then become legally binding.

Final rules often, but do not necessarily, differ from their proposed rules. While agencies regularly adopt the recommendations of commenters, they are not required to alter proposed content to fit with the preferences of comments (Kerwin 2003). However, the judicial review of rules strongly incentivizes agencies to engage with public comments in good faith (McGarity 1992; 1997; Rabin 1986; Shapiro 1988) and a large volume of recent work has found evidence of comment influence in the notice-and-comment period (Dwidar 2021; Haeder and Yackee 2015; McKay and Yackee 2007; Yackee 2006; 2012; Yackee and Yackee

2006). Scholars have also noted that interest groups dominate submissions made during notice-and-comment periods (Croley 1998; Golden 1998; Kerwin, Furlong, and West 2011; West 2004).

## Interest Group and Rule Selection

This study considers 475 public comments submitted by a random sample of 75 interest groups active in national politics representing women, people of color, Native nations, and the poor, leveraging data provided by the Center for Responsive Politics (CRP).<sup>5,6</sup> I identified the population of organizations representing women, people of color, Native nations, and the poor at the national level using the CRP's category codes for policy focus, originally drawn from lobbying disclosure reports.<sup>7</sup> I defined “active in national politics” to include interest groups that had submitted at least one lobbying disclosure report during the period under consideration. Additionally, it is important to note that this interest group sample size was chosen strategically, for practical reasons. To generate data for this sample of groups and corresponding set of public comments, over 5,000 comments were read and nearly 2,000 coalition members were hand-coded across seven attributes (producing approximately 14,000 observations). This sample size therefore represents a reasonable compromise between practical limitations and inferential strength.

The set of groups in the sample reflects a range of interest group participants in politics, as detailed in Table 1, below. The majority of the sample is composed of not-for-profit organizations and Native American tribes, such as the Affordable Housing Centers of America and the Catawba Indian Nation. Advocacy groups and not-for-profit business leagues form the next-largest segment of the sample. Examples include the Asian American Justice Center, the Feminist Majority Foundation, and Immigration Voice. One member of the sample, the Institute of American Indian Arts, is an academic institution. No businesses, unions, or professional associations are present in the sample. See Appendix A of the Supplementary

<sup>5</sup> The sample of 75 groups was randomly generated using the `sample` command in Stata, which generates a random subset of observations from a dataset without replacement (see more detail here: <https://stats.idre.ucla.edu/stata/faq/how-can-i-draw-a-random-sample-of-my-data/>). Specifically: I downloaded data on all organizations that submitted at least one lobbying disclosure report between 2004 and 2014 and self-reported lobbying on any of four policy issues (minority/ethnic groups, Native American tribes, women's issues, and welfare) from the CRP's bulk data repository ( $N = 292$ ). I then imported a spreadsheet containing data on the above-mentioned organizations into Stata. Finally, I used the `sample` command in Stata to generate a random subset of 75 observations (groups) from this spreadsheet without replacement.

<sup>6</sup> The sample originally contained 75 interest groups. One group did not submit any public comments during the period under consideration.

<sup>7</sup> In lobbying disclosure documents, organizations must self-identify their policy focus. As noted in Footnote 5, I drew my sample from the set of all active groups that self-identified as primarily lobbying on the following policy issues: minority/ethnic groups, Native American tribes, women's issues, and welfare.

**TABLE 1. Sample by Organizational Type**

Organizational type	Frequency	Percentage
Nonprofit organization	18	24.32
Advocacy group	7	9.46
Native American tribe	45	60.81
Not-for-profit business league	3	4.05
Academic institution	1	1.35
Total	74	100%

Materials for the organizational type coding scheme used. A list of the groups appearing in this sample is available in Appendix B of the Supplementary Materials.

Table 2 details the policy foci of this sample. Interest groups focusing on Indigenous policy issues make up the largest proportion of the sample—over 60%. However, this trend is not particularly surprising, as it reflects a similar one among the broader lobbying population. Among all organizations representing women, people of color, Native nations, and the poor in the CRP's data during the period under consideration, approximately 40% represent Native American interests.<sup>8</sup> Organizations focusing on minority/ethnic policy issues represent approximately 23% of the sample. Groups representing welfare policy issues make up approximately 14% of the sample; those lobbying primarily on women's policy issues comprise just under 3% of the sample.

Due to the large number of Native American tribes in this sample, it is worth noting that tribal nations differ from traditional interest groups in key ways including, prominently, their status as sovereign nations and, correspondingly, their unique relationship with the federal government. However, despite these characteristics, Native nations are not entirely autonomous decision makers. Federal policy making can significantly influence the functions and needs of Native nations; therefore, they are active contenders in American lobbying.<sup>9</sup> In particular, since the passage of the Indian Gaming Regulatory Act (IGRA) in 1988—which provided tribal nations with the financial resources to become players in the American political system—Native nations have consistently engaged in lobbying efforts to protect and improve their treaty, land, resource, and civil and

<sup>8</sup> I arrived at this statistic by computing the proportion of Native American tribes appearing in the Center for Responsive Politics' (CRP) repository of all organizations lobbying on women's issues, minority/ethnic issues, and welfare issues (the set of groups from which my sample was drawn) during the period 2004–2014 (the period under study in this work). This statistic, in its demonstration that Native tribes comprise a large proportion of the population under study, should lend confidence to the representative nature of my sample.

<sup>9</sup> Here, the term "contender" refers to Schneider and Ingram's (1993) "emergent contenders"—groups that have been historically compromised in American politics but have steadily gained degrees of power and influence resembling those of mainstream lobbying organizations.

**TABLE 2. Sample by Policy Focus**

Policy focus	Frequency	Percentage
Minority/ethnic groups	17	22.97
Native American tribes	45	60.81
Welfare	10	13.51
Women's issues	2	2.70
Total	74	100%

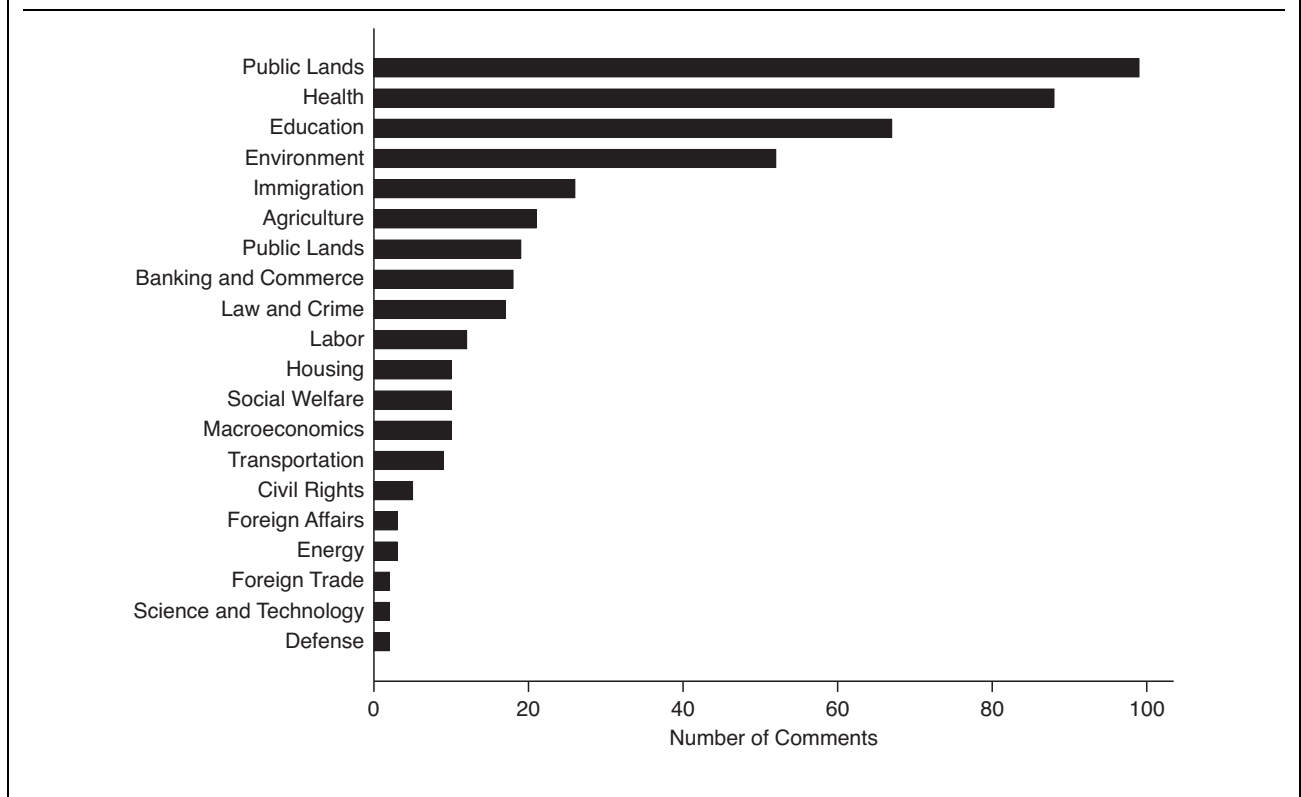
political rights (Corntassel and Witmer 2008; Mason 1998; 2000; Steinman 2004; Witmer and Boehmke 2007; Witmer, Johnson, and Boehmke 2014).

Therefore, there exists strong scholarly support for the inclusion of Native American tribes in works examining interest group representation of marginalized populations (Boehmke and Witmer 2012; Witmer and Boehmke 2007; Witmer, Johnson, and Boehmke 2014). Scholars of tribal political activity report that tribal lobbying is motivated by the same factors that motivate traditional interest groups (issues, access, ideology, and constituent interests) and is both common and substantively similar to lobbying by traditional groups (Boehmke and Witmer 2012; Witmer and Boehmke 2007; Witmer, Johnson, and Boehmke 2014). Further, scholars have documented that tribal nations have strategically sought political incorporation by adopting interest group strategies that stem naturally from their preexisting governmental and leadership structures rather than pursuing representation through election to political office. There is thus strong theoretical grounding for the inclusion of these actors in my sample.

The public comments under consideration were submitted on 251 rules proposed by 54 federal agencies.<sup>10</sup> The agencies appearing in the data span a range of sizes and policy specializations—from the Bureau of Indian Affairs to the Department of Health and Human Services to the Equal Employment Opportunity Commission—as well as a mix of independent (25%) and executive branch (75%) agencies.<sup>11</sup> A list of the agencies appearing in these data is available in Appendix C of the Supplementary Materials. The rules also span a range of policy topics. As illustrated by Figure 1, 20 out of the 21 major topics proposed by the Policy Agendas Project's (PAP) common policy coding scheme are present. The majority of proposed rules in the data fall in the areas of public lands, health, and education policy—at approximately 20, 18, and 14% of all proposed rules, respectively. This characteristic is not surprising, as the sample, like its broader population, contains a large proportion of Native interests (see Table 1) and health

<sup>10</sup> For reference, approximately 3,000 rules are published each year in the Federal Register, the official publication for activities of the federal bureaucracy, and there are between 250 and 400 federal agencies in existence. See Administrative Conference of the United States, *Sourcebook of United States Executive Agencies*, 2012.

<sup>11</sup> See Administrative Conference of the United States, *Sourcebook of United States Executive Agencies*, 2012.

**FIGURE 1. Proposed Rules by Policy Topic**

care and education reform have been ubiquitous on the national policy agenda over the last decade and a half. The rules are also characterized by ranges of complexity and salience. They include straightforward, low-salience proposals, such as a revision to a rule governing Women, Infants, and Children (WIC) food packages' dietary guidelines, and more technical and salient efforts, such as the proposition of a rule governing the coverage of certain contraceptive services under the Public Health Service Act.

### Collecting and Preprocessing Comments and Rules

To collect all public comments submitted by each interest group in my sample, as well as the corresponding final rules, I relied on [Regulations.gov](https://www.regulations.gov)'s interactive Application Programming Interface (API).<sup>12</sup> This process required four steps.

First, for each interest group in the sample, I built a query containing parameters for docket type (rulemaking), comment period (closed), received date range (January 1, 2004 to December 31, 2014), and keyword (name of the interest group). I then read each comment

<sup>12</sup> [Regulations.gov](https://www.regulations.gov) is an Internet portal and document repository containing all public comments submitted on proposed federal agency rules (as well as other rulemaking documents) dating back to at least 1980. The portal's API allows for the calling documents containing specific terms while controlling for submission dates, document types, and agencies.

returned by the query and removed false positive results.<sup>13</sup> Next, I used optical character recognition (OCR) software to transcribe each comment, which I augmented with manual transcription and error correction where necessary. Finally, I preprocessed each document, which involved the conversion of all words to their stems<sup>14</sup> and removal of capitalization, punctuation, stop words<sup>15</sup>, graphics, figures, and appendices—in line with standard conventions for text analysis (Grimmer and Stewart 2013).

### Dependent Variables

As described above, I investigate two dependent variables in this article: the occurrence of intersectional advocacy and the influence of intersectional advocacy.

<sup>13</sup> The API only allows for free-text searches rather than searches by author or cosignatory. As a result, the search I describe yielded all comments in which a given interest group was *mentioned* rather than all comments *authored* by a given interest group. For reference, the initial searches for the 75 groups examined for this project returned roughly 5,000 comments of which 475 had been submitted by groups in the sample.

<sup>14</sup> A "stem" is the root of a word that remains after suffixes are removed. For example, the words "fishing," "fished," and "fisher" all share the same stem: "fish." Stemming words in a corpus allows for the grouping of words that share a common meaning, but are superficially different (Grimmer and Stewart 2013; Porter 1980).

<sup>15</sup> Words that primarily serve a grammatical purpose and otherwise do not convey meaning (Grimmer and Stewart 2013). Examples include "a," "and," "but," "how," "or," and "what."



**TABLE 3. WCopyfind Comparison Rules**

Shortest phrase to match<sup>a</sup>: six words  
 Most imperfections to allow between perfectly matching portions of a phrase<sup>b</sup>: two  
 Minimum percentage of matching words<sup>c</sup>: 100%  
 Skip nonwords<sup>d</sup>  
 Skip words longer than 20 characters<sup>e</sup>

<sup>a</sup> Minimum string length considered to be a match.

<sup>b</sup> Maximum number of nonmatches allowed between perfectly matching portions of a phrase.

<sup>c</sup> Minimum percentage of perfect matches that a phrase can contain and be considered a match. Setting this value at 100% limits WCopyfind to returning only perfect matches.

<sup>d</sup> Words containing any characters other than letters, except for internal hyphens and apostrophes.

<sup>e</sup> Often nontextual items, including file names, URLs, or image data.

To operationalize the *occurrence of intersectional advocacy*, I read the entirety of each public comment and identified whether or not it discussed and promoted a concrete policy recommendation pertaining to the interests of an intersectionally marginalized population. I defined an “intersectionally marginalized population” as any population that contained multiply disadvantaged subgroups of marginalized groups. This included any combination of populations marginalized on the basis of gender, race, income, age, sexual orientation or identity, ability, and immigration/citizenship status. Examples of such populations may include women of color, children living in poverty, or LGBTQ youth.

More specifically, I searched for two signals: an explicit reference to an intersectionally marginalized population (e.g., “economically disadvantaged women”) and an explicit policy position or recommendation pertaining to the interests of this group (e.g., “we recommend that [the Small Business Association] use in its disparity calculations ... other data sources that will allow for a more complete picture of the availability of women-owned businesses”).<sup>16</sup> This position or recommendation could have taken any form so long as it specifically identified the desired policy output (such as generally supporting or opposing policy direction/content, recommending the striking, amending, or adding of policy language, or requesting or providing context or detail regarding the proposed policy). This recommendation could have constituted the entirety of a comment or could have been one of several policy recommendations. This variable is binary in nature. For examples of intersectional policy recommendations observed in the data, see Appendix D of the Supplementary Materials.

To operationalize the *influence of intersectional advocacy*, I compared the text of each comment of intersectional nature with its corresponding final rule and produced a measure of textual similarity between the documents. I did so using WCopyfind, a software package that compares textual documents and reports similarities in their words and phrases. WCopyfind allows users to select and edit comparison rules before

use. I adopted the comparison rules available in Table 3, above, to detect all *perfectly matching* phrases between comment–final rule pairs.<sup>17</sup> I then recorded the number of words contained in all perfectly matching phrases for each comment–final rule pair—my ultimate operationalization. This variable spans a wide range, from 0 to 741 (mean = 54; standard deviation = 100).<sup>18</sup>

### Independent Variables

My key predictor variable is the *coalition status* of a given comment. I operationalized this variable by manually examining the signature line of each comment. If the comment was signed by more than one interest group, I assigned the *coalition status* variable a value of 1; otherwise, I assigned it a value of 0.<sup>19</sup>

Besides this key independent variable, I collected a number of secondary control variables. First, I collected information on the capacity of the interest group author(s) of each comment. As I describe above, interest groups may be more likely to pursue intersectional advocacy when they have greater financial resources. To account for this possibility, I recorded a measure of

<sup>17</sup> These decision rules are straightforward to implement, and existing work suggests that they are reliable for detecting text reuse in policy documents (Clough and Stevenson 2011; Kroeger 2016; Lyon, Malcolm, and Dickerson 2001).

<sup>18</sup> See Appendix E of the Supplementary Materials for an example of a perfectly matching phrase identified using this methodology.

<sup>19</sup> For purposes of consistency, all organizations in the sample—including those that served as umbrella organizations or formal coalitions—were treated as single groups. In other words, if they appeared as the sole signatory on a comment, they received a “0” code under the *coalition status* variable. If they did not appear as the sole signatory, they received a “1” code under the *coalition status* variable. As an example, the Leadership Conference on Civil and Human Rights (LCCR)—a member of my sample and a formal coalition—consists of over 200 national civil and human rights organizations, including the AAUW, the National Women’s Law Center, and the National Council of Asian Pacific Americans. However, the LCCR functions as a singular organization, maintaining a name, staff, and tax filings separate from those of its members. The LCCR also frequently submits public comments individually (i.e., on behalf of all its organizational members—for which it would receive a “0” in my coding scheme) and in coalitions (i.e., in consort with organizations outside of its membership—for which it would receive a “1” in my coding scheme).

<sup>16</sup> These quotations derive from a public comment submitted by Federally Employed Women to the Small Business Association.

the *financial capacity* of each comment author. If a comment was submitted in a coalition, I aggregated this measure across the coalition. If not, I recorded the data for the single author. I operationalized this measure through each group's total revenue in the year of comment submission.<sup>20</sup> I collected this information from 990 forms available on the website of ProPublica. This variable ranges from 3,918 to 185,000,000 (mean = 5,939,071; standard deviation = 15,700,000). As an additional measure of capacity, I recorded the *size* of each coalition, operationalized through the total number of members (mean = 16; standard deviation = 47). Comments not submitted by coalitions were recorded as having one member.

Second, I collected information on the *salience* of each proposed rule. Not all proposed rules are equally important or visible to subsystem actors. When a proposed rule is more consequential or salient, more actors may enter the debate, often by submitting public comments. In this more crowded and visible policy environment, intersectional advocacy efforts may be less likely to occur and may experience lesser influence. To account for these likely relationships, I operationalized the *salience of each proposed rule* by collecting the total number of comments submitted in response to it. This variable spans a wide range, from 0 to over 2,600,000 (mean = 43,767; standard deviation = 236,926).

Third, I measured the *complexity* of each proposed rule. Intersectional advocacy may also be more likely to occur when lobbying on proposed rules that are more complex. More technical, or complex, rules often span multiple policy domains and constituencies. By nature, intersectional advocacy is more likely to be concerned with such rules. To account for this possibility, I operationalized the *complexity of each proposed rule* through the number of distinct policy subtopics encompassed by each proposed rule.<sup>21</sup>

Fourth, I identified groups with explicitly intersectional missions. Interest groups with intersectional missions—those that exist solely to represent an intersectionally marginalized population—are, by virtue of their organizational goals, more likely to pursue intersectional advocacy. To account for this relationship, I identified the presence of an *intersectional mission* for each interest group in my sample. I did so by navigating to the website of each group in my sample and reading their mission statement. If a group's mission statement purported to solely represent an intersectionally marginalized population—such as the National Network for Youth, which advocates on behalf of youth experiencing homelessness—I identified the group as

intersectional and assigned the variable a value of 1; otherwise, I assigned it a value of 0.<sup>22</sup>

Fifth, I gathered information on the organizational diversity of coalitions. Lobbying coalitions that are organizationally diverse are often more influential (Dwidar 2021; Lorenz 2019). This relationship should hold exceptionally true in administrative policy making, as diverse coalitions are better able to facilitate the production of expert and balanced proposals backed by broad consensus, which bureaucrats have strong incentives to prioritize (Dwidar 2021; Nelson and Yackee 2012). I thus developed a measure of the *presence of organizational diversity* in each coalition. I considered the presence of diversity rather than the degree of diversity due to existing research that has reported a threshold effect relating to the entry of diversity to decision-making bodies (see Kastellec 2013), and particularly so in the context of bureaucratic lobbying coalitions (see Dwidar 2021). I classified each coalition member into one of 12 categories demarcating their organizational type (see Appendix A of the Supplementary Materials for the coding scheme used). Using these data, I then calculated normalized Shannon's  $H$ —a standard diversity index for instances where there are a set number of categories across which diversity can occur<sup>23</sup>—as a measure of the level of organizational diversity of each coalition, defined as:

$$H(X) = -\frac{1}{\ln(n)} \sum_{i=1}^n (p_i) * \ln(p_i),$$

where  $x_i$  represents the  $i^{\text{th}}$  organizational type,  $p_i$  is the proportion of total attention the  $i^{\text{th}}$  organizational type receives, and  $n$  is the total number of organizational types.

This value reflects the spread of members in each coalition across different organizational types. A normalized Shannon's  $H$  of zero indicates that a coalition is composed entirely of members of a single organizational type, while a normalized Shannon's  $H$  of one indicates that a coalition is composed of an equal proportion of members of all organizational types (Boydston, Bevan, and Thomas 2014). To operationalize the *presence* of organizational diversity in coalitions, I then created a binary variable reflecting whether or not each coalition contained a nonzero level of organizational diversity.

Sixth, I developed a measure of *textual similarity between each public comment and its corresponding proposed rule*. Some proportion of language from

<sup>20</sup> Scholars have also evaluated interest groups' financial capacity through lobbying spending, often by way of independent expenditures. However, scholarship on campaign finance has demonstrated that it is the threat of independent expenditures, rather than the expenditures themselves, that drive lobbying influence (Werner and Coleman 2014). Total revenue reflects the scale of *potential* lobbying spending and is thus a more precise and direct measure of organizations' financial capacity.

<sup>21</sup> According to the Policy Agendas Project's common policy coding scheme and determined by reading the summary of each rule.

<sup>22</sup> As with my primary dependent variable, I defined an "intersectionally marginalized population" as any population that included multiply disadvantaged subgroups of marginalized groups. This included any combination of populations marginalized on the basis of gender, race, income, age, sexual orientation or identity, ability, and immigration/citizenship status.

<sup>23</sup> Alternative diversity indices include the nonnormalized Shannon's  $H$  or the Herfindahl index. I selected normalized Shannon's  $H$  over these alternatives due to its greater sensitivity to changes in diversity (Boydston, Bevan, and Thomas 2014).

proposed rules almost certainly remains in their corresponding final rules. Public comments occasionally quote language from the proposed rules they address. They may do so to direct bureaucrats to the sections of the rules they are referencing or as a comparison to the changes they recommend. Importantly, this quoted language may remain in the final rule and thus may contribute to an overestimation of the secondary dependent variable. To address this potential measurement concern, I computed this measure using the same methodology and comparison rules used to measure the secondary dependent variable.

Finally, public comments that contain more text may be more likely to share language with the final rule. I thus recorded the *length* of each public comment, operationalized through the total number of words in each comment after preprocessing. This variable also spans a wide range, from 25 to over 41,000 (mean = 2,258; standard deviation = 4,039).

## SUMMARY STATISTICS AND EMPIRICAL STRATEGY

Of the 475 public comments in the data, 32% were submitted by coalitions. Of these, 14% were submitted by *formal* coalitions—coalitions with names, staff, and fixed organizational memberships.<sup>24</sup> Of all comments, 34% contained intersectional policy advocacy; 44% of comments containing intersectional advocacy were submitted by coalitions. Table 4 presents the number and proportion of comments containing coalitional advocacy, grouped by the policy foci of the members of my sample.

As illustrated, groups focusing on minority/ethnic policy issues engaged in more than 50% of all coalitions observed in the data. Groups addressing the policy interests of Native American tribes were the second most collaborative group type, composing roughly 30% of all coalitions. Groups advocating on behalf of welfare and women's policy issues engaged in coalitional lobbying modestly, together composing roughly 13% of all coalitions.

Table 5 presents the number and proportion of comments containing intersectional advocacy among the members of my sample, similarly grouped by policy focus. As illustrated by Table 5, 52% of comments containing intersectional advocacy were submitted by interest groups representing minority/ethnic policy issues. The second most active commenters in this capacity were groups representing Native American tribes and welfare policy issues, together composing 42% of intersectional comments in the data. Groups representing women's issues engaged in intersectional advocacy the least, at 5%.

<sup>24</sup> For example, Voces Verdes is a formal coalition containing a range of Latinx businesses and organizations committed to sustainable environmental advocacy.

**TABLE 4. Comments in Coalitions by Groups' Policy Focus**

Policy focus	Frequency	Percentage
Minority/ethnic groups	87	57.62
Native American tribes	44	29.14
Welfare	13	8.61
Women's issues	7	4.63
Total	151	100%

**TABLE 5. Intersectional Advocacy by Groups' Policy Focus**

Policy focus	Frequency	Percentage
Minority/ethnic groups	84	52.50
Native American tribes	42	26.25
Welfare	26	16.25
Women's issues	8	5.00
Total	160	100%

Table 6, below, presents summary statistics for each of the key variables.<sup>25-26</sup> Here, it is important to note two aspects of the data. As evidenced by Table 6, the number of observations for the lobbying influence-related variables is smaller than the number of observations in the broader dataset. This pattern reflects a key aspect of the nature of bureaucratic policy making in that not all public comments in the data correspond to a published final rule (required for the measurement of the secondary dependent variable and corresponding control variables). The notice-and-comment process can take years to resolve, and in some cases proposed rules may be dropped at the agency's discretion (Potter 2019). The data appearing in analyses containing these variables are limited by this characteristic.

Additionally, data on organizational diversity were not collected and coded for every coalition observed. To control for the appearance of superficial/symbolic coalitions, which typically contain hundreds of members, I collected and coded this variable only for coalitions containing fewer than 51 members.<sup>27</sup> The data

<sup>25</sup> Due to the wide variance characterizing lobbying influence, coalition size, proposed rule salience, proposed rule-comment similarity, and comment length, their natural log(s) were adopted in the models described below.

<sup>26</sup> Importantly, because the lobbying influence and proposed rule-comment similarity variables contain observations with values of 0, simply taking their natural log would result in undefined observations. Thus, an  $\ln(x + 1)$  transformation was applied to these variables before including them in the model. Appendix F of the Supplementary Materials contains a table with these same statistics for the original forms of these variables.

<sup>27</sup> The vast majority of coalitions in the dataset contained less than 51 members—of the 151 coalitions observed, 115 were submitted by coalitions with less than 51 members (76%).

**TABLE 6. Summary Statistics, Key Variables**

Variable	Mean	Min.	Max.	Std. Dev.	Obs.
Lobbying influence*	2.66	0	6.61	1.88	209
Financial capacity*	12.12	8.27	19.03	2.77	475
Coalition size*	0.90	0	5.99	1.58	475
Proposed rule salience*	5.85	0	14.80	2.88	475
Proposed rule complexity	1.51	1	7	0.96	475
Proposed rule–comment similarity*	2.95	0	7.64	1.80	209
Organizational diversity**	0.04	0	0.64	0.11	115
Comment length*	7.11	3.21	10.62	1.01	475

Note: \*Logged transformation of original variable; \*\*Normalized Shannon's  $H$  operationalization.

appearing in analyses containing this variable are thus also limited by this characteristic. For reference, the subset of all comments submitted by coalitions containing less than 51 members, on which a final rule was issued, composes 15% of all observations in the data, or 71 observations.

## Models

I tested *Hypothesis 1*—the proposition that intersectional interest group advocacy is more likely to occur in coalitions—by applying a logistic regression model with an indicator for the presence of intersectional advocacy within public comments as the dependent variable and the occurrence of a lobbying coalition as the main independent variable. I controlled for financial capacity, coalition size, the salience and complexity of the original proposed rule, and the presence of an interest group with an intersectional mission among the original sample. I additionally accounted for potential correlations within the data by clustering the standard errors. The relationships of interest can be expressed by the following equation:

$$\ln \left[ \frac{\pi_i}{1-\pi_i} \right] = \alpha + \beta_1 \text{Coalition}_i + \beta_2 \text{FinancialCapacity}_i + \beta_3 \text{CoalitionSize}_i + \beta_4 \text{ProposedRuleSalience}_i + \beta_5 \text{ProposedRuleComplexity}_i + \beta_6 \text{IntersectionalMission}_i. \quad (1)$$

I tested *Hypothesis 2*—the proposition that intersectional interest group advocacy is more influential when pursued in coalitions—by applying an Ordinary Least Squares (OLS) linear regression model with a measure of the lobbying influence of comments containing intersectional advocacy (textual similarity between public comment and final rule documents) as the dependent variable and the occurrence of a lobbying coalition as the main independent variable. I controlled for coalition diversity, financial capacity, coalition size, the salience and complexity of the original proposed rule, textual similarity between proposed rule and public comment documents, and public

comment length.<sup>28</sup> I again accounted for potential correlations within the data by clustering the standard errors. The relationships of interest can be expressed by the following equation:

$$\begin{aligned} \text{IntersectionalLobbyingInfluence} = & \alpha + \beta_1 \text{Coalition}_i \\ & + \beta_2 \text{OrganizationalDiversity}_i \\ & + \beta_3 \text{FinancialCapacity}_i \\ & + \beta_4 \text{CoalitionSize}_i \\ & + \beta_5 \text{ProposedRuleSalience}_i \\ & + \beta_6 \text{ProposedRuleComplexity}_i \\ & + \beta_7 \text{ProposedRuleSimilarity}_i \\ & + \beta_8 \text{CommentLength}_i + \varepsilon_i. \end{aligned} \quad (2)$$

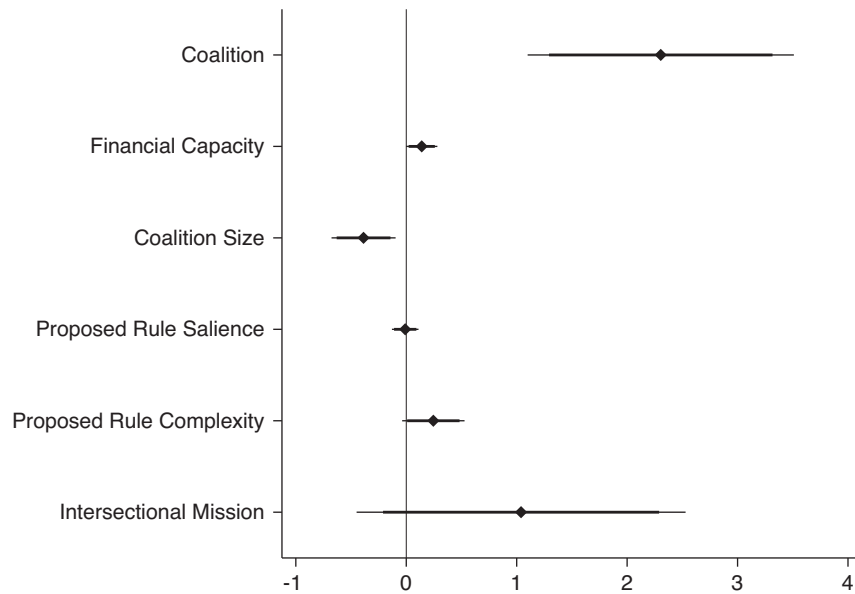
## RESULTS

Figure 2, below, presents the results of Model 1.<sup>29,30</sup> This model assesses whether intersectional advocacy is more likely to occur in coalitions. It illustrates a number of findings: First, there is a positive and significant relationship between the occurrence of a lobbying coalition and the presence of intersectional advocacy in public comments, suggesting that interest groups representing the marginalized are more likely to pursue intersectional advocacy when lobbying collaboratively. More specifically, holding all other variables at their means, the model results indicate that the shift from the absence of a lobbying coalition to the occurrence of a lobbying coalition nearly triples the predicted

<sup>28</sup> It is important to note that the dependent variable in this model is not continuous (as traditionally required for OLS), but bounded at 0. Thus, the optimal model would rely on maximum likelihood estimation (MLE) in the form of a gamma regression model with a log-link function. However, existing work cautions against the use of MLE with small samples, as the small-sample behavior of ML estimators is largely unknown (Long 1997). See Appendix G of the Supplementary Materials for a detailed justification of my choice and various robustness checks employed.

<sup>29</sup> Refer to Appendix H of the Supplementary Materials for the corresponding regression table.

<sup>30</sup> Due to the high prevalence of Native tribes in my sample, I also estimated Model 1 excluding observations by Native tribes. The results of this reestimation, available in Appendix I of the Supplementary Materials, demonstrate support for Hypothesis 1.

**FIGURE 2. Intersectional Advocacy and Coalitional Lobbying—Model 1**

Note: Logistic regression model with group-clustered standard errors.  $N = 471$ . Diamonds indicate coefficient values. Thick lines indicate 90% confidence intervals. Thin lines indicate 95% confidence intervals.

probability of intersectional advocacy, moving from 0.18 to 0.69. This strongly supports the hypothesized notion that interest group advocates for the marginalized strategically coalesce to pursue intersectional advocacy (see *Hypothesis 1*).

Second, there is a positive and significant relationship between the financial capacity of an interest group, or that of a coalition of interest groups, and the presence of intersectional advocacy in public comments, suggesting that resources moderate groups' choices to pursue intersectional advocacy. More specifically, holding all other variables at their means, the model results indicate that, for example, an increase in financial capacity from the twenty-fifth to the seventy-fifth percentile yields an increase in the predicted probability of intersectional advocacy from 0.27 to 0.41. This finding is intuitive and consistent with the existing literature's position on the role of financial resources in strategic lobbying (Baumgartner et al. 2009; Nelson and Yackee 2012; Strolovitch 2007).

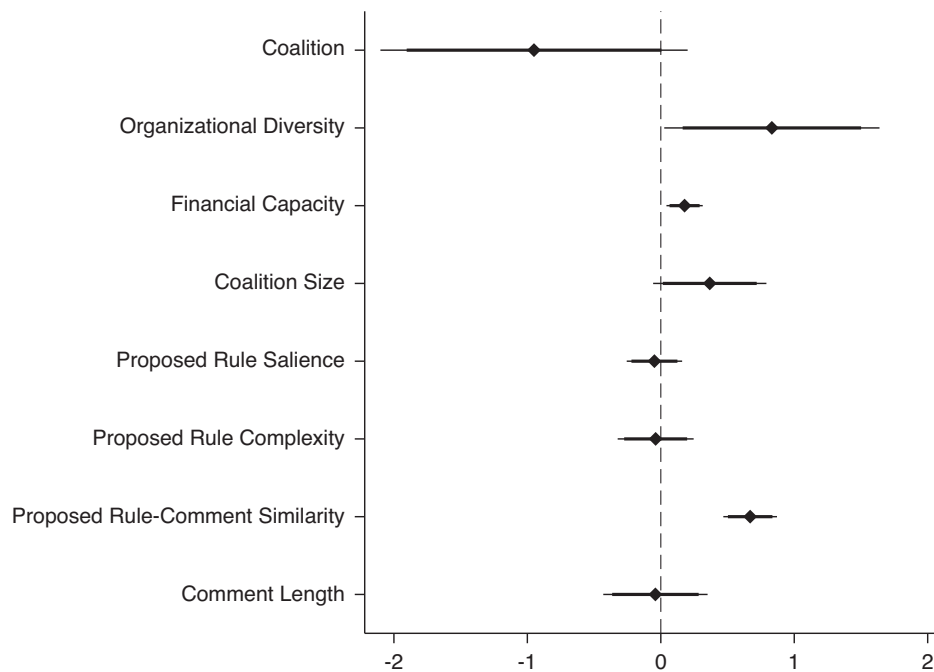
There are also a number of significant and expected directional relationships among the remaining control variables. Intersectional advocacy is significantly more likely when pursued by smaller coalitions and when policy complexity is high. These relationships are reasonable—smaller coalitions are uniquely well equipped to address cross-cutting (i.e., intersectional) issues due to their wider informational and resource capacities and more limited opportunities for internal conflict. Additionally, policy complexity should, to some degree, condition the occurrence of intersectional advocacy. More complex policy issues are more likely to be intersectional in nature, as they often span multiple constituencies and policy domains. Finally, there is

a negative, albeit nonsignificant, relationship between policy salience and intersectional advocacy; there is also a positive and similarly nonsignificant relationship between the presence of a group with an intersectional mission and intersectional advocacy. These intuitive and theoretically motivated findings should lend confidence in the robustness of this model.

Figure 3, below, presents the results of Model 2.<sup>31,32</sup> This model assesses whether intersectional advocacy is more influential when pursued in coalitions. The model results present a number of findings. First, there is no relationship between the occurrence of coalitional lobbying and the influence of intersectional advocacy. This finding lends no support to *Hypothesis 2*, which is at first puzzling. As discussed and illustrated in earlier sections, interest group advocates for the marginalized have increasingly relied on collaborative lobbying over time and pursue intersectional advocacy in coalitions at

<sup>31</sup> Refer to Appendix J of the Supplementary Materials for the corresponding regression table.

<sup>32</sup> I am unable to produce a reestimation of Model 2 excluding observations by Native tribes (as provided for Model 1) due to its more limited sample size ( $N = 71$ ) and concerns for statistical power; in lieu of this reestimation, I have produced a means comparison of intersectional lobbying influence (the dependent variable of the model) across the data appearing in Model 2 inclusive and exclusive of Native tribes. This comparison, along with a density plot of the dependent variable respective to each dataset, is available in Appendix K of the Supplementary Materials. These descriptive statistics demonstrate that the dependent variable's values are not substantially different across the data inclusive and exclusive of Native tribes and thus convey no reason to suspect that the model's results would be substantially different if tribes were excluded.

**FIGURE 3. Intersectional Advocacy and Lobbying Influence—Model 2**

Note: OLS linear regression model with group-clustered standard errors.  $N = 71$ . Diamonds indicate coefficient values. Thick lines indicate 90% confidence intervals. Thin lines indicate 95% confidence intervals.

a high rate. Moreover, coalitional lobbying is a costly endeavor, particularly in the bureaucratic context.

I pose several explanations for this finding. First, interest group representatives for the marginalized may not purely seek to gain policy influence through their coalitional advocacy. They may instead strategically coalesce to position-take, credit-claim, support allies, or otherwise build and maintain their organizational networks. In this case, their public comments may not contain the high informational content required for influence in the bureaucratic context. As some evidence, consider the difference in the length of public comments submitted by the interest groups considered in this article versus those by a sample of “mainstream” interest groups analyzed by Dwidar (2021), who uses an identical measurement of comment length and observes that the formation of interest group coalitions positively and significantly relates to lobbying influence. On average, public comments submitted by the interest groups considered in this article were 40% shorter than those submitted by their “mainstream” counterparts. Future work, however, should probe this finding further.

Second, it may also be the case that the interest group system continues to exacerbate, rather than ameliorate, political inequalities. Writing in 1960, Schattschneider famously termed the “mobilization of bias,” the mechanism by which the concerns of weaker groups were “organized out” of politics by elites who manipulated the agenda to bend toward their own interests. He estimated that 90% of the population could not access

this “pressure group” system. In this context, opponents of interest group representatives for the marginalized in bureaucratic policy debates may be more influential and thus experience policy success at the expense of intersectional interests regardless of their strategic advocacy efforts.

Finally, intersectional policy issues are often inherently more complex than their nonintersectional counterparts, as they seek to address the interests of multiply disadvantaged subgroups of broader populations. As such, these issues require more specific, and more carefully justified, policy solutions. Proposals posing such solutions, if they are to be successful, must express strong and evidence-based arguments—an expensive and arduous task, particularly in the rule-making context (Dwidar 2021; Haeder and Yackee 2015). Expert knowledge, data, and scholarship are often included in these recommendations, and lawyers are regularly employed to compose the appropriate legal language. The development of these proposals may be significantly more challenging for organizations facing social, political, and financial limitations (which those representing marginalized communities, the subject of this study, systematically face), and the formation of a coalition, alone, may not be sufficient to remedy these disparities. This context may also explain the surprising primary finding of the model.

Secondarily, there is a positive and significant relationship between the presence of organizational diversity within coalitions and the influence of intersectional

advocacy. This finding suggests that diverse coalitions are more influential intersectional advocates. Holding all other independent variables at their means, these results indicate that a shift from no organizational diversity to some organizational diversity in coalitions more than doubles the shared word count in perfectly matching phrases between comment and final rule documents (from 33 to 75 words). This 42-word shift may translate to roughly four additional shared sentences between documents, assuming an average sentence length of 10 to 15 words. This effect size is both statistically and substantively significant, as final rules are highly technical in language and any changes in wording (however slight) can profoundly affect their implementation. This finding is particularly significant, too, as it supports the earlier suggestion that the formation of a coalition, alone, is not sufficient for influential intersectional advocacy, a form of advocacy that often requires expansive and expensive tools that the subjects of this study systematically lack. This finding therefore suggests that the formation of *diverse* coalitions—which bring to bear multitudes of perspectives, informational sources, and networks—may ameliorate these organizational disparities.

In addition, this finding of the influence of organizational diversity is one that is supported by the existing literature. Scholars have argued that organizational diversity within coalitions is likely to produce stronger policy proposals (as a function of their pooled monetary, tactical, and informational resources) as well as signal consensus within the broader policy subsystem (as organizations do not enter diverse coalitions lightly, since these efforts require the support of their wide-ranging memberships and political affiliates; Dwidar 2021; Lorenz 2019). Together, these characteristics serve as signals of credibility to bureaucrats incentivized to favor informed and broadly supported policy proposals (Dwidar 2021; Nelson and Yackee 2012).

The model results also indicate that financial capacity is positively and significantly related to the dependent variable, while policy salience is negatively and insignificantly related to the dependent variable. These relationships are similar to those observed in Model 1. Finally, the model results indicate a positive and significant relationship between coalition size and the influence of intersectional advocacy (suggesting, sensibly, that larger coalitions are more influential intersectional advocates—likely due to their ability to signal public attention among stakeholders and constituents, which may compel bureaucrats to more carefully review and consider the content of their comments) and a negative and insignificant relationship between policy complexity and the dependent variable (suggesting that complex policy contexts have no impact on the influence of intersectional advocacy).

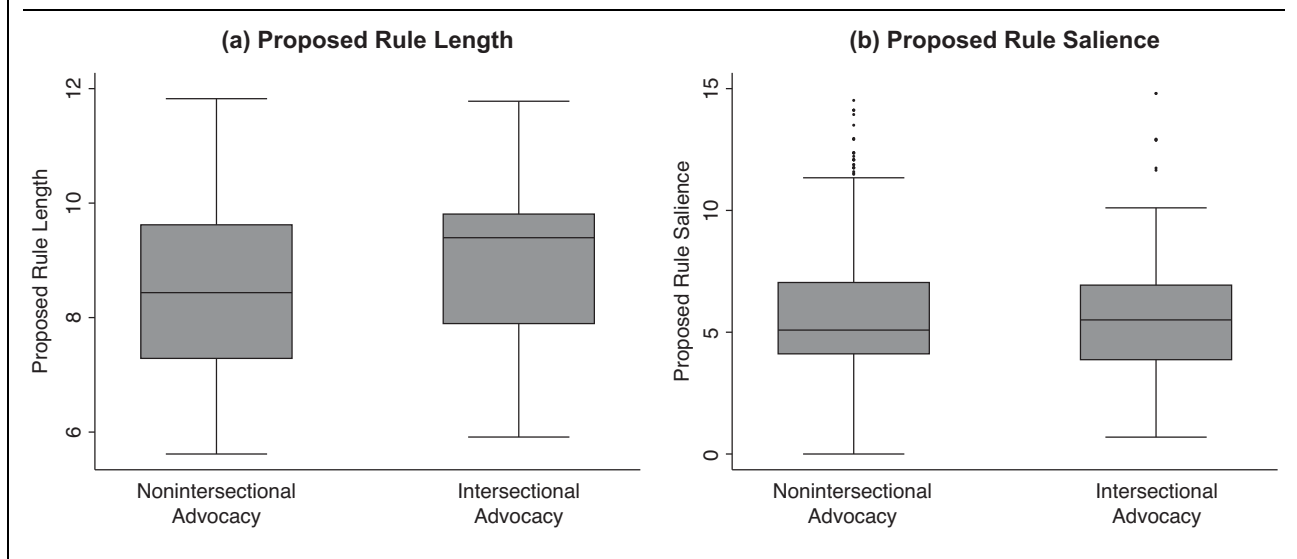
Notably, while the signs and significance of these latter two variables (coalition size, policy complexity) are different from those present in Model 1, they are nonetheless intuitive. In particular, it is sensible to expect coalition size to bear a different directional influence across the two models. Model 1 expresses the relationship between the occurrence of

intersectional advocacy and coalition size, where smaller coalitions should be more likely to pursue such advocacy due to decreased opportunities for internal conflict (common in both coalition work and the promotion of intersectional interests) by way of their size. Model 2, alternatively, expresses the relationship between the influence of intersectional advocacy and coalition size, where larger coalitions should be more likely to bear influence due their enhanced informational and resource capacity. Further, as articulated above, while there are strong intuitive expectations for the relationship between the occurrence of intersectional advocacy and policy complexity (Model 1), there are no such expectations for the relationship between the influence of intersectional advocacy and policy complexity (Model 2).

## ROBUSTNESS CHECKS AND ALTERNATIVE EXPLANATIONS

Finally, it is important to consider a number of alternative explanations for the findings presented above. Most prominently, the occurrence of intersectional advocacy and coalition diversity may be moderated by political or policy context. Both intersectional advocacy and coalition diversity may be more likely to occur in response to proposed regulations with lesser or greater capacities for change, respectively. Perhaps, then, this dynamic may explain the conditions of influence observed in the previous section. Scholars of bureaucratic politics have long pursued this question of whether, and to what degree, agencies and bureaucrats enter the rulemaking process with certain interests, including whether they intend to insulate proposed rulemakings from potential changes. This literature has established that while agencies and bureaucrats can, and do, work to insulate their policy proposals from executive, congressional, and judicial interference, they are incentivized *not* to disregard suggestions made by public participants in notice-and-comment rulemaking (Chubb 1983; Magat, Krupnick, and Harrington 1986; Potter 2019; Seidenfeld 1997; West 1984).

The reason for this incentive structure is logical. As described previously, all agency rules are subject to judicial review, both to ensure that they follow their legislative mandates and adhere to their procedural requirements. In executing judicial reviews of agency rules, federal courts have directed agencies to keep a meaningful written record (encompassing proposed and final rules, public comments, and relevant studies or data) of their decision-making process and to enhance their responsiveness to public participants in rulemaking (Magat, Krupnick, and Harrington 1986; Seidenfeld 1997). Furthermore, federal courts have historically and explicitly encouraged agencies to be more responsive to groups and citizens who express opinions during the notice-and-comment process. This threat of judicial review, as well as judicial reliance on the written record, has provided strong motivations for agencies to interact actively with the notice-and-comment process (Chubb

**FIGURE 4. Intersectional Advocacy and Proposed Rule Characteristics**

1983; West 1984). In other words, while agencies are not required to make changes between proposed and final rules, they are strongly incentivized to approach rule-making with an open mind and to engage in good faith with proposals made by public comments (Potter 2019; Yackee 2006).

Besides assessing historical and scholarly evidence, it is possible to probe several empirical implications of this alternative explanation. If intersectional advocacy largely occurs in response to proposed rulemakings with less capacity for change, then we should observe differences between the characteristics of proposed regulations that attracted intersectional advocacy and those that did not. Figures 4a and 4b depict summary distributions of proposed regulation length and salience over the occurrence of intersectional advocacy in public comments.<sup>33</sup> These variables capture the degree of detail within and public attention to each proposed rule in the data. As such, they are adequate indicators of regulatory capacity for change. The distributions reflect no obvious differences between the levels of detail or salience of proposed rules that intersectional advocacy did and did not occur in response to.

An additional alternative explanation is that organizationally diverse coalitions may form in response to proposed rulemakings with greater capacity for change. Interest groups are well-informed actors who are likely to be aware of the conditions under which agencies may be more willing to consider outside proposals. If organizations are more likely to form diverse coalitions around more malleable rules, then we should similarly observe differences between the characteristics of pro-

posed regulations that attracted diverse lobbying efforts and those that did not. However, we do not. Figures 5a and 5b, below, depict summary distributions of proposed regulation length and salience over the occurrence of organizationally diverse coalitions in public comment submission. These figures reflect no obvious differences between the levels of detail or salience of proposed rules that organizationally diverse coalitions did and did not advocate in response to.

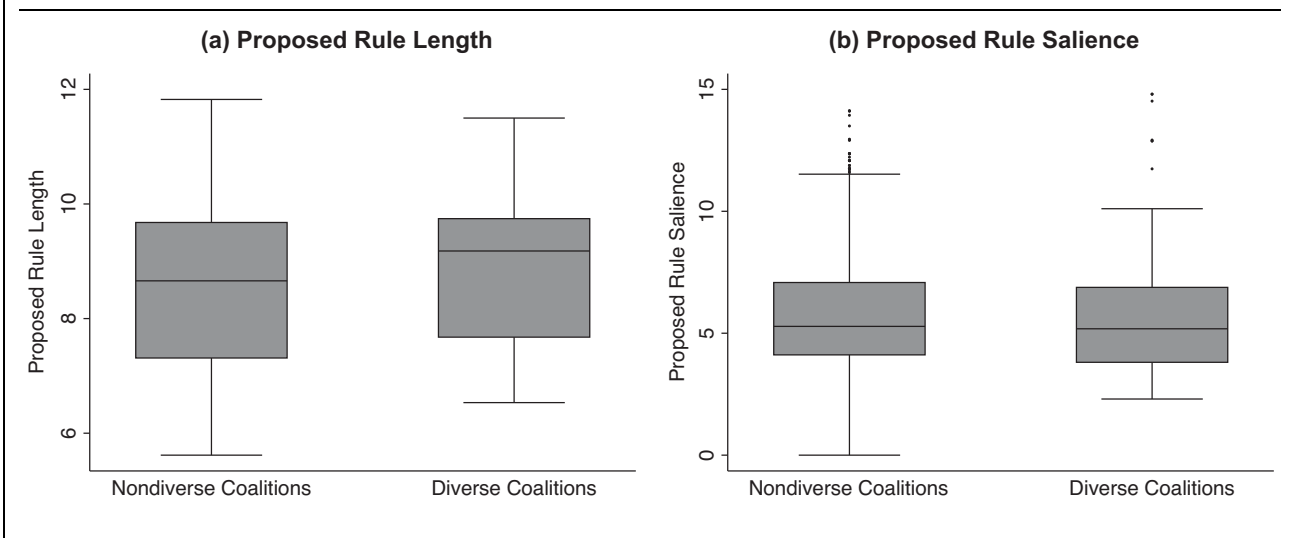
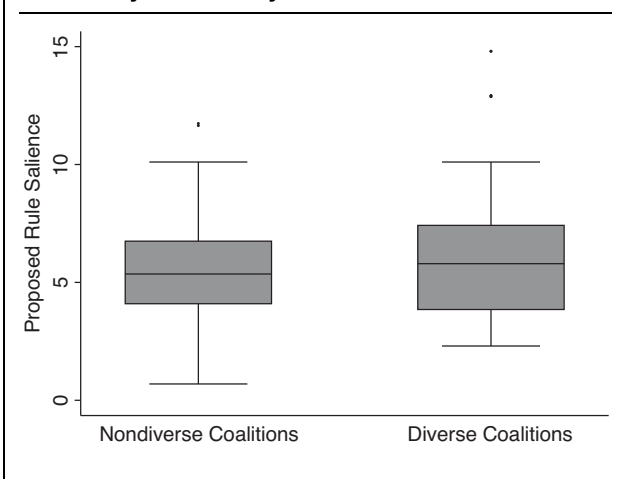
Finally, the reader may question whether diverse coalitions may be more likely to pursue intersectional advocacy when they expect to be influential. For instance, diverse coalitions may form strategically to pursue intersectional advocacy in response to proposed rules with high levels of complexity or salience. As noted previously, proposed rules with high levels of complexity or salience require more complex, or otherwise politically adept, public comments. Sophisticated public comments often draw on a wide range of policy and legal expertise and greater financial and staff resources. In other words, comments on proposed rules that are more complex or salient may be more likely to be influential when produced by a diverse coalition, and we may reasonably expect individual interest groups to be aware of this dynamic.

If it is the case that interest groups strategically form diverse coalitions to pursue intersectional advocacy under conditions of high policy complexity, we should seldom observe diverse coalitions occurring in response to less complex policies. However, we observe the opposite. Among all coalitions considered in Model 2, the vast majority—69%—occurred in response to proposed rules with the lowest possible level of complexity (out of seven) and 27% on the next-highest level.<sup>34</sup>

<sup>33</sup> These figures were produced leveraging the following variables: proposed rule length (natural log), proposed rule salience (natural log), and occurrence of intersectional advocacy. Descriptions of these variable operationalizations are available in earlier sections of this article.

<sup>34</sup> These levels of complexity were measured through the total number of distinct policy subtopics encompassed by each proposed rule. This coding procedure is described in greater detail in earlier sections of this article.



**FIGURE 5. Organizationally Diverse Coalitions and Proposed Rule Characteristics****FIGURE 6. Diverse Coalitions' Intersectional Advocacy and Policy Saliency**

These statistics should ameliorate concerns that diverse coalitions predominantly form in response to more complex rules.

Similarly, if it is the case that groups strategically form diverse coalitions to pursue intersectional advocacy under conditions of high policy saliency, we should seldom observe coalitions occurring in response to less salient policies. However, this expectation is not reflected in the data. As Figure 6 shows, there is no obvious difference between the levels of saliency of proposed rules on which diverse and nondiverse coalitions submit intersectionally oriented comments.

## DISCUSSION

As the federal bureaucracy has grown in size and scope, the contributions of interest groups to its policy making have grown increasingly vital. This advocacy,

particularly by groups that represent marginalized individuals, is essential to informed and representative bureaucratic policy making. While recent work has begun to illuminate the constraints, incentives, and roles of interest group advocates for the marginalized in policy making, this work remains limited. This article contributes to the existing scholarship by considering the conditions under which these groups pursue and achieve intersectional policy change. Representational disparities in advocacy by these groups have significant downstream consequences for the implementation of public policies that do not reproduce identity hierarchies. These disparities—along with strategies for their mediation—should be of paramount importance to both scholars and practitioners.

Overall, I find that interest groups representing women, people of color, Native nations, and the poor are significantly more likely to pursue intersectional advocacy when lobbying collaboratively, but that it is not coalition work, alone, that relates to influential intersectional advocacy. Rather, it is particular coalition characteristics, including organizational diversity and greater financial capacity, that predict such influence. I arrive at these findings using a novel dataset on coalition membership and a measure of the influence of intersectional advocacy leveraging modern text analysis tools.<sup>35</sup>

<sup>35</sup> Importantly, due to the particularities of my measurement approach, my findings do not address cases where a final rule was not issued but where a comment sought to “kill” the rule and thus succeeded in achieving its goal. It is possible that some comments in the corpus successfully urged regulators to shelve the corresponding proposed rules. However, the withdrawal of proposed rules by federal agencies is rare, as they are often slowly and carefully developed over long periods, often with the consultation of outside groups (Potter 2019). This trend is reflected in the data, as less than 1% of proposed rules in the dataset were formally withdrawn. This phenomenon is also one of *negative* lobbying power, where interest groups may advocate for proposed policies to be rescinded entirely. This form of influence is undoubtedly important, though it is both

This article makes a number of contributions. It is among the first pieces of work—along with English 2019a and 2019b—to consider the role of interest group representatives for the marginalized in bureaucratic policy making and the conditions that produce influential intersectional advocacy. While this existing work focuses on advocacy by women’s organizations, I examine a sample of organizations representing women, people of color, Native nations, and the poor. Additionally, by considering the relationship between coalitional strategy and intersectional advocacy and measuring and assessing the influence of such advocacy, I significantly extend the scope of this existing literature. Moreover, my findings pertaining to the conditions under which intersectional advocacy occurs and is effective have important implications for our understanding of representational inequality, wealth, and networks in lobbying, as well as the possibilities of representative democracy more generally. These findings should thus be of practical value to interest group leaders and political organizers.

Additionally, my finding pertaining to organizational diversity in coalitions addresses a long-standing debate over the bureaucracy’s democratic legitimacy. Bureaucratic rulemaking has often been labeled as undemocratic in nature, as it lends unelected and insulated decision makers a great deal of discretion over the policy process. However, if bureaucrats favor the proposals of diverse, or pluralistic, coalitions in this process, their rulemaking thus likely considers and represents the interests of a broader public. This conclusion therefore contributes to a storied literature regarding agency responsiveness to public and stakeholder interests, legitimacy in rulemaking, and representative democracy.

Future work in this area should explore the power dynamics of diverse coalitions; the potential for learning from coalitional experiences; comparative coalitional behavior between “marginalized” and “mainstream” interest groups; and the relationships between advocacy agendas and interest groups’ constituencies, policy histories, and constraints of agencies. For instance, while coalitions with organizational diversity and greater financial capacity may enhance intersectional advocacy efforts, these collaborations certainly come at a cost. What costs and benefits do these collaborations present, and what conditions may incentivize their formation? Additionally, not all coalition partners consider their joint efforts to be positive or successful, as collaboration requires significant compromise. Do interest groups “learn” from their experiences in coalitions by doubling down on or abandoning the strategy in future advocacy? Do interest group advocates for the marginalized collaborate in rulemaking for purposes other than policy influence, such as public position taking or network maintenance? Is coalitional lobbying more influential when addressing entrenched policy issues requiring more technical expertise or when directed at agencies

---

difficult to capture and not possible to measure through the approach deployed in this article (requiring comment–final rule pairs). It is also theoretically beyond the scope of this article, which is concerned with *positive* lobbying power.

experiencing stopgap budgeting? Furthermore, some policy domains remain characterized by a tight subsystem of actors. Are such domains more or less resistant to the efforts of coalitions?

Finally, the concept and practice of intersectionality have gained salience in recent years in both popular and organizing circles (Coaston 2019). Organizational leaders have begun facing greater public pressure to contend with both the intersecting identities of their constituents and the historic and systemic neglect of their needs (Strolovitch 2018). While some organizations have effectively responded to these pressures (as documented by the increase in exclusively intersectional social and economic justice organizations—see Strolovitch 2018), others have been decried for the disparity between their public claims to support intersectional work and their lack of substantive intersectional advocacy (see Kitchener 2020; Shugerman 2020). However, scholars have yet to systematically assess the effects of this important trend on organizations’ advocacy choices. This relationship—between public and organizational attention to intersectionality—is also worthy of future study.

## SUPPLEMENTARY MATERIALS

To view supplementary material for this article, please visit <http://dx.doi.org/10.1017/S0003055421000794>.

## DATA AVAILABILITY STATEMENT

Research documentation and data that support the findings of this study are openly available in the American Political Science Review Dataverse at <https://doi.org/10.7910/DVN/TNXRNM>.

## ACKNOWLEDGMENTS

The author thanks Bryan Jones, Beth Leech, Eric McDaniel, Dara Strolovitch, Christopher Wlezien, E. J. Fagan, Iasmin Goes, Robert Shaffer, Jonathan Lewallen, and the editors and three anonymous reviewers of the American Political Science Review for their helpful comments. The author additionally thanks Lindsey Asis, Natalee Ball, Hannah Bevers, Catherine Blair, Travis Clark, John Flattery, Holly McDonald, Sydney Mike-Mayer, Tarika Nath, Emily Nguyen, and Stephanie Ward for their exceptional research assistance.

## FUNDING STATEMENT

This research was funded by the J.J. “Jake” Pickle Regents Chair in Congressional Studies at the University of Texas at Austin, the Irma Rangel Public Policy Institute, and the Annette Strauss Institute for Civic Life.

## CONFLICT OF INTEREST

The author declares no ethical issues or conflicts of interest in this research.

## ETHICAL STANDARDS

The author affirms this research did not involve human subjects.

## REFERENCES

- Baumgartner, Frank R., and Beth L. Leech. 1998. *Basic Interests: The Importance of Groups in Politics and in Political Science*. Princeton, NJ: Princeton University Press.
- Baumgartner, Frank R., Christian Breunig, Christoffer Green-Pedersen, Bryan D. Jones, Peter B. Mortensen, Michiel Nuytemans, and Stefaan Walgrave. 2009. "Punctuated Equilibrium in Comparative Perspective." *American Journal of Political Science* 53 (3): 603–20.
- Baumgartner, Frank R., Jeffrey M. Berry, Marie Hojnacki, Beth L. Leech, and David C. Kimball. 2009. *Lobbying and Policy Change: Who Wins, Who Loses, and Why*. Chicago: University of Chicago Press.
- Berry, Jeffrey M. 1989. *The Interest Group Society*. Northbrook, IL: Scott Foresman and Company.
- Berry, Jeffrey M., and David F. Arons. 2005. *A Voice for Nonprofits*. Washington, DC: Brookings Institution Press.
- Boehmke, Frederick, and Richard Witmer. 2012. "Indian Nations as Interest Groups: Tribal Motivations for Contributions to U.S. Senators." *Political Research Quarterly* 65 (1): 179–91.
- Boydston, Amber E., Shaun Bevan, and Herschel F. Thomas. 2014. "The Importance of Attention Diversity and How to Measure It." *Policy Studies Journal* 42 (2): 173–96.
- Brady, Henry E., Sidney Verba, and Kay Lehman Schlozman. 1995. "Beyond SES: A Resource Model of Political Participation." *American Political Science Review* 89 (2): 271–94.
- Brown, Melissa, Rashawn Ray, Ed Summers, and Neil Fraistat. 2017. "#SayHerName: A Case Study of Intersectional Social Media Activism." *Ethnic and Racial Studies* 40 (11): 1831–46.
- Carpenter, Daniel P. 2002. "Groups, the Media, Agency Waiting Costs, and FDA Drug Approval." *American Journal of Political Science* 46 (3): 490–505.
- Chubb, John E. 1983. *Interest Groups and the Bureaucracy: The Politics of Energy*. Red Oaks, CA: Stanford University Press.
- Clough, Paul, and Mark Stevenson. 2011. "Developing a Corpus of Plagiarised Short Answers." *Language Resources and Evaluation* 45 (1): 5–24.
- Coaston, Jane. 2019. "The Intersectionality Wars." *Vox*. March 20, (updated May 28, 2019). <https://www.vox.com/the-highlight/2019/5/20/18542843/intersectionality-conservatism-law-race-gender-discrimination>.
- Collective, Combahee River. 1977. *Combahee River Collective Statement*. <https://www.blackpast.org/african-american-history/combahee-river-collective-statement-1977/>.
- Corntassel, Jeff, and Richard Witmer. 2008. *Forced Federalism: Contemporary Challenges to Indigenous Nationhood*. Norman: University of Oklahoma Press.
- Crenshaw, Kimberlé. 1991. "Mapping the Margins: Intersectionality, Identity Politics, and Violence against Women of Color." *Stanford Law Review* 43 (6): 1241–99.
- Croley, Steven P. 1998. "Theories of Regulation: Incorporating the Administrative Process." *Columbia Law Review* 98 (1), 1–168.
- Cropper, Maureen L., William N. Evans, Stephen J. Berardi, Maria M. Duclasoares, and Paul R. Portney. 1992. "The Determinants of Pesticide Regulation: A Statistical Analysis of EPA Decision Making." *Journal of Political Economy* 100 (1): 175–97.
- Dür, Andreas, and Dirk De Bièvre. 2007. "The Question of Interest Group Influence." *Journal of Public Policy* 27 (1): 1–12.
- Dwidar, Maraam A. 2021. "Diverse Lobbying Coalitions and Influence in Notice-and-Comment Rulemaking." *Policy Studies Journal* (early view). <https://doi.org/10.1111/psj.12431>.
- Dwidar, Maraam A. 2021. "Replication Data for: Coalitional Lobbying and Intersectional Representation in American Rulemaking." Harvard Dataverse. Dataset. at <https://doi.org/10.7910/DVN/TNXRNM>.
- English, Ashley. 2019a. "She Who Shall Not Be Named: The Women That Women's Organizations Do (and Do Not) Represent in the Rulemaking Process." *Politics & Gender* 15 (3): 572–98.
- English, Ashley. 2019b. "Implementing Intersectionality: Women's Organizations' Representation of Women of Color and Poor Women During Two Rulemakings." *Politics, Groups, and Identities*. doi: 10.1080/21565503.2019.1674161.
- English, Ashley. 2020. "Where Are All the Single Ladies? Marital Status and Women's Organizations' Rule-making Campaigns." *Politics & Gender* 16 (2): 581–607.
- Epstein, David, and Sharyn O'Halloran. 1996. "Divided Government and the Design of Administrative Procedures: A Formal Model and Empirical Test." *Journal of Politics* 58 (2): 373–97.
- Epstein, David, and Sharyn O'Halloran. 1999. *Delegating Powers: A Transaction-Cost Approach to Policymaking under Separate Powers*. New York: Cambridge University Press.
- Gershon, Sarah A., Celeste Montoya, Christina Bejarano, and Nadia Brown. 2019. "Intersectional Linked Fate and Political Representation." *Politics, Groups, and Identities* 7 (3): 642–53.
- Gilens, Martin. 2004. *Affluence and Influence: Economic Inequality and Political Power in America*. Princeton, NJ: Princeton University Press.
- Gilens, Martin, and Benjamin I. Page. 2014. "Testing Theories of American Politics: Elites, Interest Groups, and Average Citizens." *Perspectives on Politics* 12 (3): 564–81.
- Golden, Marissa Martino. 1998. "Interest Groups in the Rule-Making Process: Who Participates? Whose Voices Get Heard?" *Journal of Public Administration Research and Theory* 8 (2): 245–70.
- Gray, Virginia, and David Lowery. 1998. "To Lobby Alone or in a Flock: Foraging Behavior Among Organized Interests." *American Politics Quarterly* 26 (1): 5–34.
- Grimmer, Justin, and Brandon M. Stewart. 2013. "Text As Data: The Promise and Pitfalls of Automatic Content Analysis Methods for Political Texts." *Political Analysis* 21 (3): 267–97.
- Haeder, Simon F., and Susan Webb Yackee. 2015. "Influence and the Administrative Process: Lobbying the U.S. President's Office of Management and Budget." *American Political Science Review* 109 (3): 507–22.
- Haider-Markel, Donald P. 2006. "Acting as Fire Alarms with Law Enforcement? Interest Groups and Bureaucratic Activity on Hate Crime." *American Politics Research* 34 (1): 95–130.
- Han, Hahrie, Elizabeth McKenna, and Michelle Oyakawa. 2020. *Prisms of the People: Power and Organizing in Twenty-First Century America*. Chicago: University of Chicago Press.
- Heaney, Michael T. 2004. "Issue Networks, Information, and Interest Group Alliances: The Case of Wisconsin Welfare Politics, 1993–99." *State Politics and Policy Quarterly* 4 (3): 237–70.
- Heinz, John P., Edward O. Laumann, Robert L. Nelson, and Robert H. Salisbury. 1993. *The Hollow Core: Private Interests in National Policy Making*. Cambridge, MA: Harvard University Press.
- Hojnacki, Marie. 1997. "Interest Groups' Decisions to Join Alliances or Work Alone." *American Journal of Political Science* 41 (1): 61–87.
- Hrebener, Ronald J. 1997. *Interest Group Politics in America*. Armonk, NY: M. E. Sharpe.
- Hula, Kevin. 1999. *Lobbying Together: Interest Group Coalitions in Legislative Politics*. Washington, DC: Georgetown University Press.
- Imig, Douglas R. 1996. *Poverty and Power: The Political Representation of Poor Americans*. Lincoln: University of Nebraska Press.
- Jones, Bryan D., Sean M. Theriault, and Michelle Whyman. 2019. *The Great Broadening: How the Vast Expansion of the Policymaking Agenda Transformed American Politics*. Chicago: University of Chicago Press.
- Junk, Wiebke Marie. 2019. "When Diversity Works: The Effects of Coalition Composition on the Success of Lobbying Coalitions." *American Journal of Political Science* 63 (3): 660–74.

- Kastellec, Jonathan P. 2013. "Racial Diversity and Judicial Influence on Appellate Courts." *American Journal of Political Science* 57 (1): 167–83.
- Kerwin, Cornelius, Scott R. Furlong, and William West. 2011. "Interest Groups, Rulemaking, and American Bureaucracy." In *The Oxford Handbook of American Bureaucracy*, ed. Robert F. Durant, 590–611. New York: Oxford University Press.
- Kerwin, Cornelius M. 2003. *Rulemaking: How Government Agencies Write Law and Make Policy*. Washington, DC: Congressional Quarterly Press.
- Kitchener, Caroline. 2020. "'How Many Women of Color Have to Cry?': Top Feminist Organizations Are Plagued by Racism, 20 Former Staffers Say." *The Lily*, July 13.
- Klüver, Heike. 2009. "Measuring Interest Group Influence Using Quantitative Text Analysis." *European Union Politics* 10 (4): 535–49.
- Kroeger, Mary. 2016. "Plagiarizing Policy: Model Legislation in State Legislatures." Working Paper.
- Laperrière, Marie, and Éléonore Lépinard. 2016. "Intersectionality as a Tool for Social Movements: Strategies of Inclusion and Representation in the Québécois Women's Movement." *Politics* 36 (4): 374–82.
- Laumann, Edward O., and David Knoke. 1987. *The Organizational State: Social Choice in National Policy Domains*. Madison: The University of Wisconsin Press.
- Lewallen, Jonathan. 2020. *Committees and the Decline of Lawmaking in Congress*. Ann Arbor: University of Michigan Press.
- Long, J. Scott. 1997. *Regression Models for Categorical and Limited Dependent Variables*. Thousand Oaks, CA: Sage Publishing.
- Lorenz, Geoff. 2019. "Prioritized Interests: Diverse Interest Group Coalitions and Congressional Committee Agenda-Setting." *Journal of Politics* 82 (1): 225–40.
- Lyon, Caroline, James Malcolm, and Bob Dickerson. 2001. "Detecting Short Passages of Similar Text in Large Document Collections." Proceedings of the 2001 Conference on Empirical Methods in Natural Language Processing, Pittsburgh, PA.
- Magat, Wesley A., Alan J. Krupnick, and Winston Harrington. 1986. *Rules in the Making*. Washington, DC: RFF Press.
- Mahoney, Christine. 2007. "Networking vs. Allying: The Decision of Interest Groups to Join Coalitions in the US and EU." *Journal of European Public Policy* 14 (3): 366–83.
- Mahoney, Christine, and Frank R. Baumgartner. 2004. "The Determinants and Effects of Interest-Group Coalitions" Working Paper.
- Marchetti, Kathleen. 2014. "Crossing the Intersection: The Representation of Disadvantaged Identities in Advocacy." *Politics, Groups, and Identities* 2 (1): 104–19.
- Marquez, Benjamin. 2003. *LULAC: The Evolution of a Mexican American Political Organization*. Austin: University of Texas Press.
- Martinez, Dierdre. 2009. *Who Speaks for Hispanics? Hispanic Interest Groups in Washington*. Albany: State University of New York Press.
- Mason, Dale W. 1998. "Tribes and States: A New Era in Intergovernmental Affairs." *Publius* 28 (1): 111–30.
- Mason, Dale W. 2000. *Indian Gaming*. Norman: University of Oklahoma Press.
- Mayhew, David R. 1974. *Congress: The Electoral Connection*. New Haven, CT: Yale University Press.
- McConaughy, Corrine M. 2013. *The Woman Suffrage Movement in America: A Reassessment*. New York: Cambridge University Press.
- McCubbins, Matthew D., Roger G. Noll, and Barry R. Weingast. 1987. "Administrative Procedures as Instruments of Political Control." *Journal of Law, Economics, and Organization* 3: 243–77.
- McCubbins, Matthew D., Roger G. Noll, and Barry R. Weingast. 1989. "Structure and Process as Solutions to the Politician's Principal Agency Problem." *Virginia Law Review* 74: 431–82.
- McCubbins, Mathew D., and Thomas Schwartz. 1984. "Congressional Oversight Overlooked: Police Patrols versus Fire Alarms." *American Journal of Political Science* 28 (1): 165–79.
- McGarity, Thomas O. 1992. "Some Thoughts on 'Deossifying' the Rulemaking Process." *Duke Law Journal* 41 (6): 1385–462.
- McGarity, Thomas O. 1997. "The Courts and the Ossification of Rulemaking: A Response to Professor Seidenfeld." *Texas Law Review* 75 (3): 525–58.
- McKay, Amy, and Susan Webb Yackee. 2007. "Interest Group Competition on Federal Agency Rules." *American Politics Research* 35 (3): 336–57.
- Nelson, David, and Susan Webb Yackee. 2012. "Lobbying Coalitions and Government Policy Change: An Analysis of Federal Agency Rulemaking." *Journal of Politics* 74 (2): 339–53.
- Nixon, David C., Robert M. Howard, and Jeff R. DeWitt. 2002. "With Friends Like These: Rule-Making Comment Submissions to the Securities and Exchange Commission." *Journal of Public Administration Research and Theory* 12 (1): 59–76.
- Nownes, Anthony J. 2007. *Total Lobbying: What Lobbyists Want (and How They Try to Get It)*. New York: Cambridge University Press.
- Pedersen, Helene H. 2013. "Is Measuring Interest Group Influence a Mission Impossible? The Case of Interest Group Influence in the Danish Parliament." *Interest Groups & Advocacy* 2 (1): 26–47.
- Phinney, Robin. 2017. *Strange Bedfellows: Interest Group Coalitions, Diverse Partners, and Influence in American Social Policy*. New York: Cambridge University Press.
- Pinderhughes, Diane. 1995. "Black Interest Groups and the 1982 Extension of the Voting Rights Act." In *Blacks and the American Political System*, eds. Huey L. Perry and Wayne Parent, 203–24. Gainesville: University Press of Florida.
- Porter, Martin F. 1980. "An Algorithm for Suffix Stripping." *Program: Electronic Library and Information Systems* 14 (3): 130–37.
- Potter, Rachel A. 2019. *Bending the Rules: Procedural Politicking in the Bureaucracy*. Chicago: University of Chicago Press.
- Purdie-Vaughns, Valerie, and Richard P. Eibach. 2008. "Intersectional Invisibility: The Distinctive Advantages and Disadvantages of Multiple Subordinate-Group Identities." *Sex Roles* 59 (5–6): 377–91.
- Rabin, Robert L. 1986. "Federal Regulation in Historical Perspective." *Stanford Law Review* 38 (5): 1189–326.
- Redford, Emmette S. 1969. *Democracy in the Administrative State*. Oxford: Oxford University Press.
- Reingold, Beth, Kirsten Widner, and Rachel Harmon. 2019. "Legislating at the Intersections: Race, Gender, and Representation." *Political Research Quarterly* 73 (4): 819–33.
- Rourke, Francis E. 1984. *Bureaucrats, Politics, and Public Policy*. Boston: Little, Brown.
- Schattschneider, E. E. 1960. *The Semi-Sovereign People*. New York: Rinehart & Winston.
- Schlozman, Kay Lehman, and John T. Tierney. 1986. *Organized Interests and American Democracy*. New York: HarperCollins.
- Schlozman, Kay Lehman, Sidney Verba, and Henry E. Brady. 2012. *The Unheavenly Chorus: Unequal Political Voice and the Broken Promise of American Democracy*. Princeton, NJ: Princeton University Press.
- Schneider, Anne, and Helen Ingram. 1993. "Social Construction of Target Populations: Implications for Politics and Policy." *American Political Science Review* 87 (2): 334–47.
- Seidenfeld, Mark. 1997. "Demystifying Deossification: Rethinking Recent Proposals to Modify Judicial Review of Notice and Comment Rulemaking." *Texas Law Review* 41 (6): 1385–462.
- Shapiro, Martin. 1988. *Who Guards the Guardians? Judicial Control of Administration*. Athens: University of Georgia Press.
- Shugerman, Emily. 2020. "'Don't Forget the White Women!': Members Say Racism Ran Rampant at NOW." *The Daily Beast*, June 6.
- Skrentny, John David. 2002. *The Minority Rights Revolution*. Cambridge, MA: Harvard University Press.
- Staggenborg, Suzann. 1986. "Coalition Work in the Pro-Choice Movement: Organizational and Environmental Opportunities and Obstacles." *Social Problems* 33 (5): 374–90.
- Steinman, Erich. 2004. "American Federalism and Intergovernmental Innovation in State-Tribal Relations." *Publius* 34 (1): 95–114.
- Strolovitch, Dara Z. 2006. "Do Interest Groups Represent the Disadvantaged? Advocacy at the Intersections of Race, Class, and Gender." *Journal of Politics* 68 (4): 894–910.
- Strolovitch, Dara Z. 2007. *Affirmative Advocacy: Race, Class, and Gender in Interest Group Politics*. Chicago: University of Chicago Press.
- Strolovitch, Dara Z. 2018. "Intersectional Advocacy and Activism in Time." Paper Presented at the Annual Meeting of the American Political Science Association, Boston.
- Truth, Sojourner. 1851. "Ain't I a Woman?" *Women's Rights Convention*, Akron, Ohio.

- Warren, Kenneth F. 2018. *Administrative Law in the Political System*. London: Routledge.
- Werner, Timothy, and John J. Coleman. 2014. "Citizens United, Independent Expenditures, and Agency Costs: Reexamining the Political Economy of State Antitakeover Statutes." *Journal of Law, Economics, and Organization* 31 (1): 127–59.
- West, William F. 1984. "Structuring Administrative Discretion: The Pursuit of Rationality and Responsiveness." *American Journal of Political Science* 28 (2): 340–60.
- West, William F. 2004. "Formal Procedures, Informal Processes, Accountability, and Responsiveness in Bureaucratic Policy Making: An Institutional Policy Analysis." *Public Administration Review* 64 (1): 66–80.
- Witmer, Richard, and Frederick Boehmke. 2007. "American Indian Political Incorporation in the Post-Indian Gaming Regulatory Act." *Social Science Journal* 44 (1): 127–45.
- Witmer, Richard, Joshua Johnson, and Frederick Boehmke. 2014. "American Indian Policy in the States." *Social Science Quarterly* 95 (4): 1043–63.
- Workman, Samuel. 2015. *The Dynamics of Bureaucracy in the U.S. Government*. New York: Cambridge University Press.
- Yackee, Jason Webb, and Susan Webb Yackee. 2006. "A Bias Towards Business? Assessing Interest Group Influence on the U.S. Bureaucracy." *Journal of Politics* 68 (1): 128–39.
- Yackee, Susan Webb. 2006. "Sweet-Talking the Fourth Branch: The Influence of Interest Group Comments on Federal Agency Rulemaking." *Journal of Public Administration Research and Theory* 16 (1): 103–24.
- Yackee, Susan Webb. 2012. "The Politics of Ex Parte Lobbying: Pre-Proposal Agenda Building and Blocking During Agency Rulemaking." *Journal of Public Administration Research and Theory* 22 (2): 373–93.