

# Supplementary Materials: Coalitional Lobbying and Intersectional Representation in American Rulemaking

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This document provides the Supplementary Materials for *Coalitional Lobbying and Intersectional Representation in American Rulemaking*.

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# Appendices

## A Organizational Type Coding Scheme

I classified each interest group in the sample into one of twelve categories demarcating their organizational type. This classification scheme was informed by the work of Baumgartner et al. (2009) and was developed through several iterations of coding coalition members in a pilot version of this project. I classified coalition members by examining their personal websites and conducting searches for their organizational tax statuses in [ProPublica](#). The scheme consisted of the categories displayed below.

Organizational Type
Trade union
Non-union professional, trade, or industry association
Not-for-profit organization
Business or business group
Advocacy group
Native American tribe or representative of Native American interests
Not-for-profit business league
Government agency
Think tank or foundation
University
Religious organization
Other

## B Interest Groups in Sample

Affordable Housing Centers of America  
Alabama-Coushatta Tribe of Texas  
Alaska Federation of Natives  
American Council on International Personnel  
American Hellenic Institute  
Arctic Slope Native Association  
Asian American Justice Center  
Association of Village Council Presidents  
Blackfeet Tribe  
California Rural Indian Health Board  
California Valley Miwok Tribe  
California WIC Association  
Catawba Indian Nation  
Catholic Charities USA  
Cayuga Nation of New York

Center for Community Change  
Cherokee Nation  
Cheyenne River Sioux Tribe  
Cheyenne-Arapaho Tribes  
Coeur d'Alene Tribe  
Communities In Schools  
Community Training and Assistance Center  
Cook Inlet Tribal Council  
Copper River Native Association  
Council for Global Immigration  
Covenant House International  
Cowlitz Indian Tribe  
Delaware Tribe of Indians  
Duckwater Shoshone Tribe  
Eastern Pequot Tribal Nation  
Eastern Shoshone Tribe  
Federally Employed Women  
Habematolel Pomo of Upper Lake  
Hopi Tribe  
Hualapai Tribe  
Immigration Equality Action Fund  
Immigration Voice  
Institute of American Indian Arts  
Ione Band of Miwok Indians  
Jewish Federations of North America  
Juaneno Band of Mission Indians  
Karuk Tribe Housing Authority  
Kickapoo Traditional Tribe of Texas  
Leadership Conference on Civil Rights  
League of United Latin American Citizens  
Lower Elwha Klallam Tribe  
Lumbee Tribe of North Carolina  
Mandan Hidatsa Arikara Nation  
Maniilaq Association  
Mashpee Wampanoag Tribe  
Matanuska-Susitna Borough  
Match-E-Be-Nash-She-Wish Band  
Mexican American Legal Defense and Education Fund  
Minnesota Chippewa Tribe  
NAACP Legal Defense and Education Fund  
Narragansett Indian Tribe  
National American Indian Housing Council  
National Congress of American Indians  
National Network for Youth  
National Tribal Environmental Council

Navajo Nation Council  
NumbersUSA Action  
Pueblo de Cochiti  
Pueblo of Santa Clara  
Pyramid Lake Paiute Tribe  
Rocky Mountain Development Council  
Samish Indian Nation  
Seneca Nation of Indians  
The Feminist Majority Foundation  
The Latino Coalition  
The National Association of Tribal Historic Preservation Officers  
The Ounce of Prevention Fund  
Virginia Indian Tribal Alliance for Life  
Yocha Dehe Wintun Nation

## C Federal Agencies Appearing in Data

Agency	Frequency	Percent
Administration for Children and Families	15	3.16
Bureau of Indian Affairs	40	8.42
Bureau of Labor Management	4	0.84
Bureau of Ocean Energy Management	1	0.21
Centers for Disease Control and Prevention	1	0.21
Consumer Financial Protection Bureau	6	1.26
Centers for Medicare and Medicaid Services	50	10.53
Department of Homeland Security	3	0.63
Department of Commerce	1	0.21
Department of the Interior	7	1.47
Department of Justice	3	0.63
Department of State	6	1.26
Department of Transportation	1	0.21
Election Assistance Commission	4	0.84
Employee Benefits Security Administration	3	0.63
Department of Education	72	15.16
Equal Employment Opportunity Commission	1	0.21
Environmental Protection Agency	35	7.37
Employment and Training Administration	4	0.84
General Services Administration	4	0.84
Food and Drug Administration	12	2.53
Federal Emergency Management Agency	5	1.05
Federal Highway Administration	4	0.84
Food and Nutrition Service	16	3.37
United States Forest Service	2	0.42
Food Safety and Inspection Service	2	0.42
Financial Stability Oversight Council	2	0.42
Federal Transit Administration	4	0.84
Fish and Wildlife Service	21	4.42
Department of Health and Human Services	25	5.26
Department of Housing and Urban Development	11	2.32
Internal Revenue Service	20	4.21
Minerals Management Service	3	0.63
National Labor Relations Board	1	0.21
National Oceanic and Atmospheric Administration	6	1.26
National Park Service	5	1.05
Nuclear Regulatory Commission	6	1.26

Office of the Comptroller of the Currency	4	0.84
Office of Federal Contract Compliance Programs	13	2.74
Office of Federal Procurement Policy	2	0.42
Office of Juvenile Justice and Delinquency Prevention	2	0.42
Office of Justice Programs	3	0.63
Office of Management and Budget	1	0.21
Office of Personnel Management	2	0.42
Research and Innovative Technology Administration	2	0.42
Rural Utilities Service	1	0.21
Small Business Administration	2	0.42
Department of the Treasury	4	0.84
United States Courts	3	0.63
United States Customs and Border Protection	1	0.21
United States Citizenship and Immigration Services	23	4.84
Department of Agriculture	1	0.21
Office of the United States Trade Representative	1	0.21
Wage and Hour Division	4	0.84
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Total	475	100%
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## D Intersectional Advocacy in Public Comments - Examples

The text boxes below present examples of public comments containing intersectional advocacy (key content underlined). For a comment to have been identified as containing intersectional advocacy, it must have contained *both* an explicit reference to an intersectionally marginalized population and an explicit policy position or recommendation pertaining to the interests of this group. 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.

Public Comment from Federally Employed Women (advocating on behalf of economically disadvantaged women):

The proposed regulations set forth a mechanism to determine whether women-owned businesses are underrepresented in a specific four digit NAICS code in terms of contracts awarded and dollars of contracts awarded. If there is underrepresentation as determined by either calculation, the NAICS code becomes one in which a contracting officer, if other criteria are met, may limit the competition by those small businesses owned by socially and economically disadvantaged women...

As the NPRM notes, the Central Contractor Registration (CCR) data used to make the determinations of underrepresentation and substantial underrepresentation, is, in all likelihood, incomplete, in that it only includes those women-owned businesses that choose to register in it. Therefore, we recommend that SBA use in its disparity calculations, in addition to CCR data, other data sources that will allow for a more complete picture of the availability of women-owned businesses for competition.

Public Comment from Cowlitz Indian Tribe (advocating on behalf of tribal members with disabilities):

If our TVR program was not here to coach, guide, and provide tribal members with disabilities with culturally holistic services and financial assistance where appropriate, I sincerely feel that most of these individuals would remain on welfare, end up back in incarceration and/or into their addictions, become or remain homeless, not believe enough in themselves to complete their education or to obtain gainful, sustainable employment on their own. This would be largely due to the lack of cultural programs where their beliefs are upheld and honored...

It is my sincere hope that the Department of Education will continue their interpretation of eligibility to include state and federal tribes who don't reside on or near a reservation, but who have a service area where there area large number of tribes with members who would best benefit from structured cultural activities and services.

## **E Perfectly Matching Phrase - Example**

The text boxes below present an example of a perfectly matching phrase (underlined, detected using the comparison rules described in the main text) between a public comment submitted by the Coalition Against Religious Discrimination (CARD) and a rule finalized by the Department of Veterans Affairs (VA).

Public Comment from CARD:



shall not provid services discrimin program beneficiari prospect  
program beneficiari basi religion religi belief refus hold religi  
belief refus attend particip religi practice .

Final Rule by VA:

shall not, provid servic outreach activ relat services discrimin  
program beneficiari prospect program beneficiari basi religion  
religi belief refus hold religi belief refus attend particip  
religi practice .

## F Extended Summary Statistics - Key Variables

Variable	Mean	Min.	Max.	Std. Dev.	Obs.
Lobbying Influence	54.05	0	741	99.70	209
Financial Capacity	5,939,001	3,918	185,000,000	15,700,000	475
Coalition Size	16.30	1	400	46.90	475
Proposed Rule Salience	43,767	0	2,682,626	236,926	475
Proposed Rule-Comment Similarity	69.08	0	2,085	172.91	209
Comment Length	2,258	25	41,140	4,039	475

## G Model 2 - Justification of Model Choice

As noted in the main text of the manuscript (see footnote 28), the dependent variable of Model 2 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, due to the largely unknown small sample behavior of ML estimators, existing work cautions against the use of MLE with small samples (Long 1997). Recommended guidelines for the use of MLE suggest its application when the sample size is, optimally, 100 or greater and when there are at least 10 observations per parameter; when these guidelines cannot be met, the use of the OLS model is recommended and superior to MLE (Long 1997). Since the number of observations in this model (71) is fewer than 100, an OLS model is the more appropriate choice. However, since the case is somewhat ambiguous (the number of observations in my model is not far from the recommended cut-off), I include the results of a gamma regression model – which affirm the primary findings presented in the main text – in Appendix L.

## H Model 1 - Regression Table

<i>DV: Intersectional Advocacy</i>	1
Coalition	2.304* (0.615)
Financial Capacity	0.140* (0.072)
Coalition Size	-0.386* (0.147)
Proposed Rule Saliency	-0.009 (0.061)
Proposed Rule Complexity	0.245* (0.144)
Intersectional Mission	1.039 (0.759)
Intercept	-3.254* (0.904)
<i>N</i>	471
<i>Pseudo R</i> <sup>2</sup>	0.096

\* $p < 0.1$

# I Model 1 – No Tribes

<i>DV: Intersectional Advocacy</i>	<b>1</b>
Coalition	1.407* (0.824)
Financial Capacity	0.043 (0.132)
Coalition Size	-0.351* (0.172)
Proposed Rule Saliency	0.062 (0.073)
Proposed Rule Complexity	0.243 (0.161)
Intersectional Mission	0.547 (0.745)
Intercept	-1.495 (1.948)
<i>N</i>	226
<i>Pseudo R</i> <sup>2</sup>	0.046

\*  $p < 0.1$

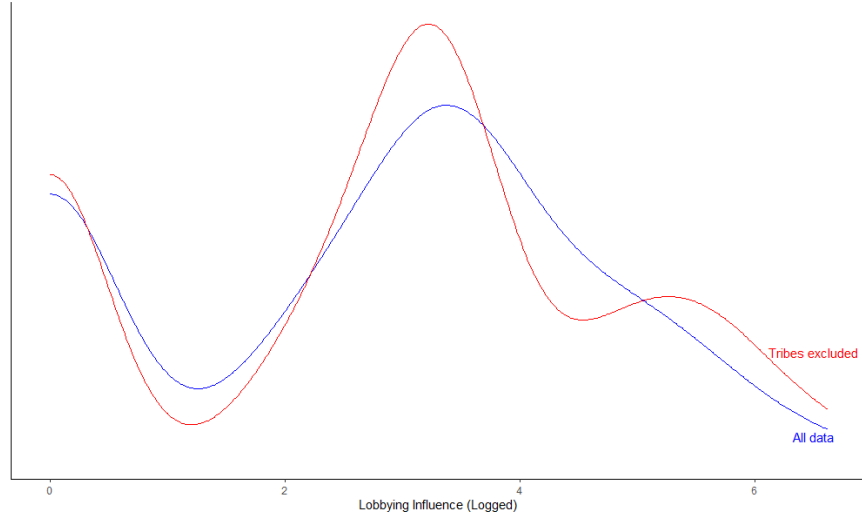
## J Model 2 - Regression Table

<b>DV: Influence of Intersectional Advocacy</b>		<b>2</b>
Coalition	-0.951	(0.557)
Organizational Diversity	0.832*	(0.391)
Financial Capacity	0.178*	(0.065)
Coalition Size	0.366*	(0.205)
Proposed Rule Salience	-0.047	(0.101)
Proposed Rule Complexity	-0.038	(0.137)
Proposed Rule-Comment Similarity	0.669*	(0.097)
Comment Length	-0.040	(0.189)
Intercept	-0.797	(1.383)
<i>N</i>	71	
<i>R</i> <sup>2</sup>	0.53	

\*  $p < 0.1$

## K Model 2 – Comparison of Data With/Without Tribes

<b>Data</b>	<b>Mean of Lobbying Influence</b>
All Data	2.66
Tribes Excluded	2.92



## L Model 2 - Gamma Regression

<i>DV: Influence of Intersectional Advocacy</i>	<b>2</b>
Coalition	-0.452 (0.342)
Organizational Diversity	0.573* (0.317)
Financial Capacity	0.064 (0.040)
Coalition Size	0.117 (0.124)
Proposed Rule Salience	0.012 (0.063)
Proposed Rule Complexity	-0.046 (0.073)
Proposed Rule-Comment Similarity	0.362* (0.132)
Comment Length	-0.083 (0.205)
Intercept	-0.471 (1.469)
N	71

\*  $p < 0.1$

## References

- Frank R. Baumgartner, Jeffrey M. Berry, Marie Hojnacki, Beth L. Leech, and David C. Kimball. *Lobbying and Policy Change: Who Wins, Who Loses, and Why*. University of Chicago Press, Chicago, IL, 2009.
- J. Scott Long. *Regression Models for Categorical and Limited Dependent Variables*. Sage Publishing, Thousand Oaks, CA, 1997.