Organizational Leaders and Intersectional Advocacy

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Social and economic justice organizations often provide the sole form of political representation for marginalized communities in the United States. However, despite broad representational claims, they seldom advocate on behalf of constituents with intersectional disadvantage. We argue that social and economic justice organizations pursue intersectional advocacy at higher rates under conditions of *descriptive representation* by their leaders. We test this claim using an original dataset of bureaucratic lobbying efforts by a set of such groups between 2004 and 2014. We find that organizations led by women of color and white women promote intersectional advocacy at significantly higher rates than those led by men of any race or ethnicity, but that these leadership conditions do not govern the influence of such work. Rather, we observe that financial capacity predicts the influence of intersectional advocacy. We conclude that descriptive representation among leaders can rectify biases in advocacy agendas, but that financial constraints pose barriers to intersectional policy influence.

In the summer of 2020, twenty former staffers at three of the oldest women's organizations in the United States – the National Organization for Women (NOW), the Feminist Majority Foundation (FMF), and the American Association of University Women (AAUW) – came forward with claims of racism and bias in the organizations' cultures and advocacy strategies. They detailed what they characterized as the groups' regular silencing of individuals who sought to elevate issues affecting intersectionally-marginalized women in policy discussions and a systemic aversion to promoting any such "narrow" or "controversial" issues in their advocacy. The employees attributed these practices to the predominantly white leadership of the organizations, arguing that with "staffers of color [...] concentrated in lower-level positions [...] white leadership shapes organizational priorities that feel largely irrelevant to women who are not white, straight, cisgender, highly educated and upper-middle class" (Kitchener 2020).

These allegations echo the findings of a growing body of research about *intersectional advocacy*, a term we use to describe advocacy on behalf of multiply-disadvantaged subgroups of broader marginalized groups. Scholars have shown, for example, that women's and social and economic justice organizations prioritize issues affecting their advantaged constituents more than those affecting constituents whose marginalization is structured by the intersection of multiple forms of disadvantage – what scholars have come to call, following legal scholar Kimberlé Crenshaw (1989), *intersectional marginalization* (see also Dwidar 2022a; English 2019; Marchetti 2014; Strolovitch 2007). These allegations also suggest that leaders play important roles in setting organizational agendas – particularly with respect to organizations' attention to issues affecting intersectionally-marginalized subgroups of their constituencies. While scholars attribute a great deal of impact to organizational leaders (see Andrews et al. 2010; Smith et al. 1984; Baggetta et al. 2013; Morris 1984; Zald and McCarthy 1987), they have yet to examine the

connection between leaders' identities and the extent of their organizations' intersectional advocacy.

Although multiple factors govern the likelihood of intersectional advocacy, we argue that a key – and under-explored – source is organizational leadership. Drawing on theoretical and empirical work about representation, we theorize that leaders who are members of marginalized groups understand and feel a responsibility and intrinsic motivation to elevate the interests of both their descriptively congruent constituents and those of other minoritized populations (Broockman 2013; Mansbridge 1999; Young 1997). We hypothesize that all else equal, organizations led by such officers will pursue intersectional advocacy at *higher rates* than those that are led by members of dominant groups. Further, building on the work of scholars who show that policymakers often favor the distinct perspectives and professional expertise of such leaders (see Minta 2011), we hypothesize that intersectional advocacy is *more influential* under these leadership conditions.

To test these hypotheses, we rely on data compiled from public comments submitted by social and economic justice organizations on proposed federal agency rules. Interest groups often use public comments to pursue policy advocacy. These comments typically contain a great degree of detail regarding both their policy recommendation and the corresponding target population, and interest groups routinely use them to suggest specific language for inclusion in final agency rules (Haeder and Yackee 2015; Dwidar 2022b). We identify instances of intersectional advocacy by reading each public comment and use plagiarism detection software to operationalize the influence of such advocacy through textual similarity between comment-final rule pairs. Leveraging archival sources, we connect these data to hand-coded characteristics of each organization's senior-most officer in each year of comment submission.

We find that organizations led by both white women and women of color engage in intersectional advocacy at significantly higher rates than those led by men of any race or ethnicity, but that these leadership conditions do not govern the influence of such work. Rather, we observe that organizational financial capacity predicts the influence of intersectional advocacy. We conclude that while descriptive representation among leading officers can rectify biases in organizations' advocacy agendas, financial constraints pose significant barriers to intersectional policy influence. This conclusion advances our understanding of advocacy and representation by establishing a relationship between the characteristics of organizational leaders and interest group agenda-setting, with important implications for understandings of organizational behavior, leadership roles, and intersectional policy implementation.

Theoretical Foundations and Argument

Under what conditions are intersectionally disadvantaged groups represented in politics? To answer this question, scholars have examined the activities of citizens, protest movements, elected representatives, and interest groups. Most germane for our purposes here is research showing that even those groups that claim to advocate on behalf of marginalized populations devote scant attention to issues affecting intersectionally marginalized members of their constituencies (English 2019; Marchetti 2014; Strolovitch 2007). Scholars, too, have observed that coalitional lobbying facilitates intersectional advocacy and that organizations are more likely to succeed in their intersectional efforts under conditions of collaboration (Dwidar 2022a; Strolovitch 2007). However, research on the factors that produce or prohibit intersectional advocacy remains limited. While some existing work has explored the connection between external conditions (such as interest group networks, political contexts, and policy conditions) and interest groups' intersectional advocacy, we have yet to understand the impact of *internal*

organizational conditions – such as the characteristics of group leaders – on the promotion and influence of intersectional policy proposals, particularly in the bureaucratic setting.

Interest Groups and Bureaucratic Policymaking

Over the last several decades, the bulk of national policymaking authority has been displaced to the federal bureaucracy; to date, approximately 90 percent of U.S. law originates at the agency-level (Lewis 2004; Warren 2020). This shift in policymaking burden has led to an increase in the power of interest groups, due to their overwhelming activity and authority in the bureaucratic venue (Yackee 2006). For reference, interest groups serve the bureaucracy in key ways: they help bureaucrats to shape public opinion (Hrebenar 1997), resist interference by political principals (Carpenter 2002), secure budgets (Berry 1989), and develop regulatory proposals by providing expert consultations and information (Golden 1998). This sharing of expertise allows bureaucrats to identify problems with proposed regulations and, when there is consensus among interest groups, agencies often use their recommendations to alter their regulatory direction (Haeder and Yackee 2015).

Bureaucratic policymaking is governed by the Administrative Procedure Act (APA) and derives from the lawmaking authority of Congress and the President. The APA specifies that after new laws are passed by both chambers of Congress and approved by the President, they are then sent to relevant federal agencies for implementation. The most common implementation process is "notice-and-comment" rulemaking, which involves three steps. First, agencies must draft and publicize "proposed rules" describing their preferred implementation procedure for specified notice-and-comment periods. Second, during these periods, any public entity – including private citizens, political actors, and interest groups – may submit public comments regarding the rule. These comments may broadly express support or disapproval or may make

specific suggestions for improving the regulatory content. Because commenters usually hold expertise in the subject area of the rule, these comments are a critical information source for federal agencies. Upon closure of the notice-and-comment period, agencies must review all received comments and issue a legally-binding final rule.[1] A large body of research has found evidence of comment influence during this process and documented that interest groups submit the vast majority of comments received during these periods (Golden 1998; Kerwin et al. 2011).

Interest Group Advocates for the Marginalized

Members of historically marginalized communities face significant barriers to political participation in American politics. These barriers are attributable to individual and institutional limitations and often yield the under-representation of their interests through traditional avenues (Brady et al. 1995). Legislators, for instance, have limited incentives to address the concerns of groups with low participation rates and are typically more responsive to the policy preferences of their more advantaged constituents (Gilens 2004). Social and economic justice advocacy organizations respond to this disparity by serving as "compensatory representatives" for marginalized communities (Strolovitch 2007).

Organizational advocates for the marginalized have increased exponentially in number over the course of the past half century, spurred in part by social and racial justice movements in the early and mid-1900s (Pinderhughes 1995; McConnaughy 2013). By 2007, there were over 1,000 organizations representing marginalized groups in national politics, including more than 150 economic justice organizations, more than 50 African American organizations, over 100 women's organizations, and 30 organizations representing women of color, as well as scores of

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[1] While agencies often amend rules in response to comments received during this process, they are not required to do so. However, the threat of judicial review of agency rules incentivizes bureaucrats to consider all public comments received in good faith.

labor unions, non-profit service providers, legal advocates, think tanks, and citizen and public interest groups (Schlozman and Tierney 1986; Strolovitch 2014).

While many of these organizations are now important players in American politics, they face significant barriers to influence, some of which contribute to biases in their advocacy. Their memberships and budgets are typically smaller, for example, than those of their counterparts that represent dominant groups and interests (Imig 1996). They depend heavily on funding from sources that reflect more advantaged interests (see Schlozman et al. 2012) and increasingly, face a crowded and competitive lobbying environment – incentivizing them to specialize in order to enhance their influence (Hojnacki 1998). As a result, organizational advocates for marginalized communities frequently focus their efforts on "winnable" policy issues that appeal to their most active and advantaged supporters, at the expense of those with intersectional disadvantage (Marchetti 2014; Strolovitch 2007).

Descriptive Leadership and Intersectional Advocacy

Scholars of political representation have long argued that descriptive representation – the condition under which individuals in policymaking positions have characteristics that mirror those of their constituents – begets substantive representation, the condition under which individuals in policymaking positions promote and achieve policy changes that reflect the interests of particular groups (LeRoux 2009; Pitkin 1967; Welch and Bledsoe 1988). Much of this work has examined the impact of gender- and race-based representation in legislatures, finding that women legislators and legislators of color pursue descriptively representative policies at higher rates than their white and men colleagues, but noting that this work does not always yield the desired policy outcomes (Bratton and Haynie 1999; Brown 2014; Reingold, Haynie and Widner 2020; Minta 2011).

In the administrative setting, scholars have reported that women bureaucrats are more likely to implement policy that reflects the "needs, preferences, and demands of American women" (Dolan 2000, 514). Additionally, racially representative bureaucracies compel more positive policy outcomes for both racial minority and non-racial minority constituents (Meier et al. 1999). In the judicial setting, women and Black judges are more likely to rule in favor of the plaintiff in cases of sex discrimination, racial discrimination, and affirmative action (Boyd 2016; Boyd et al. 2010; Kastellec 2013). These dynamics are attributable to conditions of ethnic group consciousness, linked fate, shared experience, unique knowledge, and strategic group uplift (Gryski et al. 1986; McClain et al. 2009; Minta 2011; Minta and Sinclair-Chapman 2012).

A much smaller body of work has considered the role of descriptive representation by organizational actors. Organizational leaders have significant influence over their groups' structures, priorities, and agendas. They develop their groups' strategies, tactics, and alliances (Baggetta et al. 2013; Morris 1984); spearhead the fundraising and mobilization of resources (Zald and McCarthy 1987); launch and maintain programs; engage active members; recruit new members; and expand their name recognition (Andrews et al. 2010; Smith et al. 1984). Given their unique abilities to guide their organizations' direction and activities, organizational leaders' issue priorities should be reflected in their groups' advocacy agendas.

Indeed, organizations with greater community representation on their boards of directors develop agendas that better reflect the needs of their constituents (Tourigny and Miller 1981) and groups that are demographically representative of their constituents are more likely to deliver services consistent with constituency interests (Meier 1993; Meier and Bohte 2001; LeRoux 2007; Sowa and Selden 2003; Welch and Bledsoe 1988). Organizational leaders also act as substantive representatives for constituents whom they descriptively represent *and* for

constituents belonging to other minoritized communities. For example, non-profit organizations are more likely to promote the interests of communities of color and issues of diversity when led by Black and women leaders (see Gooden et al. 2018, Johansen and Zhu 2017). Additionally, leaders who are women or people of color are more likely than their men and white counterparts to promote the interests of minoritized communities that they do not directly descriptively represent (Gooden et al. 2018). Based on similar findings from scholarship on representation in the legislative, judicial, and bureaucratic settings – and alongside work showing that organizational leaders have significant influence over their groups' structures, priorities, and agendas (Andrews et al. 2010; Smith et al. 1984; Baggetta et al. 2013; Morris 1984; Zald and McCarthy 1987) – we hypothesize that social and economic justice organizations led by women and/or people of color will pursue intersectional advocacy at higher rates than their white and men counterparts (*Hypothesis 1*).

Descriptively representative leaders are also uniquely equipped to successfully influence policymaking. Women leaders and leaders of color bring specific knowledge and expertise to their roles stemming from their professional backgrounds and personal experiences as members of marginalized groups (Boyd 2016; Gryski et al. 1986). For example, women policymakers' personal experiences and relationships with other women provide a heightened awareness of the problems and issues that women constituents may encounter (Dolan 2000). Alongside the substantive expertise and political skills required of their leadership positions, this awareness allows women policymakers to more adeptly recognize policy failings and develop more effective and informed solutions for women's unique needs (Dolan 2000).

As an example, consider the appointment of Maya Wiley to the position of president and chief executive of the Leadership Conference on Civil and Human Rights (LCCR) in March

2022. A press release announcing Wiley's appointment linked both her personal background and professional experiences to her expected successes in the new role. The release describes her selection as a "homecoming of sorts," noting that Wiley, the daughter of National Welfare Rights Organization founder Dr. George Wiley, "comes from a family dedicated to civil rights." It also touts her professional understanding of "litigation…the political arm…[and] the economic opportunity angle" as a former federal prosecutor and legal analyst (Nakamura 2022). Scholars have documented that these very forms of expertise are considered "credible and persuasive" in policymaking spaces (Boyd, Epstein, and Martin 2010, 392).

In the bureaucratic setting, this expertise and awareness are uniquely valuable. Expertise is an important condition for influence in this venue, as bureaucrats are highly professionalized policy actors with far greater information than their counterparts in other institutional settings. In developing agency rules, they are often tasked with reviewing thousands of public comments per proposed rule and have strong incentives to favor policy recommendations with high informational content and credibility (Yackee 2006). Since descriptively representative organizational leaders often draw on their personal experiences and professional expertise in developing policy ideas, their proposals should contain such informative and credible content. As such, we anticipate that organizations led by women and/or people of color will be more influential intersectional advocates than those led by their white and men counterparts (*Hypothesis 2*).

Data

We test our hypotheses by examining the content of notice-and-comment lobbying efforts by a set of social and economic justice organizations, as well as the degree to which federal agencies adopted recommendations made by their efforts. We identified instances of

intersectional advocacy by reading each public comment by hand and used plagiarism detection software to operationalize each comment's "lobbying influence" through textual similarity between its language and that of its corresponding final rule. Finally, leveraging archival sources, we connected these data to hand-coded characteristics of each organization's senior-most staff member in the year of comment submission.

Selecting Interest Groups and Agency Rules

We examine 470 public comments authored by a random sample of 75 social and economic justice organizations active in national politics between 2000 and 2014.[2] The sample of organizations was drawn from the population of all groups representing women, people of color, and low-income people at the national level, using data compiled by the Center for Responsive Politics. We define the population of groups "active in national politics" as all those that submitted at least one lobbying disclosure report during the period under study. Importantly, in submitting these reports, organizations must identify the primary policy focus of their lobbying. We drew our sample from the population of all organizations that reported lobbying primarily on one of the following policy foci: women's issues, minority/ethnic issues, issues affecting Native American tribes, and anti-poverty issues. Here, it is important to note that our sample size was chosen with practical considerations in mind. To generate data for this sample, over 5,000 public comments were read and each observation was hand-coded across twenty attributes – a two-year long process. Our chosen sample size thus reflects a sensible compromise between practical limitations and inferential strength.

The sample represents an array of organizational participants in politics, as illustrated in Table 1. Native American tribes and not-for-profit organizations, such as the Cheyenne River

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[2] This sample originally contained 75 organizations. One organization did not author any public comments during the period under study.

Sioux Tribe and Asian Americans Advancing Justice (AAJC), account for the majority of the

sample. Advocacy groups and non-profit business leagues comprise the second-largest set of

groups in the sample. Examples include the League of United Latin American Citizens

(LULAC), Immigration Voice, and the Leadership Conference on Civil and Human Rights

(LCCR). One member of the sample, the Institute of American Indian Arts, is an academic

institution (see Appendix A for the organizational type coding scheme and Appendix B for the

list of the organizational members of the sample).

Table 1: Organizations in Sample by Type

Organizational Type	Frequency	Percent
Academic institution	1	1.35
Advocacy group	7	9.46
Native American tribe	45	60.81
Non-profit business league	3	4.05
Non-profit organization	18	24.32
Total	74	100%

The policy foci of the groups in the sample are similarly varied, as illustrated in Table 2.

At almost 61%, interest groups lobbying primarily on Indigenous policy issues comprise the

largest proportion of groups in the sample. This proportion approximates the makeup of the

broader population: among all interest groups identified through the CRP's data as representing

women, people of color, Native American tribes, and low-income people during the period under

study, approximately 40% focus on issues of Indigenous policy. Organizations focusing on

issues of ethnicity and race compose the second largest body in the sample, at approximately

23%. Organizations focusing on anti-poverty issues make up roughly 14% of the sample; those

lobbying primarily on women's issues compose just under 3%.

Table 2: Organizations in Sample by Policy Focus

Policy Focus	Frequency	Percent
Anti-poverty	10	13.51
Racial/ethnic groups	16	21.62
Native American tribes	46	62.16
Women's issues	2	2.70
Total	74	100%

The public comments in our sample addressed 248 rules proposed by 55 federal agencies.[3] These agencies span a range of policy specializations and sizes – from the Administration for Children and Families to the Election Assistance Commission to the Centers for Disease Control and Prevention. They also contain a mix of independent agencies (25%) and executive branch agencies (75%). Appendix C lists the agencies appearing in the data. The agency rules under consideration also span a range of policy subjects. Nearly all of the major policy topics proposed by the Policy Agendas Project's (PAP) common coding scheme – 20 out of 21 – are present, as illustrated by Figure 1. Most proposed rules in the data address issues having to do with public lands (20%), health (18%), or education (14%). These percentages reflect patterns in the broader population and policy context, as the sample, like the population from which it was drawn, contains a significant proportion of Native tribes (see Table 1), and as health and education policy reform were salient on the national governmental agenda during our temporal domain. The proposed rules also represent policies with ranges of political salience and technical complexity. They include straightforward, low-salience proposals, such as the proposed designation of a critical habitat under the Endangered Species Act, as well as more technical and salient efforts, such as a rule governing preventative services coverage under the Affordable Care Act.

Figure 1: Proposed Agency Rules by Policy Topic

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[3] Approximately 3,000 rules are published yearly, and there are between 250 and 400 federal agencies in existence (Administrative Conference of the United States, *Sourcebook of United States Executive Agencies*, 2012).
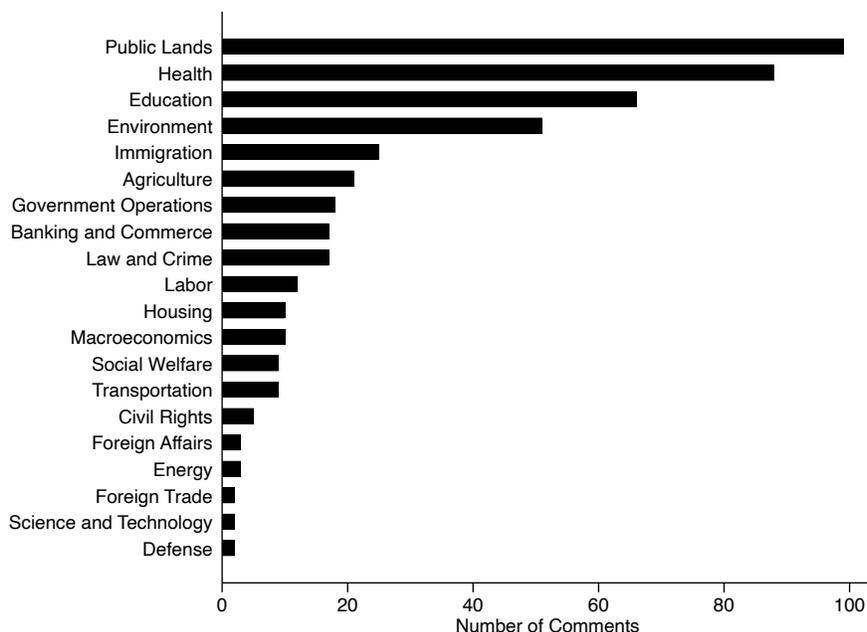
Collecting and Preprocessing Public Comments and Agency Rules

To collect the set of all public comments submitted by the organizations in our sample, we relied on Regulations.gov's interactive Application Programming Interface (API). Our procedure required four steps:

First, we built queries to return all public comments submitted by each interest group in our sample. We specified parameters for docket type (rulemaking), date of submission, (January 1, 2004 through December 31, 2014), and keyword (organization name). We then read all comments returned by these queries and removed false positive results.[4] Next, we used optical character recognition (OCR) software to transcribe all remaining comments.[5] Finally, in line with standard conventions for text analysis, we preprocessed all public comment and regulatory documents. This procedure involved the conversion of all words to their stems and removal of

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[4] This API only allows for free-text searches, rather than searches by comment author. The above-mentioned queries yielded all comments in which a group was *mentioned*, rather than all comments *authored* by a group. The initial queries returned approximately 5,000 comments, of which 470 were submitted by groups in our sample.
[5] Where necessary, we supplemented the use of this software with manual transcription and error-correction.

stop words, figures, graphics, appendices, and capitalization (Grimmer and Stewart 2013).[6]

Dependent Variables

To better understand the role of organizational leadership in intersectional advocacy, we examine two dependent variables: the *occurrence* and *influence* of intersectional advocacy. To operationalize both variables, we replicate coding procedures introduced by Dwidar (2022a). More specifically, to operationalize the *occurrence of intersectional advocacy*, we read each public comment and sought to determine whether it contained a policy recommendation addressing the interests of an intersectionally marginalized population. This recommendation may have taken any form, as long as it identified a specific policy position (such as revising or clarifying policy content, requesting greater context or detail, or expressing general support or opposition). The recommendation may have constituted the entirety of a public comment or may have been one of several proposals. Computationally, this variable takes the form of the number of public comments containing intersectional advocacy by each organization in our sample, yearly. Appendix D provides examples of intersectional policy recommendations observed in our corpus.

To develop a measure of the *influence of intersectional advocacy*, we first produced a binary variable expressing whether each comment in the data promoted intersectional advocacy – using the same decision rules described in the paragraph above. We then leveraged text analysis tools to compare the text of each intersectionally-oriented public comment to that of its corresponding final rule using WCopyfind, a plagiarism detection software that reports similarities in the words and phrases contained in textual documents. More specifically, we

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[6] A "stem" is the root of a word remaining after suffixes are removed. For example, the words "labeling", "labeled", and "labeler" share the same stem: "label". Stemming words in a corpus allows for the grouping of words that share a substantively common meaning but may differ superficially. Stop words are words that serve a grammatical purpose and do not otherwise convey meaning. Examples include "a", "but", "and", "how", "or", and "what".

adopted the following comparison rules to detect all "perfectly matching" phrases between comment-final rule document pairs.[7] Finally, we computed the total number of words contained in all "perfectly matching" phrases between document pairs – our final operationalization.[8]

- Shortest phrase to match[9]: 6 words

- Most imperfections to allow[10]: 2

- Minimum percent of matching words[11]: 100%

- Skip non-words[12]

- Skip words longer than 20 characters[13]

Independent Variables

Our key predictor variables are the gender and race of the leading officer of each organization in our sample. We operationalized these variables by navigating to a web archive of each organization's website in the year of comment submission and searching for the name and biography of the senior-most officer of the organization (e.g., the President, Executive Director, etc.).[14] To code gender and race, we developed a procedure closely based on those of Visalvanich (2017) and Hassell and Visalvanich (2019). Specifically, we examined a combination of leaders' pictures, surnames, and biographies, paying particular attention to the pronouns used to describe the leader in the case of gender. If the leader appeared to identify as a woman, we assigned the *gender* variable a value of 1; otherwise, we assigned it a value of 0. If the leader appeared to be a

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[7] These decision rules were informed by work that has found them to be reliable for detecting text re-use in policy documents (Lyon et al. 2001; Clough and Stevenson 2011; Kroeger 2016).

[8] See Appendix E for an example of a perfectly matching phrase identified using this approach.

[9] Minimum string length considered to be a match.

[10] Maximum number of non-matches allowed between perfectly matching portions of a phrase.

[11] 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.

[12] Words containing any characters other than letters, except for internal hyphens and apostrophes.

[13] Often non-textual items, including filenames, URLs, or image data.

[14] We navigated to these web archives by entering each organization's current website into the Wayback Machine.

member of a minoritized racial group, we assigned the *race* variable a value of 1; otherwise, we

assigned it a value of 0. In cases in which the leader's gender or race remained ambiguous after

examining their picture, surname, and biography, we searched for primary and secondary

biographical sources to aid in making the determination. In cases where ambiguity persisted after

searching for biographical sources, we left the variable(s) blank.[15] Using this coding procedure,

we were able to identify both characteristics for 96% of observations in the data.

In addition to these key variables, we also collected several secondary control variables.

First, we collected data on the *financial capacity* of each organization in the sample. As

explained previously, existing research has found that social and economic justice groups pursue

intersectional advocacy at higher rates when they have greater financial resources (Dwidar

2022a). To account for this dynamic in our analyses, we recorded each organization's total

revenue in the year of comment submission from 990 forms made available by Propublica.

Second, we collected information about the *salience of each proposed rule*. When

proposed rules are of greater consequence, or when they are relevant to a broader or cross-cutting

audience, more actors may attempt to debate its content, often by submitting public comments.

In this multi-dimensional environment, intersectional advocacy may be more likely to occur. To

account for this possibility, we operationalized this variable through the total number of public

comments submitted in response to the rule.

Third, we collected information about the *complexity of each proposed rule*. More

complex public policies often span multiple policy topics and target populations. Intersectional

advocacy is, by nature, more likely to address policies of this kind. To account for this

relationship, we operationalized this variable by using the Policy Agendas Project's common

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[15] Cases where this ambiguity persisted after searching for biographical sources were dropped from the dataset.

coding scheme and guidelines to tally the total number of policy sub-topics encompassed by the summary of each rule.

We also collected data about two characteristics of the organizations in our sample that previous research (Strolovitch 2007) has argued help to determine how active they will be on issues affecting intersectionally-disadvantaged subgroups. Some organizations are devoted explicitly to representing intersectionally marginalized populations, such as Start Early (formerly the Ounce of Prevention Fund), which advocates on behalf of children in under-served communities. By virtue of their missions, these groups are more likely to promote intersectional advocacy. To account for this dynamic, we coded each organization for whether it promoted an explicitly *intersectional mission* in the year of comment submission. If it did, we assigned the variable a value of 1; if it did not, we assigned the variable a value of 0.

In addition, organizations that rely on membership dues are often beholden to the preferences and priorities of their paying members (Strolovitch 2007). These members are typically among the most advantaged of the groups' constituents and often express ambivalence towards the promotion of intersectional advocacy (Dwidar 2022a). To account for this relationship, we coded each organization for whether it maintained a *paying membership* in the year of comment submission. If it did, we assigned the variable a value of 1; otherwise, we assigned it a value of 0. We made these determinations by navigating to a web archive of each organization's website in the year of comment submission and searching for their mission statements and membership terms.[16]

Sixth, we developed a measure of *proposed rule-public comment textual similarity*. Final rules frequently contain a proportion of text from their original proposed rules. Public comments

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[16] We navigated to these web archives by entering each organization's current website into the Wayback Machine.

often quote language from the original regulatory proposal, either as a point of comparison to their own recommendations or to direct bureaucrats to the sections of the proposed rules they reference. Critically, this qouted language may remain in the final rule and thus contribute to an over-estimation of our secondary dependent variable. To address this potential measurement concern, we computed this measure using the same procedure used to develop our secondary dependent variable.

Finally, public comments that contain more text are likely to share more language with the final rule. To account for this dynamic, we recorded the *length of each public comment*, operationalized as the number of words contained in each comment after preprocessing.

Summary Statistics and Empirical Strategy

Of the 470 public comments in our dataset, 156 (33%) contained intersectional advocacy. Table 3 presents the breakdown of these advocacy efforts by policy focus. Women's organizations and anti-poverty groups devote the largest proportion of their lobbying efforts to intersectional advocacy – approximately 61% of public comments submitted by women's organizations and 59% of comments submitted by anti-poverty groups were intersectional in nature. Groups that focus on racial/ethnic policy issues maintained the third highest rate of intersectional advocacy within their comments, at 49%. At approximately 18%, groups working on Indigenous policy issues demonstrated the lowest rate of intersectional advocacy in their public comments.

Table 3: Rate of Intersectional Advocacy by Policy Foci

Policy Focus	Frequency	Percent
Anti-poverty issues	26	59.09
Racial/ethnic groups	76	49.67
Native American tribes	46	17.69
Women's issues	8	61.53
Total	156	-

Table 4 displays the number and proportion of intersectionally-oriented comments aggregated by the gender and race of the submitting organization's leader. As illustrated, nearly 40% of all intersectional comments in the data were submitted by organizations led by men of color. Approximately 35% were submitted by organizations led by women of color. Organizations led by white women and white men were responsible for the smallest proportions of these efforts, at approximately 16% and 10% respectively.

Table 4: Intersectional Advocacy by Group Leader Gender and Race – Aggregated

Characteristic	Frequency	Percent
Man of color	62	39.74
Woman of color	54	34.61
White man	15	9.61
White woman	25	16.02
Total	156	100%

Additionally, as illustrated in Table 5, among all intersectionally-oriented comments in the data, more than half were submitted by organizations led by Indigenous people. Approximately one-quarter (24%) were submitted by organizations led by white people. Groups led by African American, Asian American, and Hispanic or Latinx people were responsible for a minority of intersectional advocacy efforts in the data.

Table 5: Intersectional Advocacy by Group Leader Race

Race	Frequency	Percent
African American	9	5.77
Asian American	9	5.77
Hispanic/Latinx	12	7.69
Indigenous	88	56.41
White	39	24.36
Total	156	100%

Table 6 provides descriptive statistics for each of the key variables.[17] Here, it is important

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[17] Due to the wide variance characterizing lobbying influence, proposed rule salience, proposed rule-comment similarity, and comment length, their natural log(s) were adopted in the analyses below. Because the lobbying

to highlight one aspect of the data. As illustrated in Table 6, the number of observations for all

lobbying influence-related variables is smaller than the number of observations contained in the

broader dataset. This characteristic reflects a key aspect of the regulatory policy process: the

notice-and-comment process often takes years to resolve, and in some cases, proposed rules may

be withdrawn by their issuing agencies (Potter 2019). As such, not all comments in our data

correspond to a published final rule, which is a necessary criterion for the measurement of our

secondary dependent variable and related control variables. Thus, the data appearing in analyses

containing these variables are limited by this characteristic.

Table 6: Summary Statistics, Key Variables

Variable	Mean	Min.	Max.	Std. Dev.	Obs.
Lobbying influence*	2.63	0	6.61	1.87	206
Financial capacity*	9.14	0	19.03	7.81	470
Proposed rule salience*	5.85	0	14.80	2.87	470
Proposed rule complexity	1.52	1	7	0.97	470
Proposed rule-comment similarity*	2.94	0	7.64	1.78	206
Comment length*	7.11	3.22	10.62	1.02	470

*Logged transformation of original variable
**Normalized Shannon's H operationalization

Models

We tested Hypothesis 1 – the expectation that social and economic justice organizations

pursue intersectional advocacy at higher rates under women and/or people of color leaders – by

using an Ordinary Least Squares (OLS) linear model to regress the number of comments

containing intersectional advocacy submitted by each organization yearly on three key

independent variables: the presence of a man of color, woman of color, and white woman leader.

We controlled for financial capacity, intersectional mission, paying membership, and the salience

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influence and proposed rule-comment similarity variables contain observations with values of 0, taking their natural log would result in undefined observations. Thus, we applied an $ln(x+1)$ transformation to these variables before including them in the models. Appendix F contains a table with these same summary statistics for the original operationalizations of these four variables.

and complexity of the targeted proposed rules (averaged across all lobbying efforts by each organization, yearly). We accounted for potential correlations within the data by clustering the standard errors by group and applying year fixed effects. These relationships are expressed by the following equation:

$$
\begin{aligned}
IntersectionalAdvocacy = \ \alpha + \ & \beta_1 ManOfColor_i \\
& + \beta_2 WomanOfColor_i \\
& + \beta_3 WhiteWoman_i \\
& + \beta_4 FinancialCapacity_i \\
& + \beta_5 IntersectionalMission_i \\
& + \beta_6 MembershipOrganization_i \\
& + \beta_7 PolicySalience_i \\
& + \beta_8 PolicyComplexity_i + \ \epsilon_i
\end{aligned}
$$

We tested Hypothesis 2 – the expectation that intersectional advocacy is more influential under the same leadership conditions articulated above – by using an OLS linear model to regress intersectional lobbying influence (textual similarity between intersectional comment-final rule pairs) on the presence of a man of color, woman of color, and white woman leader in the year of comment submission. We controlled for financial capacity, the salience and complexity of the original proposed rule, textual similarity between proposed rule and public comment documents, and public comment length. We clustered the standard errors by group to account for potential correlations within the data and applied year fixed effects. These relationships are expressed by the following equation:

$$IntersectionalLobbyingInfluence = \alpha + \beta_1 ManOfColor_i$$
$$+ \beta_2 WomanOfColor_i$$
$$+ \beta_3 WhiteWoman_i$$
$$+ \beta_4 FinancialCapacity_i$$
$$+ \beta_5 PolicySalience_i$$
$$+ \beta_6 PolicyComplexity_i$$
$$+ \beta_7 ProposedRuleSimilarity_i$$
$$+ \beta_8 CommentLength_i + \epsilon_i$$

Results

Figure 2 presents the results of Model 1.[18] This model assesses whether intersectional advocacy is more commonly pursued by organizations led by women and/or people of color. It illustrates several findings: First, there is a positive and significant relationship between the presence of a woman of color leader and the prevalence of intersectional advocacy in public comments, suggesting that groups led by women of color promote intersectional interests in their policy work at higher rates than those led by their white and men counterparts. More specifically, these results suggest that a shift from the leadership baseline (a white man leader) to a woman of color leader increases the average yearly rate of intersectional advocacy in public comments by approximately 30%. This finding strongly supports our hypothesis that intersectional advocacy is more commonly promoted by organizations led by individuals who experience marginalization along racial and gender lines.

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[18] Refer to Appendix G for the corresponding regression table.

Figure 2: Leader Characteristics and Intersectional Advocacy – Model 1
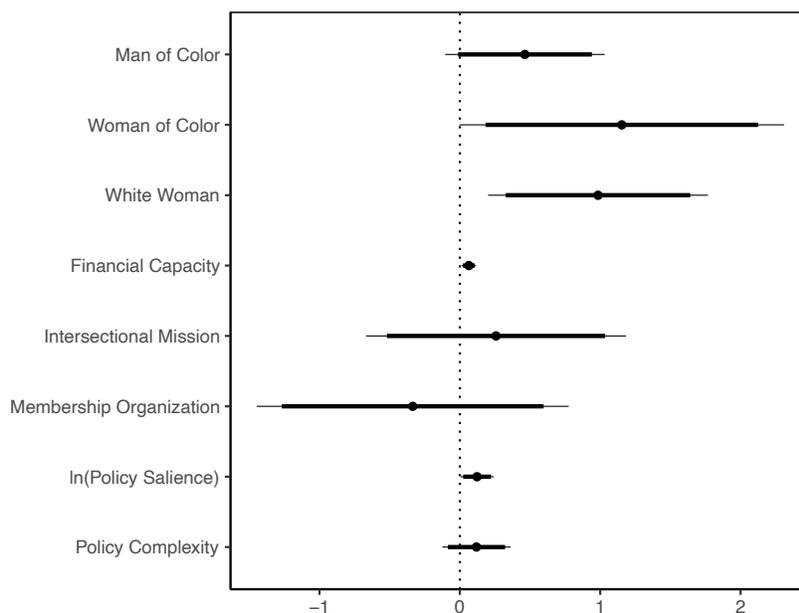
OLS linear regression model with group-clustered standard errors and year fixed effects. $N = 156$. Circles indicate coefficient values. Thick lines indicate 90% confidence intervals. Thin lines indicate 95% confidence intervals.

Second, there is a positive and significant relationship between the presence of a white woman leader and the prevalence of intersectional advocacy in public comments, suggesting that social and economic justice groups led by white women similarly promote intersectional interests in their policy work at higher rates than their men counterparts, albeit to slightly lesser effect. More specifically, these model results suggest that a shift from the leadership baseline (a white man leader) to a white woman leader increases the average yearly rate of intersectional advocacy in public comments by approximately 10%. This finding further supports our expectation that organizations led by women more commonly promote intersectional interests in their policy work.

We observe no relationship between the presence of a man of color leader and the prevalence of intersectional advocacy in public comments, however. This finding, while counter to our expectation, is in keeping with observations by extant literature. Scholars have

demonstrated that while both men and women of color policy leaders have personal and professional motivations to elevate the interests of multiply disadvantaged constituents (Gooden et al. 2018; Kastellec 2013; Minta 2011), it is women of color who most consistently prioritize these issues in their work (Bratton and Haynie 1999; Hurvitz and Schulze 2016; Reingold, Haynie and Widner 2020). Additionally, research on substantive representation by men of color is mixed – some analyses find that men of color devote more attention to issues of identity than their white counterparts, while others find that women of color and white women more frequently prioritize these issues (Bratton and Haynie 1999; Gooden et al. 2018; Hurvitz and Schulze 2016; Kastellec 2013; Reingold, Haynie and Widner 2020). Thus, our findings, while not supporting part of our first hypothesis, are in keeping with prior work demonstrating inconsistent attention to issues of identity by men of color.

There are also several significant and expected directional relationships among the remaining control variables. Intersectional advocacy is significantly more prevalent among organizations with greater financial capacity. This finding is consistent with existing literature demonstrating that social and economic justice organizations with greater financial capacity are more likely to promote intersectional advocacy (Dwidar 2022a). Additionally, intersectional advocacy is significantly more prevalent when policy salience is high. This finding is also intuitive: salient issues may reflect the potential openings of political opportunity windows, which organizations have strong incentives to take advantage of in pursuit of intersectional advocacy.

Figure 3 presents the results of Model 2.[19] This model assesses whether organizations' intersectional advocacy is more influential under the leadership of a woman and/or person of

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[19] Refer to Appendix H for the corresponding regression table.

color. In contrast to Model 1, we observe no relationships between the influence of intersectional advocacy and the presence of a man of color, woman of color, or white woman leader. While this series of findings fails to provide evidence to support our second hypothesis, it does, once again, strongly parallel the existing literature – scholarship on representation in policymaking has demonstrated a connection between descriptive representation and policy *promotion*, but a more tenuous link between descriptive representation and policy *influence* (Bratton and Haynie 1999, Volden, Wiseman and Wittmer 2018).

Scholars of gender and politics have attributed this dynamic to the importance of attaining a descriptively representative critical mass in a policy decision-making body to move beyond "tokenized" status and achieve political and policy influence (Bratton et al. 2006; Dodson and Carroll 1991; Thomas 1994). This logic can be extended to advocacy groups. Like legislatures, the development of organizations' advocacy agendas depends on the work of many actors, including presidents, policy and outreach directors, communications specialists, junior staffers, and members of boards of directors. While organizations' senior-most leaders have agenda-setting and veto power over advocacy content, final advocacy products often reflect a deliberative process shaped by the expertise and opinions of various organizational affiliates (Kitchener 2020). Thus, it may be the case that without congruence in descriptive representation among organizational leaders and their boards of directors and staff, a mismatch may exist between leadership characteristics and intersectional policy influence. Research on legislative staff in the U.S. Congress offers some evidence in support of this suggestion. Wilson (2013), for instance, reports that the presence of Latinx staff in legislative offices is positively associated with agendas that represent Latinx interests. Future work, however, should probe this explanation further.

Figure 3: Leader Characteristics and Intersectional Lobbying Influence – Model 2
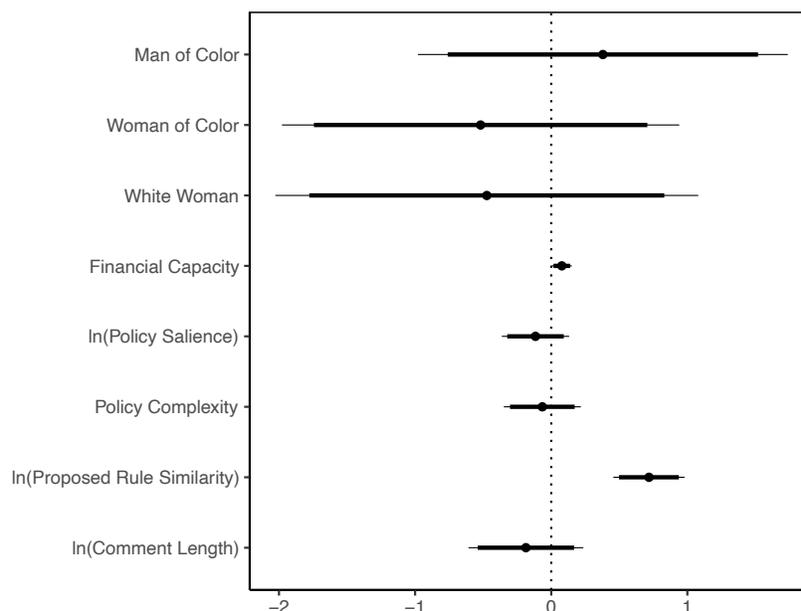
OLS linear regression model with group-clustered standard errors and year fixed effects. $N = 68$. Circles indicate coefficient values. Thick lines indicate 90% confidence intervals. Thin lines indicate 95% confidence intervals.

Finally, the model results also illustrate a positive and significant relationship between the influence of intersectional advocacy and financial capacity. This finding is highly intuitive. Bureaucrats favor recommendations containing high informational content in the notice-and-comment process (Potter 2019). Achieving and articulating policy recommendations containing this content is an arduous and complex task – many organizations expend substantial resources in commissioning studies, acquiring original data, and hiring lawyers to craft and articulate the arguments contained in these documents (Yackee 2006). This finding thus highlights the enduring importance of financial resources for lobbying influence in the administrative setting.

Robustness Checks and Alternative Explanations

It is important to consider several alternative explanations for the findings presented above. In particular, the high prevalence of organizations representing Native American tribes in our sample makes it important to consider their uniqueness as political participants. Native tribes differ from traditional interest groups through their sovereign statuses and unique relationships

with the federal government. However, they are not entirely, as federal policy can significantly impact their needs and functions. As such, they are active participants in American lobbying. Their political activity has increased substantially since the 1988 passage of the Indian Gaming Regulatory Act (IGRA), which provided tribal nations with the financial resources to become active players in American politics. Native tribes have since consistently engaged in national lobbying to ensure and enhance their treaty, land, resource, and political and civil rights (Mason 2000; Steinman 2004; Witmer and Boehmke 2007; Witmer 2012).

Further, a strong scholarly consensus exists surrounding the inclusion of these actors in works seeking to understand interest group politics (Witmer and Boehmke 2007; Boehmke and Witmer 2012). More specifically, scholars have shown that tribal lobbying is similar to that of traditional groups in motivation, frequency, and substance (Witmer and Boehmke 2007; Boehmke and Witmer 2012; Witmer at al. 2014). Thus, there is strong grounding for the inclusion of these participants in our study. Additionally, the interest groups literature – including the small number of works examining interest group representation of historically marginalized communities – has largely neglected the study of tribal lobbying. As such, we consider the prevalence of Native tribes in our data, as well as the inferences we can make about them, to be an asset of our work.

Nonetheless, to ensure that our results are not driven by the presence of Native tribes, we estimated Model 1 excluding those observations. The results of this re-estimation, available in Appendix I, demonstrate support for the findings presented in-text. We are unable to produce a similar re-estimation of Model 2 due to its more limited sample size and concerns for statistical power. In lieu of a re-estimation, we produced a means comparison of the model's dependent variable (intersectional lobbying influence) across the data appearing within it, inclusive and

exclusive of observations of Native tribes. This comparison is available in Appendix J. Figure 4 illustrates a density plot of the dependent variable respective to each subset (Model 2 data with and without Native tribes). Together, these statistics demonstrate that the variable's values do not differ substantially across the data inclusive and exclusive of observations of Native tribes. Thus, there is no reason to suspect that the model's results would differ substantially were tribes to be excluded from the model.

Figure 4: Density of Intersectional Lobbying Influence
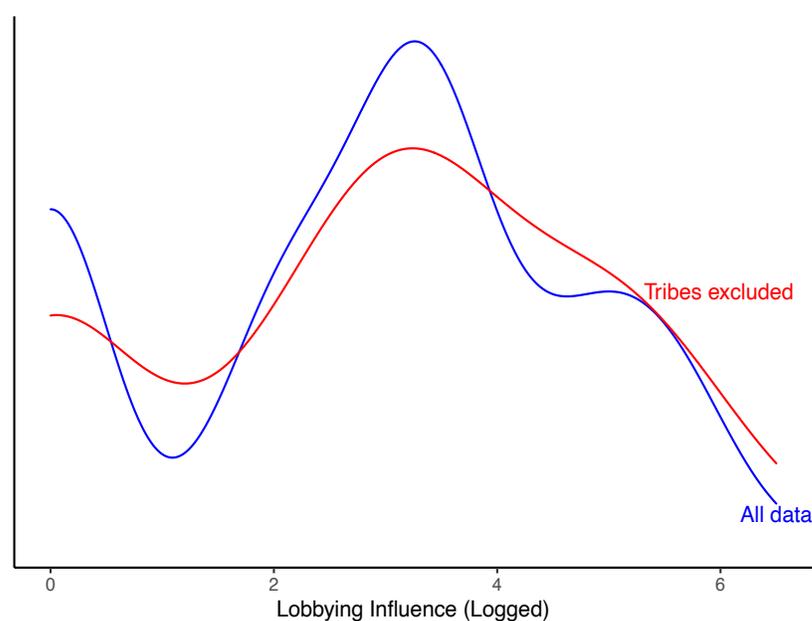
Discussion

Policymaking by the federal bureaucracy is among the most critical functions of American government. The contributions of interest groups to this process, particularly by advocates for historically marginalized communities, are essential to informed and representative policymaking. While scholars have recently begun to expand our knowledge of these organizations in promoting intersectionally-responsible representation, they have paid surprisingly little attention to the possibility that the characteristics of their leaders may influence

the content and influence of their political advocacy. This paper contributes to this gap in the literature by exploring the connection between the gender and race of organizational leaders and the promotion and influence of their advocacy on behalf of constituents with intersectional disadvantage.

Overall, we find that organizations led by women of color and white women promote intersectional advocacy at significantly higher rates than those led by men of any race or ethnicity, but that these leadership conditions do not govern the influence of such work. Rather, we observe that organizational financial capacity predicts the influence of intersectional advocacy. We conclude that descriptively representative leadership can rectify representational biases in interest groups' advocacy choices, but that financial constraints pose significant barriers to intersectional policy influence. We arrive at these findings using an original dataset of organizational leaders' demographic characteristics and advocacy efforts.

This work makes a series of contributions. It is among the first pieces of scholarship on organizational political activity – along with English 2019 and 2021 and Dwidar 2022a – to examine interest group advocates as vehicles for intersectional representation in bureaucratic rulemaking. In addition, this study's key finding regarding the linkage between intersectional identity among organizational leaders and the promotion of intersectional advocacy significantly extends the scope of the existing literature. While existing research demonstrates a connection between political leaders' descriptive identities and policymaking, much of this work fails to account for the impact of *intersectional* identity on leadership actions and outcomes, focusing instead on either gender (Volden, Wiseman and Wittmer 2018) or race (Dancey and Masand 2019; Wilson 2013; Zhu and Walker 2013) in isolation. Furthermore, our work responds to recent calls for attention to the representation of marginalized communities through bureaucratic

governance (Lowande, Ritchie and Lauterbach 2019).

Additionally, our distinction between the predictors of intersectional organizational *agenda-setting* and intersectional organizational *influence* has important implications for scholarship on organizational behavior, leadership roles, and intersectional representation. While external and internal lobbying conditions affect the degree to which organizations prioritize intersectional issues, an even wider range of factors may shape the outcomes of this advocacy. Existing research demonstrates that the agenda-setting stage of the policymaking process allows political actors to support a wider range of groups and interests than later stages (Bratton and Haynie 1999; Lavariega Monforti et al. 2009; Reingold 2000; Wallace 2014). By modeling two separate phases of this process – intraorganizational policy agenda-setting and organizational influence over policy outputs – we offer further evidence that the determinants of intersectional advocacy in earlier stages of the policymaking process may be distinct from those in later stages. Finally, our finding of a relationship between financial resources and intersectional lobbying influence contributes to an extensive literature on wealth, advocacy, and influence in policymaking.

While our research provides insight on the connection between intersectional identities and representation through lobbying, many questions remain. For instance, existing research has reported that advocacy organizations are more likely to successfully address the interests of their constituents when they maintain a more demographically representative staff (LeRoux 2007; Sowa and Selden 2003; Welch and Bledsoe 1988). Do these findings extend to the promotion of intersectional interests or the outcomes of intersectional lobbying efforts? Future work should explore the dynamics of descriptive representation among organizational staff and boards of directors, congruence between organizational staff and leaders, the relationships between

advocacy choices and groups' constituencies, networks, and the capacities of federal agencies, as well as the divergence between women and men leaders' promotion of intersectional advocacy.

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Appendix

Appendix – Table of Contents

Appendix A: Organizational Type Coding Scheme

Each interest group in our sample was classified into one of twelve categories demarcating their organizational type. This classification scheme was informed by the work of Baumgartner et al. (2009) and developed through several iterations of coding interest group actors in a pilot version of this project. We classified interest groups by examining their personal websites and conducting searches for their organizational tax statuses in ProPublica. The scheme consisted of the categories displayed in the table 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

Appendix 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

Appendix C: Federal Agencies Appearing in Data

Agency	Frequency	Percent
Administration for Children and Families	15	3.19
Bureau of Indian Affairs	40	8.51
Bureau of Labor Management	4	0.85
Bureau of Ocean Energy Management	1	0.21
Centers for Disease Control and Prevention	1	0.21
Consumer Financial Protection Bureau	6	1.28
Centers for Medicare and Medicaid Services	50	10.64
Department of Homeland Security	3	0.64
Department of Commerce	1	0.21
Department of the Interior	7	1.49
Department of Justice	3	0.64
Department of State	6	1.28
Department of Transportation	1	0.21
Election Assistance Commission	3	0.64
Employee Benefits Security Administration	3	0.64
Department of Education	70	14.89
Equal Employment Opportunity Commission	1	0.21
Environmental Protection Agency	34	7.23
Employment and Training Administration	4	0.85
Federal Acquisition Regulation	4	0.85
Food and Drug Administration	12	2.55
Federal Emergency Management Agency	5	1.06
Federal Highway Administration	4	0.85
Food and Nutrition Service	16	3.4
United States Forest Service	2	0.43
Food Safety and Inspection Service	2	0.43
Financial Stability Oversight Council	2	0.43
Federal Transit Administration	4	0.85
Fish and Wildlife Service	21	4.47
Department of Health and Human Services	25	5.32
Department of Housing and Urban Development	11	2.34
Internal Revenue Service	20	4.26
Minerals Management Service	3	0.64
National Labor Relations Board	1	0.21
National Oceanic and Atmospheric Administration	6	1.28
National Park Service	5	1.06
Nuclear Regulatory Commission	6	1.28

Office of the Comptroller of the Currency	4	0.85
Office of Federal Contract Compliance Programs	13	2.77
Office of Federal Procurement Policy	2	0.43
Office of Justice Programs	3	0.64
Office of Management and Budget	1	0.21
Office of Personnel Management	2	0.43
Research and Innovative Technology Administration	2	0.43
Rural Utilities Service	1	0.21
Small Business Administration	2	0.43
Department of the Treasury	4	0.85
United States Courts	2	0.43
United States Customs and Border Protection	1	0.21
United States Citizenship and Immigration Services	23	4.69
Department of Agriculture	1	0.21
Office of the United States Trade Representative	1	0.21
Wage and Hour Division	4	0.85
Total	470	100%

Appendix D: Intersectional Advocacy – Examples

The text boxes below provide examples of intersectionally-oriented public comments from the data. Each example directly references the interests of an intersectionally marginalized constituency and provides corresponding policy recommendations (underlined). As described in the main text, both characteristics were required for the positive identification of a public comment containing intersectional advocacy in the data.

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, <u>may limit the competition by those small businesses owned by socially and economically disadvantaged women</u>...
>
> 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. <u>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</u>."

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 <u>tribal members with disabilities</u> 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 <u>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 are a large number of tribes with members who would best benefit from structured cultural activities and services</u>."

Appendix E: Perfectly Matching Phrase – Example

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

Public Comment from CARD:

"…shall not provid services <u>discrimin program beneficiari prospect program beneficiari basi religion religi belief refus hold religi belief refus attend particip religi practice</u>."

Final Rule by VA:

"…shall not, provid servic outreach activ relat services <u>discrimen program beneficiari prospect program beneficiari basi religion religi belief refus hold religi belief refus attend particip religi practice</u>."

Appendix F: Summary Statistics – Key Variables (Original Forms)

Variable	Mean	Min.	Max.	Std. Dev.	Obs.
Lobbying influence	51.08	0	741	92.88	206
Financial capacity	9,428,343	0	185,000,000	18,900,000	470
Proposed rule salience	43,570	0	2,682,626	238,096	470
Proposed rule-comment similarity	66.39	0	2,085	170.08	206
Comment length	2,264.55	0	41,140	4,059.05	470

Appendix G: Model 1 – Regression Table

DV: **Intersectional Advocacy**	1
Man of Color	0.464
	(0.289)
Woman of Color	1.153*
	(0.590)
White Woman	0.984**
	(0.399)
Financial Capacity	0.063**
	(0.025)
Intersectional Mission	0.257
	(0.472)
Paying Membership	-0.335
	(0.566)
Proposed Rule Salience	0.122**
	(0.060)
Proposed Rule Complexity	0.118
	(0.123)
N	175
R^2	0.21

** $p < 0.05$; * $p < 0.1$

Appendix H: Model 2 – Regression Table

DV: **Intersectional Lobbying Influence**	1
Man of Color	0.379
	(0.693)
Woman of Color	-0.518
	(0.744)
White Woman	-0.473
	(0.792)
Financial Capacity	0.077**
	(0.037)
Proposed Rule Salience	-0.115
	(0.126)
Proposed Rule Complexity	-0.065
	(0.144)
Proposed Rule-Comment Similarity	0.717**
	(0.133)
Comment Length	-0.186
	(0.215)
N	66
R²	0.53

** $p < 0.05$; *$p < 0.1$

Appendix I: Model 1, without Tribes – Regression Table

DV: Intersectional Advocacy	1
Man of Color	0.870
	(0.593)
Woman of Color	4.349***
	(0.769)
White Woman	1.082**
	(0.501)
Financial Capacity	0.033
	(0.031)
Intersectional Mission	0.802
	(0.545)
Paying Membership	0.109
	(0.704)
Proposed Rule Salience	0.177
	(0.124)
Proposed Rule Complexity	-0.426
	(0.428)
N	70
R^2	0.34

*** $p < 0.01$; ** $p < 0.05$; *$p < 0.1$

Appendix J: Means Comparison of Model 2 Data with and without Tribes

Data	Mean of Intersectional Lobbying Influence
All Data	2.78
Tribes Excluded	2.86