

Tribal Coalitions and Lobbying Outcomes: Evidence from Administrative Rulemaking

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Abstract

American Indians are among the most under-represented, yet heavily regulated, groups in national politics. While tribal nations maintain statuses as sovereign governments, they, and their people, remain affected by national policies addressing their treaty, land, resource, and civil and political rights. Theories of American Indian political incorporation suggest that Native tribes thus deploy interest group tactics to maintain or achieve favorable policy outcomes. We argue that *coalition building*, a ubiquitous lobbying strategy, uniquely enhances tribal policy advocacy and that “Native-dominant” coalitions – those in which tribal interests comprise a majority of members – are more influential than their more interest-diverse counterparts. We test these claims using data from administrative rulemaking and find support for our hypotheses. We conclude that the unique particularities of tribal advocacy distinguish Native coalitions from those of other groups, and that their strategic lobbying choices may mediate representational disparities in policymaking by the executive branch.

American Indians are among the most under-represented, yet heavily regulated groups in national politics. On average, they are subject to roughly 2,000 more regulations than American citizens (see Cohen 1953), and scholars often describe the relationship between the federal government and American Indians as “bureaucratic imperialism” (see Crepelle 2021, p. 566). In an effort to resist further regulation and retain the rights of their governments and members, Native tribes often engage in state- and national-level political advocacy. They make campaign contributions and independent expenditures, offer committee testimony, mobilize American Indian voters, and contribute to notice-and-comment rulemaking (Boehmke and Witmer 2012; Carlson 2021; Carpenter 2017; Cowger 2001; Hoxie 2012; Viola 1995; Wilkinson 2006). The passage of the Indian Gaming and Regulatory Act of 1988 (IGRA) provided many tribes with the resources to significantly expand the scope and viability of these efforts; Native tribes now comprise over 40 percent of the population of national social, racial, and economic justice-oriented lobbying registrants and since 1978, American Indian lobbying has increased by *600 percent* (Carlson 2022; Dwidar 2022b).

These statistics reflect a growing reality: that tribal lobbying provides one of the only viable sources of political representation for Native interests. Despite substantial political needs – American Indians maintain one of the highest poverty rates in the United States, at 26 percent – they have significantly lower rates of descriptive and substantive representation in government compared to other racial/ethnic minority groups (Corntassel and Witmer 1997; Stubben 2006; Witmer et al. 2014; Wilkins and Stark 2010; Witmer and Boehmke 2007). In the 117th Congress, for example, only five representatives are of American Indian heritage; in contrast, 59 congressional seats are currently held by Black representatives, 46 by Latinx representatives, and 17 by Asian American representatives (Schaeffer 2021). American Indians also have little impact on the voting behavior of their representatives – the presence of a tribal

government in a given district has no effect on roll-call voting behavior – and Native candidates for office struggle to consistently form winning electoral coalitions (Conner 2014; Turner 2005). Scholars have attributed these trends to limited American Indian participation in electoral politics, due to the belief that formal political participation undermines tribal sovereignty (LaVelle 2011; Oeser 2010). Dominant theories of American Indian political incorporation thus argue that Native tribes view lobbying, a form of diplomacy, to be a preferable and more advantageous approach to achieving representation (Witmer and Boehmke 2007).

Existing research on this subject has largely sought to understand the history and motivators of tribal lobbying in the post-IGRA era. Scholars have argued that across state and national political contexts, tribes are emergent contenders with unique political and policy expertise (Carlson 2019; Evans 2011). These works report that tribal lobbying is driven by a number of factors, including gaming compacts, resources, and population rates and levels of education among members (Corntassel and Witmer 2008; Boehmke and Witmer 2012, 2020; Stubben 2006). A small but growing body of research has explored the *outcomes* of tribal advocacy. Carlson (2022), for instance, demonstrates that Native nations can successfully influence federal policymaking, and that tribal interests are most likely to achieve their goals when working in unison with other tribes. Notably, this research has largely focused on the scope and outcomes of legislative lobbying. A great deal of Native political advocacy, however, targets an equally consequential policymaking setting: administrative rulemaking by the executive branch (Dwidar 2022b).

We propose that a ubiquitous lobbying strategy, *coalition building*, is foundational to understanding tribal lobbying outcomes in the administrative setting. Native tribes have a long history of collaboration (Wilkins and Stark 2010). For example, the Haudenosaunee Confederacy, which far predated the U.S. Constitution, united the Mohawk, Oneida, Onondaga, Cayuga, and Seneca Nations to promote unified decision-

making on issues affecting the five member nations (Evans et al. 2020). Similarly, the All Pueblo Council of Governors was created in 1680 to unify twenty Pueblo nations in resisting Spanish colonizers (Evans et al. 2020). In modern politics, this behavior endures – across policy issues and political contexts, Native nations build coalitions at high rates to achieve shared social and political goals (Dwidar 2022b). We argue that coalition work increases the lobbying influence of Native tribes, and that tribal coalitions in which Native interests dominate – those in which they comprise a majority of members – yield greater influence over administrative policy outcomes. We theorize that these dynamics stem from increasingly costly and competitive lobbying environments, along with Native-dominant coalitions’ unique capacities to send signals of consensus and informational credibility to policymakers.

We test these claims using a novel dataset of administrative lobbying efforts from 50 Native nations and tribal organizations between 2010 and 2014. Like traditional interest groups, Native tribes regularly lobby administrative agencies, often through the submission of public comments on proposed federal agency rules. We identify their coalitional efforts through cosignature patterns within these documents, and use plagiarism detection software to operationalize tribal coalitions’ influence through the extent to which each collaboratively submitted comment’s language overlaps with that of its corresponding final rule. We connect these measures to hand-coded characteristics of each tribe and coalition observed in the data.

We find that Native interests, like traditional groups, bear significantly greater influence over administrative policymaking when they lobby in coalitions. Further, in contrast to prevailing research highlighting the value of diversity in coalitional strategy, we find that tribal collaborations in which Native interests comprise a majority of members are significantly more influential than those in which they do not. We suggest that the unique particularities of tribal lobbying – in which consensus from an organizationally homogeneous coalition may send a powerful message of unification –

sets their collaborative behavior apart from other groups. More broadly, we conclude that tribal interests' strategic lobbying choices may serve to mediate representational disparities in policymaking by the executive branch.

Theoretical Foundations and Argument

Native nations have great cultural and political diversity, each with unique histories and responses to colonial and governmental pressures ([Krausová 2020](#); [O'Brien 1989](#); [Wilkins 2003](#)). Today, their members comprise just under three percent of the U.S. population and are geographically dispersed across the American states ([Carlson 2022](#)). They fight daily for autonomy and self-determination, often existing in a liminal space where they are subject simultaneously to government oversight whilst being recognized as independent nations ([Krausová 2020](#); [Strakosch 2015](#); [Wadsworth 2014](#); [Washburn 2006](#)). Their positions as pre-constitutional sovereign governments require their distinction from other non-majority groups and necessitate greater scholarship examining their relationships with federal and state governments, particularly in the lobbying context ([O'Brien 1989](#); [Wilkins and Stark 2010](#)).

Administrative Policymaking and Organizational Advocacy

Before proceeding, it is important to offer an overview of the policymaking context in which we examine Native advocacy. Administrative rulemaking composes the vast majority of national policymaking activity – approximately 90 percent of all U.S. law is of agency, rather than legislative, origin ([Warren 2018](#)). This statistic is no coincidence; as conditions of polarization have gridlocked the U.S. Congress, substantive policymaking has decreased and legislative language has grown increasingly vague ([Jones et al. 2019](#); [Lewallen 2020](#)). In turn, modern policymaking authority

has largely been displaced to the federal bureaucracy, where agents of the executive branch draft and issue rules implementing provisions of the law (Lewis 2010; Potter 2019). As a consequence, a large proportion of national-level lobbying – both tribal and non-tribal – targets a federal agency (Dwidar 2022a,b).

Scholars have traditionally conceived of the relationship between the federal bureaucracy and advocacy organizations as one in which groups partner with Congress to govern bureaucratic policymaking (McCubbins and Schwartz 1984; McCubbins et al. 1987, 1989; Epstein and O’Halloran 1996, 1999). However, interest groups often serve as vital sources of power and information for federal agencies (Truman 1951; Schattschneider 1960; Olson 1965; Berry 1989; Salisbury 1992; Baumgartner and Jones 1993; Gray and Lowery 1996; Baumgartner and Jones 1993; Baumgartner et al. 2009b). They are active players in the administrative venue; the majority of all organizational advocacy targets a federal agency, and their work helps bureaucrats to sway public opinion (Hrebendar 1997), raise awareness of policy issues facing agencies (Rourke 1984; Hrebendar 1997), resist political control (Carpenter 2002), secure budgets (Berry 1989), and even craft regulatory language (Haeder and Yackee 2015).

Thus, a growing body of research has sought to understand the independent relationship between interest groups and the bureaucracy. This work has established that interest groups directly assist the bureaucracy by providing expert consultations and information, and, through doing so, often successfully shape its policy outputs (Cropper et al. 1992; Hrebendar 1997; Golden 1998; Yackee and Yackee 2006a; McKay and Yackee 2007; Yackee 2012; Nelson and Yackee 2012; Haeder and Yackee 2015). This sharing of expertise allows bureaucrats to identify problems with proposed regulations and, when there is consensus among interest groups (particularly those with diverse constituencies), agencies are better able to use their recommendations to alter their regulatory direction (Croley 1998; Golden 1998; McKay and Yackee 2007; Nelson and Yackee 2012).

Further, the role of judicial review in agency policymaking is critical to interest group influence in this venue. By law, all agency rules are subject to judicial review. This mechanism exists to ensure that agency efforts both adhere to their legislative mandates and follow all procedural requirements. In executing judicial reviews of agency rules, federal courts have required the bureaucracy to maintain meaningful written records of their rulemaking processes (encompassing proposed and final rules, public comments, and relevant studies or data) in order to enhance bureaucratic responsiveness to public participants in rulemaking (Seidenfeld 1997; Magat et al. 1986). This ongoing threat of potential court action, as well as courts' reliance on the written record, have both incentivized agencies to address contributions by outside groups in rulemaking and provided greater opportunities for these groups to influence agency decisions (Chubb 1983; West 1984).

Tribal Lobbying Activity

A growing body of research has documented tribal political activity over the last several decades. These works highlight a fundamental tension: that traditional political participation, such as seeking and holding non-tribal office, remains contested within tribal communities (Carlson 2022). While turnout by American Indian voters has increased substantially in recent election cycles (see Sanchez 2021), some tribal leaders, advocates, and scholars argue that such participation undermines tribes' designations as sovereign governments (LaVelle 2011; Oeser 2010). Instead, scholars have observed that tribes and their members often seek political representation through diplomacy, using interest group tactics such as lobbying government officials and testifying before Congress to advocate for their rights (Carpenter 2017; Hoxie 2012; Wilkinson 2006). Indeed, Native tribes, American Indian non-profit organizations, tribal consortiums, and tribal businesses routinely leverage traditional interest

group techniques to influence policymaking across levels and branches of American government (Boehmke and Witmer 2012, 2020).

These efforts have been largely facilitated by the passage of IGRA, which established a statutory basis for tribes' abilities to engage in gaming free from state regulation.¹ In doing so, it protected gaming as a means of generating revenue for tribes, and thus provided many with the financial resources to engage in national politics. Since IGRA's implementation, Native tribes and their representatives have become active and influential players in American lobbying, regularly making independent expenditures, offering campaign contributions, contributing committee testimony, participating in administrative rulemaking, and mobilizing Indian voters (Boehmke and Witmer 2012, 2020). Yet, we have little knowledge of tribal lobbying strategy and the outcomes of tribal advocacy efforts. Scholars of tribal politics have attributed this gap, in part, to the limited engagement of work on interest group politics with Native tribes. Carlson (2022), for instance, notes that the seminal work of Baumgartner et al. (2009a) – widely considered to be one of the most comprehensive studies of American lobbying – excludes Indian policy issues and tribal lobbies from their analysis. Dwidar (2022b) observes that even among research seeking to understand lobbying by social and economic justice organizations, Native interests are often either entirely neglected or collapsed into a broader category of “racial/ethnic minority” groups.

However, Native tribes have engaged in interest group tactics for decades. Organized advocacy on behalf of tribes and their members typically takes place through the work of tribal governments, inter-tribal organizations, and pan-Indian organizations, such as the National Council of American Indians (NCAI, established in 1944) (Nagel 1982; Witmer and Boehmke 2007). Several factors drive this activity. Tribes with gaming compacts are more likely to register to lobby (Boehmke and Witmer 2020). Those with higher levels of education among their members, greater monetary

¹<https://www.everycrsreport.com/reports/R42471.html>

resources, and larger populations all lobby at high volumes (Boehmke and Witmer 2015, 2020). Substantively, their advocacy often focuses on intergovernmental relationships, gaming, and natural resource policy (Deloria 1969; Kymlicka 1995), though their agendas are typically more diverse than those of other interest groups (Carlson 2021; Wilkins and Stark 2010; Witmer et al. 2014). Tribal interests are also more likely than other types of groups to lobby in favor of, rather than in opposition to, legislation (Baumgartner et al. 2009a; Carlson 2022).

Tribal Coalitions and Administrative Rulemaking

In pursuit of their advocacy goals, Native interests often turn to a popular lobbying strategy: coalition building. Lobbying coalitions – defined as any coordinated effort by more than one group to lobby a branch of government as a *team* – are ubiquitous in American politics (Junk 2019; Mahoney 2007; Nelson and Yackee 2012; Schlozman and Tierney 1986). Approximately 40 percent of mainstream lobbying and 30 percent of lobbying by social, racial, and economic justice organizations occurs in coalitions (Dwidar 2022a,b). Moreover, over 80 percent of interest groups consider coalition work to be effective for policy influence (Hula 1999). However, coalition building is complex, and scholars have vigorously debated its strategic value. Their arguments largely fall into two camps: the first camp, argues that coalitions are unlikely, since organized interests require autonomy to survive and coalition building presents inherent risks to autonomy (Wilson 1973; Berry 1977; Browne 1990), and the second camp, that coalitions are advantageous, because they allow groups to enhance their effectiveness in a crowded political environment (Salisbury 1990; Hojnacki 1997).

Regardless, lobbying coalitions *do* form, for a myriad of reasons. Hula (1999), for example, reports that groups with policy-oriented goals regularly join coalitions in or-

der to reduce expenditures, shape policy proposals, and define issue debates. Others do so to obtain insider information or to publicly demonstrate allyship (Hula 1999). Hojnacki (1997) observes that when groups “pivotal to success” join a coalition, the likelihood of others joining increases. The policy environment also plays a role; when opponents in a policy debate are strong, groups are more likely to coalesce and derive greater benefits from collaboration (Hojnacki 1997). While coalition building certainly comes at some cost – collaboration requires compromise – on the whole, the opportunity to coalesce often presents groups with benefits that outweigh these costs, such as access to broader networks and new contacts, greater political information, tactical and policy expertise, and the ability to signal consensus and credibility (Lorenz 2019). Moreover, a growing body of research has demonstrated that coalition work is effective for achieving lobbying goals. McKay and Yackee (2007), Baumgartner et al. (2009a), Nelson and Yackee (2012), Phinney (2017), and Lorenz (2019) observe positive relationships between collaborative lobbying and policy influence, and note that certain characteristics – like coalition size, consensus, and composition – can magnify the impact of coalition work.

For groups representing historically under-served communities, coalition work offers a doubly valuable opportunity (Strolovitch 2006, 2007). Organizational advocates for politically stigmatized and excluded groups often face extra- and intra-organizational constraints (Imig 1996; Staggenborg 1986). These groups struggle to gain access to formal political institutions and have fewer members, smaller budgets, and more limited advocacy agendas than their private and professional counterparts. Consequently, they often focus their lobbying on broad-based, “winnable” advocacy issues – at the expense of their most vulnerable constituents (Marchetti 2014). Coalition work, which minimizes lobbying costs whilst expanding organizational reach, provides them with a chance to mediate these inequalities. For instance, social and economic justice organizations are significantly more likely to pursue intersectional

advocacy – advocacy on behalf of multiply disadvantaged constituents – under conditions of collaboration, and more likely to influence policy outcomes when lobbying in diverse coalitions (Dwidar 2022b).

For Native interests, coalition building offers a similar opportunity. Despite financial gains achieved since the passage of IGRA, most tribes and tribal advocates still face resource limitations (Boehmke and Witmer 2020). Additionally, due to long histories of marginalization, tribal advocacy often opposes status quo political arrangements and must work to counter stigmatized policy images and frames (Krausová 2020). Developing policy proposals that effectively respond to these histories and contexts is an arduous and expensive task (Dwidar 2022b). Coalitional advocacy, however, may offer tribes an opportunity to more effectively pursue this work. By working with others, coalitions may allow Native advocates to gain access to a wider variety of resources – financial, tactical, political, and expert – and may thus collectively produce more informed and durable policy ideas. In the administrative setting, the focus of this paper, ideas of this nature are of great value. Due to unique incentives – agency bureaucrats are highly professionalized and conflict avoidant – administrative policymakers typically seek the best implementation protocol of the provisions of the law they have been tasked with regulating (Potter 2019; Workman 2015). Indeed, prior research has demonstrated the value of high informational content in administrative advocacy (McKay and Yackee 2007; Yackee and Yackee 2006a). Thus, we argue that coalition building increases the administrative lobbying influence of Native tribes (*Hypothesis 1*).

However, not all coalitions are created equal. Existing research has demonstrated that the composition of coalitions also contributes to lobbying outcomes. For instance, Phinney (2017), Lorenz (2019), and Dwidar (2022a; 2022b) report that coalitions of “strange bedfellows” enjoy greater lobbying influence due to their ability to garner public and government attention and leverage a diverse range of informational sources.

In the Native context, there is some evidence to suggest that coalition composition may also relate to policy influence. In her 2022 work, for example, Carlson reports that when Native interests uniformly oppose congressional legislation, they are significantly more likely to achieve their stated goals. This finding highlights a unique dynamic in tribal advocacy: that contrary to prevailing theories, *inter-tribal coalitions* – rather than coalitions that unite many different types of organizations – may be uniquely influential policy advocates. These collaborations, which have long histories and bridge distinct cultures, practices, and knowledge bases, have been speculated to be “vital” for solving critical Native political and policy challenges (Bang et al. 2018). Their formation, too, is no small feat: historically, Native nations have acted autonomously, gone to war with one another, allied with one another, and developed separate relationships with state and federal governments (Carlson 2019; Krausová 2020). Their unification may thus send a powerful message to policymakers – communicating both credibility and consensus, and signalling “where the bulk of support lies” (Mahoney 2007). Thus, we argue that tribal coalitions in which Native interests dominate – those in which they comprise a majority of members – yield greater influence over administrative policy outcomes than their more diverse counterparts (*Hypothesis 2*).

Data

We test these hypotheses by collecting data on administrative lobbying efforts by a sample of Native tribes and tribal organizations active in national politics. We identify instances of coalition building using co-signature patterns on public comments submitted on proposed federal agency rules during their notice-and-comment periods. We measure the influence of tribal lobbying by using plagiarism detection software to determine the degree to which each comment’s language overlaps with

that of its corresponding final rule. We then connect these measures to hand-coded characteristics of each tribal interest and coalition observed in the data.

Administrative Rulemaking

Administrative policymaking is governed by the Administrative Procedure Act of 1946 (APA) and derives from the lawmaking authority of Congress and the President. The APA dictates that upon passage by both chambers of Congress and approval by the President, provisions of new law must be sent to the appropriate 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” – detailing and explaining their preferred implementation procedure – for specified notice-and-comment periods. During these periods, any public entity, including private citizens, political actors, and interest groups, may submit public comments expressing their opinions on the draft rule. These opinions may simply express support or disapproval, or make suggestions for improving the regulatory content. These comments are a critical source of information for federal agencies, as commenters often have high levels of expertise in the subject area of the rule.

Second, upon closure of the notice-and-comment period, agencies must review every comment received and issue a written response. These written responses are published along with the final rule, and explain the agency’s rationale for incorporating or disregarding the comment’s recommendations. Existing research holds mixed positions on the value of these periods – scholars of bureaucratic politics note that since agencies often publish draft rules in a near-final form, comments received during the subsequent periods will have little sway. Thus, they suggest that commenters largely engage with these periods in order to pursue judicial review at a later point

in a rule’s lifespan. Scholars of interest group politics, however, have suggested that threat of judicial review of agency rules incentivizes bureaucrats to consider all public comments received in good faith (see Magat et al. 1986 and Seidenfeld 1997), and a large body of research has found evidence of comment influence during the notice-and-comment period (McKay and Yackee 2007; Nelson and Yackee 2012; Yackee 2006, 2012; Yackee and Yackee 2006b). Scholars have also observed that interest groups submit the vast majority of comments received during these periods, and that “privileged” interest groups do not dominate influence during these periods (Croley 1998; Golden 1998; West 2004; Nixon et al. 2002; Kerwin et al. 2011).

Finally, upon sorting through all comments received, agencies begin the task of deciding which recommended changes – if any – it will make to the proposed rule. Importantly, this exercise centers around creating the *best possible* final policy. Agencies do not necessarily follow the majority opinion of commenters. Instead, they search comments for valuable information that will inform their policy choices. They may look for certain signals in comments – such as consensus, or credibility – but their final choices are driven by a desire to develop the best implementation protocol for the provision of law they have been tasked with implementing. After reviewing and incorporating feedback from public comments, agencies send the draft final rule through internal and external clearance processes. Upon receiving clearance, the final rule is published in the *Federal Register* and, after a short waiting period, becomes legally-binding.

Native Group and Rule Selection

We examine 257 public comments submitted by a random sample of 50 Native tribes and tribal advocates active in national politics between 2000 and 2014. This sample was drawn from the population of all Native interests active in national pol-

itics using data provided by the Center for Responsive Politics. We define “Native interests” as all entities that self-identified as primarily advocating on Native American policy issues on lobbying disclosure reports. We define the population of interests “active in national politics” as all those that submitted at least one lobbying disclosure report during the years under study.

Our sample contains a range of tribal interests. Seventy-two percent are Native American tribes and 28 percent are tribal advocacy organizations, Native service providers, and inter-tribal associations. Of those non-tribal members, 12 percent are Native advocacy organizations – groups advocating exclusively on behalf of the interests of American Indians, such as the Association of Village Council Presidents and the National Tribal Environmental Council. Four percent are non-profit service providers, such as the California Rural Indian Health Board and the Karuk Tribe Housing Authority. Finally, four percent are inter-tribal associations, such as the National Council of American Indians and the Association of Village Council Presidents. Table 1 presents a breakdown of the members of our sample by advocate type.

Table 1: Sample Members by Type

Type	Frequency	Percent
Inter-tribal association	4	8.00
Native advocacy organization	6	12.00
Native service provider	4	8.00
Native tribe	36	72.00
Total	50	100%

Among the tribes in our sample, 91 percent are federally recognized and nine percent are recognized by states. Twenty-two percent of tribes in our sample hold self-governance compacts – agreements affirming the existence of a nation-to-nation relationship between a tribal government and the United States government. They range widely in membership, including tribes with large land masses, such as the

Cherokee Nation and the Navajo Nation and smaller tribes, such as the Lumbee Tribe and the California Valley Miwok Tribe. Table 2 presents a breakdown of the tribes in our sample by geographic location. All major “cultural areas” are present, meaning that the sample includes a plurality of Native traditions, habitats, and regions. A list of all tribes and tribal advocates appearing in our sample is available in [Appendix A](#).

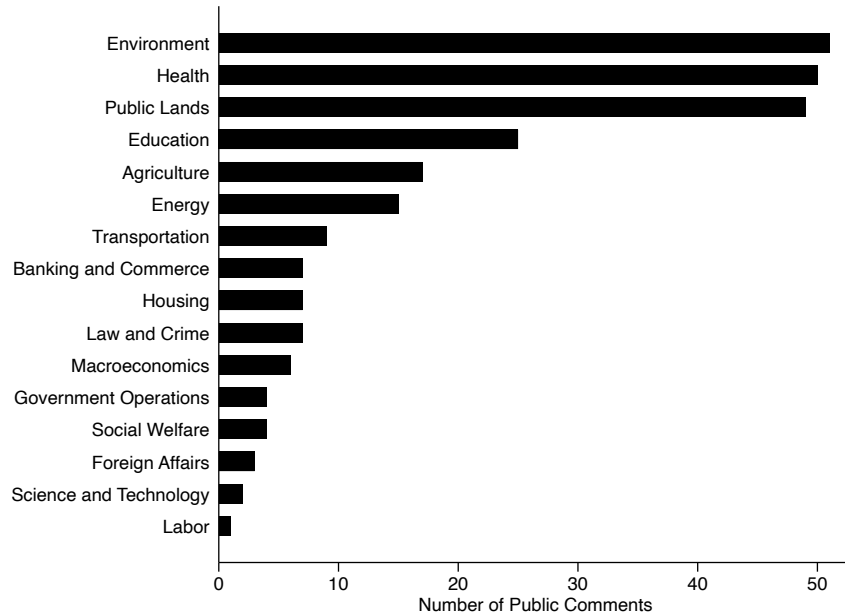
Table 2: Tribes by Cultural Area

Region	Frequency	Percent
California	6	16.66
Great Basin	2	5.55
Northeast	10	27.77
Northwest	4	11.11
Plains	4	11.11
Plateau	1	2.77
Southeast	3	8.33
Southwest	6	16.66
Total	36	100%

The public comments we examine were submitted on 136 rules proposed by 36 federal agencies.² These agencies span a range of policy specializations and sizes – from the Administration for Children and Families to the Food and Nutrition Service to the Centers for Medicare and Medicaid Services. They also contain a mix of independent (16 percent) and executive branch (84 percent) agencies. [Appendix B](#) provides a list of the agencies appearing in the data. The agency rules under consideration also span a range of policy subjects. Sixteen out of the 21 major topics proposed by the Policy Agendas Project’s (PAP) common policy coding scheme are present, as illustrated by Figure 1.

²Approximately 3,000 rules are published yearly in the Federal Register, the official publication for activities of the federal bureaucracy, and there are between 250 and 400 federal agencies in existence (Administrative Conference of the United States, *Sourcebook of United States Executive Agencies*, 2012).

Figure 1: Proposed Agency Rules by Policy Topic



The majority of public comments in the data address proposed rules addressing issues of environmental, health, and public lands policy. These trends reflect patterns in the population under study and policy context, as Native tribes have unique interests pertaining to environmental and land regulation, and as education reform was ubiquitous on the national policy agenda during our period of study. The proposed rules are also characterized by ranges of public salience and technical complexity. They include straightforward, low-salience proposals, such as a 2010 Tribal Economic Development Bond provision in the Internal Revenue Code, as well as more technical and salient efforts, such as a proposed rule regulating hydraulic fracturing on Federal and Indian land in 2012 which received over one million public comments.

Collecting and Preprocessing Comments and Rules

To collect the set of all public comments submitted by the Native interests in our sample, we relied on Regulations.gov’s interactive Application Programming In-

terface (API). Our procedure required four steps: First, we built queries to call all public comments submitted by each tribe and organization in the sample. We specified parameters for docket type (rulemaking), received date range (January 1, 2004 to December 31, 2014), and keyword (name of the tribe or group). We then read each comment returned by each query and removed false positive results.³ Next, we used optical character recognition (OCR) software to transcribe each public comment, which we supplemented with manual transcription and error-correction where necessary. Finally, to facilitate the text analytic portion of our analysis, we preprocessed all public comment and regulatory documents. This procedure, in line with standard conventions for text analysis, involved the conversion of all words to their stems⁴ and removal of stop words⁵, figures, graphics, appendices, and capitalization (Grimmer and Stewart 2013).

Dependent Variable

We investigate one dependent variable in this paper: the *influence* of tribal lobbying. To operationalize this variable, we leveraged modern text analysis tools. We compared the text of each comment submitted by a tribe or tribal organization to that of its corresponding final rule and produced a measure of global textual similarity between the documents. We produced this measure using WCopyfind, a plagiarism detection software that compares textual documents and reports similarities in their

³The Regulations.gov API only allows for free-text searches, rather than searches by comment author. Thus, the above-mentioned queries yielded all public comments in which a given interest group was *mentioned*, rather than all comments *authored* by a given group. For reference, the initial queries returned approximately 2,400 comments, of which 257 had been submitted by the groups in our sample.

⁴A “stem” is the root of a word remaining after suffixes are removed. For example, the words “traveling”, “traveled”, and “traveler” share the same stem: “travel”. Stemming words in a corpus allows for the grouping of words that share a substantively common meaning, but may differ superficially.

⁵Stop words are words that serve a grammatical purpose and do not otherwise convey meaning. Examples include “a”, “but”, “and”, “how”, “or”, and “what”.

words and phrases. WCopyfind allows users to edit the package’s comparison rules before use. We adopted the following comparison rules, designed to detect all *perfectly matching* phrases between comment-final rule document pairs.⁶ We then computed the total number of words contained in all perfectly matching phrases between document pairs – our final operationalization. This variable spans a wide range, from 0 to 564 (mean = 45; standard deviation = 76).⁷

- Shortest phrase to match⁸: 6 words
- Most imperfections to allow⁹: 2
- Minimum percent of matching words¹⁰: 100%
- Skip non-words¹¹
- Skip words longer than 20 characters¹²

Independent Variables

Our key predictor variable is the *coalition status* of a given comment. We operationalized this variable by examining the signature line of each public comment in our data – if the comment was signed by more than one group, we assigned this variable a value of 1. Otherwise, we assigned it a value of 0. We then used this variable to produce two measures of coalition composition: for all coalitions observed in the data, we produced a binary variable indicating the presence of a “*Native-dominant*” coalition – any coalition in which Native interests comprised 50 percent or more of coalition members – and a variable measuring the *proportion of Native interests present in*

⁶These decision rules were informed by the existing 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).

⁷See [Appendix C](#) for an example of a perfectly matching phrase identified using this approach.

⁸Minimum string length considered to be a match.

⁹Maximum number of non-matches allowed between perfectly matching portions of a phrase.

¹⁰Minimum 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.

¹¹Words containing any characters other than letters, except for internal hyphens and apostrophes.

¹²Often non-textual items, including filenames, URLs, or image data.

a coalition. Here, following a convention introduced by Carlson (2022), we defined Native interests broadly, including Native nations, inter-tribal associations (e.g., the Columbia River Inter-Tribal Fish Commission), Native-owned corporations (e.g., the Calista Corporation), and non-profit Indigenous service providers or advocacy organizations (e.g., the National Congress of American Indians).

Beyond these key variables, we also collected a number of secondary control variables. First, we collected data on the *financial capacity* of each member of the sample. As we describe earlier, advocacy on behalf of historically marginalized communities is often more effective when lobbying entities have greater financial resources. Thus, to account for this dynamic in our analyses, we recorded each tribe or tribal advocate's total lobbying spending (dollar amount) in the year of comment submission. We collected these data from information made available by [Center for Responsive Politics](#). This variable ranges from 0 to 19,000,000 (mean = 318,694; standard deviation = 1,444,418). As an additional measure of capacity, we also recorded the *size* of each coalition, operationalized through its total membership (mean = 5, standard deviation = 23). Solo-authored public comments were recorded as having a membership of one.

Second, we collected information on the salience of each proposed rule in the data. Proposed agency rules vary substantially in the degree of visibility and attention that they receive. When proposed rules are of greater consequence, or when they are relevant to a broader audience, more actors may attempt to debate their content, often by submitting public comments. In these more competitive and costly environments, Native advocacy efforts may be less influential. To account for this possibility, we operationalized the *salience of each proposed rule* through the total number of public comments submitted in response to the rule. This variable spans a wide range, from 1 to 1,348,451 (mean = 35,721; standard deviation = 171,545).

Third, we collected information on the complexity of each proposed rule. More complex public policies often span multiple constituencies and policy topics. Under these conditions, Native interests may be more influential. As executive branch officials navigate complex policy design, they often turn to external actors to fill informational gaps. In these environments, due to their reputations as “vital” in solving critical Native political and policy challenges, Native advocates may have a unique advantage (Bang et al. 2018). To account for this potential relationship, we operationalized the *complexity of each proposed rule* through the total number of distinct policy sub-topics encompassed by the summary of each proposed rule.¹³

Fourth, we developed a measure of *proposed rule-public comment similarity*. Final rules almost certainly contain a proportion of text from their original proposed rules. Public comments often quote language from the proposed rules they seek to influence. They may do so either as a point of comparison to their own recommendations or to direct bureaucrats to the sections of the proposed rules they reference. Importantly, this quoted language may remain in the final rule, and may thus contribute to an over-estimation of our dependent variable. To address this potential measurement concern, we computed this measure using the same methodology used to compute our dependent variable.

Finally, public comments that contain more text are likely to share more language with the final rule. To account for this simple, but likely, relationship, we recorded the *length of each public comment*. We operationalized this variable through the total number of words contained in each comment after preprocessing. This variable spans a wide range, from 25 to 41,140 (mean = 2,033; standard deviation = 3,782).

¹³We executed this coding procedure using the [Policy Agendas Project](#)’s common policy coding scheme and coding guidelines.

Summary Statistics and Empirical Strategy

Of the 257 public comments in the data, 18 percent were submitted by coalitions. Fifty-four percent of these coalitions were *formal* in nature – coalitions with separate organizational structures, staff, and fixed memberships. Seventy-eight percent of Native coalitions consisted predominantly of tribal interests. Table 3 presents a breakdown of the rate of coalition building in the data, grouped by the members of our sample’s advocate type. As illustrated, Native nations are responsible for the vast majority of coalitions observed in the data, at nearly 60 percent. Native advocacy organizations compose 28 percent of coalitions, while inter-tribal associations and Native service providers form coalitions at more modest rates, composing approximately eight and four percent of collaborations, respectively.

Table 3: Coalition Building by Sample Member Type

Type	Frequency	Percent
Inter-tribal association	4	8.69
Native advocacy organization	13	28.26
Native service provider	2	4.35
Native tribe	27	58.69
Total	46	100%

Table 4 presents summary statistics for each of the key variables^{14,15}. Here, it is important to highlight one aspect of the data. As illustrated in Table 4, the number of observations for all lobbying influence-related variables is smaller than the number of observations contained in the broader dataset. This characteristic is reflective of a key aspect of the nature of bureaucratic policymaking. The notice-and-comment pro-

¹⁴Due to the wide variance characterizing lobbying influence, financial capacity, proposed rule salience, and comment length, their natural log(s) were adopted in the analyses below.

¹⁵Notably, because the lobbying 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 D](#) contains a table with these same summary statistics for the original operationalizations of these four variables.

cess often takes years to resolve and in some cases, proposed rules may be withdrawn by their issuing agencies (Potter 2019). As such, not all public comments in the data correspond to a published final rule – required for the measurement of our secondary dependent variable and related control variables. The data appearing in analyses containing these variables are thus limited by this characteristic. Additionally, data on coalition composition were not collected and coded for every coalition observed. To control for the appearance of superficial/symbolic coalitions, which typically contain hundreds of members, we collected and coded this variable only for coalitions containing fewer than 51 members.¹⁶ The data appearing in analyses containing this variable are thus also limited by this characteristic.

Table 4: Summary Statistics, Key Variables

Variable	Mean	Min.	Max.	Std. Dev.	Obs.
Lobbying Influence*	2.56	0	6.35	1.87	133
Lobbying Coalition	0.18	0	1	0.38	257
Native-Dominant Coalition	0.14	0	1	0.35	252
Percent Native Interests	0.14	0	1	0.34	257
Coalition Size	5.37	1	335	23.18	257
Financial Capacity*	11.58	8.27	18.53	2.51	257
Proposed Rule Salience*	5.67	0	14.11	2.83	257
Proposed Rule Complexity	1.57	1	7	1.03	257
Proposed Rule-Comment Similarity	47.71	0	718	79.91	133
Comment Length*	7.03	3.21	10.62	1.02	257

*Logged transformation of original variable

Models

We tested *Hypothesis 1* – the expectation that coalition building increases the administrative lobbying influence of Native interests – by applying an Ordinary Least Squares (OLS) linear regression model with a measure of Native lobbying influence as the dependent variable and indicator of coalitional status as the main predictor

¹⁶The vast majority of coalitions in the dataset contained fewer than 51 members. Of the coalitions observed, 90 percent were submitted by coalitions with fewer than 51 members.

variable.¹⁷ We accounted for coalition size, financial capacity, the salience and complexity of the targeted proposed rules, textual similarity between proposed rule and public comment documents, and public comment length. Additionally, we accounted for potential correlations within the data by clustering the standard errors by group. The relationships of interest can be expressed by the following equation:

$$\begin{aligned}
 \text{NativeInfluence} = & \alpha + \beta_1 \text{Coalition}_i \\
 & + \beta_2 \text{CoalitionSize}_i \\
 & + \beta_3 \text{FinancialCapacity}_i \\
 & + \beta_4 \text{PolicySalience}_i \\
 & + \beta_5 \text{PolicyComplexity}_i \\
 & + \beta_6 \text{CommentLength}_i \\
 & + \beta_7 \text{ProposedRuleSimilarity}_i + \epsilon_i
 \end{aligned} \tag{1}$$

We tested *Hypothesis 2* – the expectation that Native-dominant coalitions yield greater influence over administrative policy outcomes – by applying an OLS linear regression model with a measure of lobbying influence as the dependent variable and the an indicator for “Native-dominant” coalitional status as the main independent variable. We again controlled for coalition size, financial capacity, the salience and complexity of the targeted proposed rules, public comment length, and textual similarity and clustered the standard errors by group to account for potential correlations

¹⁷We model Hypotheses 1 and 2 separately due to concerns of multicollinearity between our two predictor variables of interest.

within the data. These relationships can be expressed by the following equation:

$$\begin{aligned} TribalInfluence = & \alpha + \beta_1 NativeDominant_i \\ & + \beta_2 CoalitionSize_i \\ & + \beta_3 FinancialCapacity_i \\ & + \beta_4 PolicySaliency_i \\ & + \beta_5 PolicyComplexity_i \\ & + \beta_6 CommentLength_i \\ & + \beta_7 ProposedRuleSimilarity_i + \epsilon_i \end{aligned} \tag{2}$$

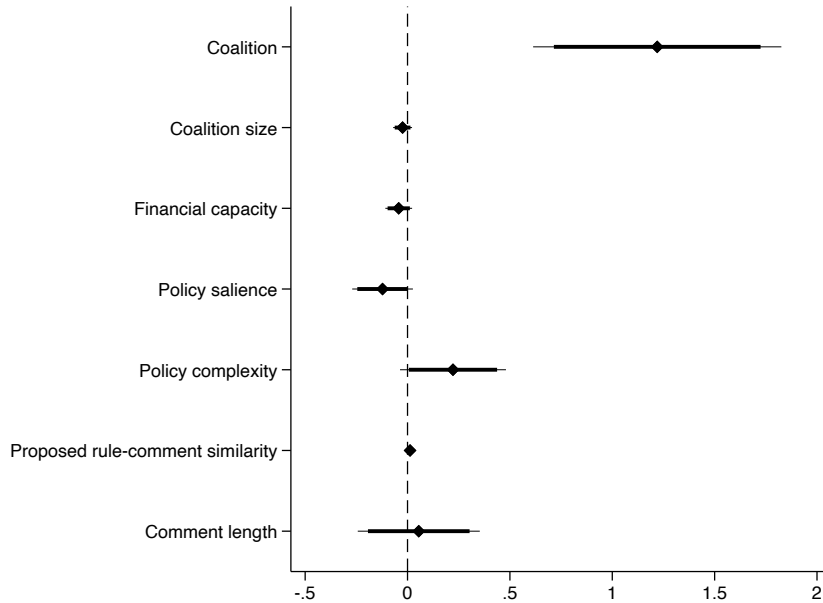
Results

Figure 2, below, presents the results of Model 1.¹⁸ This model assesses whether Native interests are more influential advocates when lobbying in coalitions. It illustrates a key finding: First, there is a positive and significant relationship between coalition formation and lobbying influence, suggesting that Native interests are more influential policy advocates when working in coalitions. More specifically, holding all other independent variables at their means, these results indicate that a shift from “solo” advocacy to coalitional advocacy nearly quadruples the shared word count in perfectly matching phrases between comment and final rule documents (8 to 29 words). This shift may translate, practically, to two additional shared sentences between document pairs, assuming an average sentence length of 10 to 15 words. This effect size has both statistical and substantive significance, as agency rules are extraordinarily technical; even slight changes in their wording – such as a revised standard or an expanded definition – can have profound effects on their implementation. This finding lends support to *Hypothesis 1* and is in keeping with prior research, such as

¹⁸Refer to [Appendix E](#) for the corresponding regression table

Carlson’s (2022) finding that when Native interests unify, they are more likely to shape public policy decision-making.

Figure 2: Tribal Coalitions and Influence – Model 1



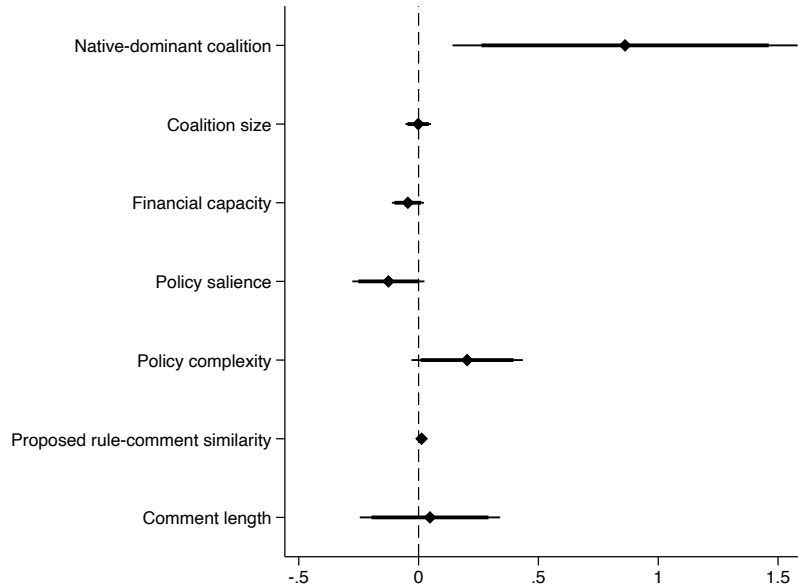
OLS regression model with group-clustered standard errors. $N = 133$. Diamonds indicate coefficient values. Thick lines indicate 90% confidence intervals. Thin lines indicate 95% confidence intervals.

Figure 3, below, presents the results of Model 2.¹⁹ This model assesses whether coalitions in which Native interests comprise a majority of members are more influential advocates than those in which they do not. It illustrates a number of findings. There is a positive and significant relationship between the presence of a “Native-dominant” coalition and lobbying influence, suggesting that Native coalitions that unite a critical mass of tribal interests bear greater influence over policy outcomes than those that do not. Like that of Model 1, this result has substantial practical implications. The results indicate that, holding all independent variables at their means, a shift from solo advocacy or organizationally diverse coalition work to coalition work

¹⁹Refer to [Appendix F](#) for the corresponding regression table

involving a majority of Native partners doubles advocacy influence – moving from 8 to 19 shared words in perfectly matching phrases between comment-final rule pairs. This finding lends support to *Hypothesis 2*.

Figure 3: Tribal and Influence – Model 2



OLS regression model with group-clustered standard errors. $N = 133$. Diamonds indicate coefficient values. Thick lines indicate 90% confidence intervals. Thin lines indicate 95% confidence intervals.

The model’s remaining findings demonstrate associations that are consistent with existing research and theoretical expectations. For instance, we observe a negative and significant relationship between policy salience and lobbying influence, suggesting that Native advocates are less successful when targeting more salient issues. This finding is consistent with our theoretical expectations, along with prior research demonstrating that interest groups are most successful when lobbying on issues outside of the public eye (Mahoney (2007); Witko (2006)). Moreover, policy complexity shares a positive and significant relationship with the dependent variable, suggesting that Native interests are more influential advocates in complex policy contexts. Many issues of concern to Native populations span multiple policy areas – for example, land use policy could

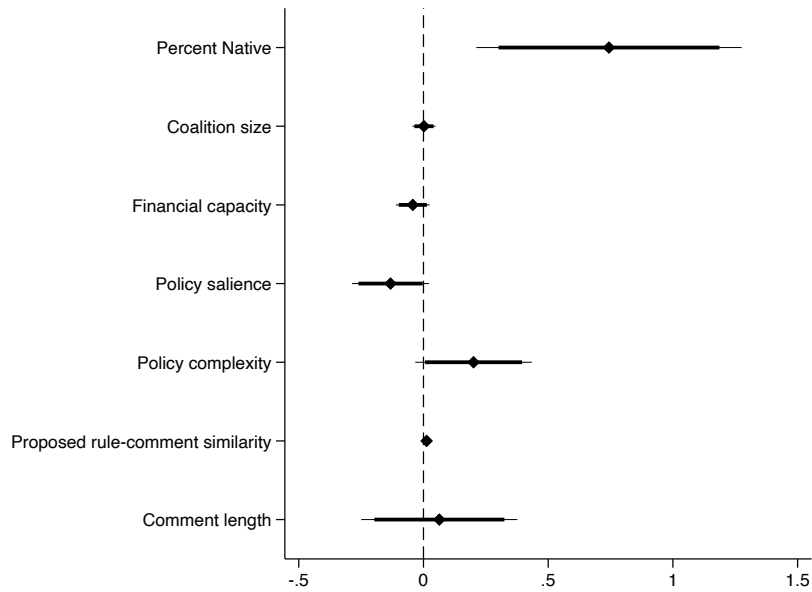
also raise environmental protection and religious freedom issues for Indigenous communities. Thus, this finding is in line with existing research that demonstrates the importance of Native expertise in solving political and policy challenges pertaining to Indigenous peoples (Bang et al. 2018; Carlson 2022).

Alternative Explanations and Discussion

Finally, the reader may wonder whether, in addition to the mere presence of a majority of Native interests, a *greater degree* of Native representation in coalitions is predictive of lobbying outcomes. It may well be the case that as Native interests unify in greater proportions, their influence over policy outcomes is similarly greater. Model 3, below, assesses this expectation using an OLS linear regression model identical to that of Models 1 and 2 in all respects beyond the replacement of the key independent variable, the proportion of Native interests present in a coalition.

This model illustrates a key finding: that as Native unification increases in a coalition, lobbying influence positively and significantly increases. This finding highlights an important dynamic of coalition work. Recent research has found evidence of a ‘threshold effect’ of coalition composition wherein the introduction of diverse interests to coalitions significantly enhances their influence, but greater degrees of interest diversity detracts from it. Scholars have attributed this finding to the practical challenges of collaborating across many distinct interests. In the case of Indigenous advocacy, greater representation of Native interests in coalitions *enhances*, rather than reduces, their lobbying influence. We find this to be true both generally (per Model 3) and when Native interests comprise a majority of coalition members. These findings suggest that Indigenous interests gain unique advantages when uniting with one another to lobby both Congress (Carlson 2022) as well as the executive branch.

Figure 4: Tribal Coalitions and Influence – Model 3



OLS regression model with group-clustered standard errors. $N = 133$. Diamonds indicate coefficient values. Thick lines indicate 90% confidence intervals. Thin lines indicate 95% confidence intervals.

Advocacy by Native interests is critical to the representation of tribal nations and their members in American politics. As we describe earlier in this paper, due to their histories of colonial dominance, Indigenous peoples in the United States face unique, path-dependent, burdens in public policymaking (Krausová 2020). Asserting a voice in these processes is thus vital to the protection of the internal sovereignty of Native nations and basic rights of Indigenous citizens. However, research exploring the manner in which Native interests pursue political advocacy, along with the outcomes of their advocacy, is limited. Scholars of political participation and representation have often grouped American Indian voters and constituents with broader “racial/ethnic minority” groups (Carlson 2021; Krausová 2020) or completely excluded Native interests from their analysis.

A small body of research has begun to explore Native nations’ use of interest

group strategies to pursue their political interests. These works have offered an exemplary foundational understanding of conditions under which tribal interests engage in lobbying. Our research builds upon this scholarship by exploring the value of a common lobbying tactic – coalition building – in tribal advocacy in administrative rulemaking. We find that Native interests, like traditional groups, bear significantly greater influence over administrative policymaking when they lobby in coalitions. Further, in contrast to prevailing research on coalitional strategy, we find that tribal collaborations in which Native interests dominate are significantly more influential than those in which they do not. We suggest that the unique particularities of tribal lobbying – in which consensus from an organizationally homogeneous coalition may send a powerful message of unification – sets their collaborative behavior apart from other groups. More broadly, we conclude that tribal interests’ strategic lobbying choices may serve to mediate representational disparities in policy implementation.

This paper makes several contributions. It offers attention to a critically understudied subject within political science. Historically, political scientists have dedicated little attention to the political experiences of Indigenous peoples, even going so far as to describe them as politically irrelevant ([Krausová 2020](#)). Thus, most publicly available data and published research lack adequate samples of Indigenous peoples and their advocates in government. Our work addresses these shortcomings by developing a unique dataset of tribal political advocacy in administrative rulemaking – an extraordinarily consequential policy process in which Native interests actively engage. Using these data, we are able to draw new conclusions about the patterns and outcomes of national-level tribal lobbying.

Additionally, our key findings significantly extend the scope of the existing literature. While prior work has rigorously explored the role of Native nations and interests in state- and national-level legislative policymaking, our work focuses on their efforts in an under-studied policymaking setting: rulemaking by the executive branch. To

our knowledge, this paper represents the first study of tribal advocacy influence in administrative rulemaking. Thus, our conclusions have both theoretical and practical consequence as executive policy actions have unique consequences for Indigenous communities. The vast majority of tribal interactions with the federal government are facilitated through agents of the federal bureaucracy. As one example, the Indian Health Service (IHS), an operating division within the Department of Health and Human Services (HHS), is responsible for the provision of health and medical services for members of federally-recognized tribes. As such, our lack of understanding of Native advocacy in the bureaucratic context constitutes a major shortcoming across multiple disciplinary subfields. Our work, which establishes a theoretical framework connecting literatures on American Indian political incorporation, lobbying, and coalitional strategy, represents a step toward addressing these shortcomings.

Several questions remain regarding Native lobbying. First, given the nature of our data, we are unable to make inferences regarding the relationship between Native advocacy outcomes and characteristics of different presidential administrations. For example, certain administrations may espouse ideologies or priorities which affect Native interests' pursuit of administrative lobbying. Similarly, future research should explore whether Native lobbying is more successful when targeting particular policy issues versus others. Bureaucratic agencies that address issues more salient to Native interests (e.g., gaming, land use, the environment) may, for instance, be more open to the opinions and expertise of tribal advocates. Finally, tribal coalitions – whether or not they comprise a majority of Native interests – necessarily bring together nations and organizations with different backgrounds, expertise, political connections, and levels of resources. How might these differences affect compromises made in developing advocacy proposals? This question, too, is worthy of future study.

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Appendices

A Tribes in Sample

Alabama-Coushatta Tribe of Texas
Alaska Federation of Natives
Arctic Slope Native Association
Association of Village Council Presidents
Blackfeet Tribe
California Rural Indian Health Board
California Valley Miwok Tribe
Catawba Indian Nation
Cayuga Nation of New York
Cherokee Nation
Cheyenne River Sioux Tribe
Cheyenne-Arapaho Tribes
Coeur d'Alene Tribe
Cook Inlet Tribal Council
Copper River Native Association
Cowlitz Indian Tribe
Delaware Tribe of Indians
Duckwater Shoshone Tribe
Eastern Pequot Tribal Nation
Eastern Shoshone Tribe
Habematolel Pomo of Upper Lake
Hopi Tribe
Hualapai Tribe
Institute of American Indian Arts
Ione Band of Miwok Indians
Juaneno Band of Mission Indians
Karuk Tribe Housing Authority
Kickapoo Traditional Tribe of Texas
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
Minnesota Chippewa Tribe
Narragansett Indian Tribe

National American Indian Housing Council
National Congress of American Indians
National Tribal Environmental Council
Navajo Nation Council
Pueblo de Cochiti
Pueblo of Santa Clara
Pyramid Lake Paiute Tribe
Samish Indian Nation
Seneca Nation of Indians
The National Association of Tribal Historic Preservation Officers
Virginia Indian Tribal Alliance for Life
Yocha Dehe Wintun Nation

B Federal Agencies in Data

Agency	Frequency	Percent
Administration for Children and Families	6	2.33
Bureau of Indian Affairs	39	15.18
Bureau of Labor Management	4	1.56
Bureau of Ocean Energy Management	1	0.39
Centers for Disease Control and Prevention	1	0.39
Centers for Medicare and Medicaid Services	29	11.28
Department of Commerce	1	0.39
Department of the Interior	7	2.72
Department of Justice	2	0.78
Department of State	6	2.33
Department of Transportation	1	0.39
Department of Education	21	8.17
Environmental Protection Agency	29	11.28
General Services Administration	1	0.39
Food and Drug Administration	8	3.11
Federal Emergency Management Agency	3	1.17
Federal Highway Administration	3	1.17
Food and Nutrition Service	6	2.33
United States Forest Service	2	0.78
Federal Transit Administration	3	1.17
Fish and Wildlife Service	20	7.78
Department of Health and Human Services	13	5.06
Department of Housing and Urban Development	4	1.56
Internal Revenue Service	13	5.06
Minerals Management Service	3	1.17
National Oceanic and Atmospheric Administration	6	2.33
National Park Service	3	1.17
Nuclear Regulatory Commission	6	2.33
Office of the Comptroller of the Currency	4	1.56
Office of Federal Procurement Policy	2	0.78
Office of Justice Programs	3	1.17
Office of Management and Budget	1	0.39
Research and Innovative Technology Administration	2	0.78
Rural Utilities Service	1	0.39
Small Business Administration	1	0.39
Department of the Treasury	2	0.78
Total	257	100%

C 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 body of the paper, between a public comment submitted by the California Rural Indian Health Board and a final rule promulgated by the Centers for Medicare and Medicaid Services.

Public Comment from California Rural Indian Health Board:

```
implement suggest list above recommend follow edit propos  
regulations american indian/alaska nativ exceptions follow exclud  
income (i) distribut alaska nativ corpor settlement trusts (ii)  
distribut incom deriv
```

Final Rule by Centers for Medicare and Medicaid Services:

```
american indian/alaska nativ exceptions follow exclud income (i)  
distribut alaska nativ corpor settlement trusts (ii) distribut ani  
properti held trust subject feder restrictions locat within recent  
boundari prior feder reservation
```

D Extended Summary Statistics, Key Variables

Table 5: Summary Statistics, Key Variables (Original Form)

Variable	Mean	Min.	Max.	Std. Dev.	Obs.
Lobbying Influence	45.24	0	564	75.67	133
Financial Capacity	318,694	0	19,000,000	1,444,418	257
Proposed Rule Saliency	35,721	1	1,348,451	171,545	257
Comment Length	2033	25	41,140	3,782	257

E Model 1 - Regression Table

Table 6: Lobbying Influence & Coalition Diversity

<i>DV: Lobbying Influence</i>	
Coalition	1.219** (0.299)
Coalition size	-0.024 (0.022)
Financial capacity	-0.042 (0.032)
Policy salience	-0.121 (0.073)
Policy complexity	0.222* (0.127)
Proposed rule-comment similarity	0.012** (0.004)
Comment length	0.054 (0.147)
Intercept	2.107* (1.078)
N	133
R ²	0.334

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

F Model 2 - Regression Table

Table 7: Lobbying Influence & Coalition Diversity

<i>DV: Lobbying Influence</i>	
Native-dominant coalition	0.861** (0.355)
Coalition size	-0.001 (0.026)
Financial capacity	-0.044 (0.032)
Policy salience	-0.125* (0.074)
Policy complexity	0.202* (0.114)
Proposed rule-comment similarity	0.012** (0.004)
Comment length	0.047 (0.144)
Intercept	2.239** (1.069)
N	133
R ²	0.318

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

G Model 3 - Regression Table

Table 8: Lobbying Influence & Coalition Diversity

<i>DV: Lobbying Influence</i>	
Percent Native	0.743** (0.262)
Coalition size	0.002 (0.022)
Financial capacity	-0.042 (0.033)
Policy salience	-0.132* (0.076)
Policy complexity	0.201* (0.115)
Proposed rule-comment similarity	0.012** (0.004)
Comment length	0.063 (0.154)
Intercept	2.155** (1.115)
N	133
R ²	0.314

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