

# Regulatory Lobbying and the Revolving Door\*

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## Abstract

The American lobbying landscape has increasingly shifted focus to the federal bureaucracy. However, we know little about the conditions that moderate interest group influence in this setting. We argue that interest groups that retain former government employees as lobbyists—and thereby enjoy insider knowledge and connections—experience exceptional lobbying success. We test this claim using original data on a set of nationally active interest groups’ efforts to influence agency rulemaking over a seventeen-year period, joint with publicly available data on registered lobbyists. We find no evidence of a connection between lobbying influence and the revolving door; rather, we find evidence to suggest that revolving door lobbyists may facilitate advantages in pre-proposal rulemaking. We conclude that the disparate advantages of revolving door lobbying may be the exception rather than the rule and may be limited to policymaking stages that place a premium on personal connections—such as agenda-building.

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In late June 2021, the Federal Energy Regulatory Commission (FERC) – an independent agency of the American federal bureaucracy – issued a report announcing its creation of a new office: the Office of Public Participation (OPP). OPP champions a simple mission: to increase public participation in the agency’s policymaking by offering in-house assistance to organizations representing “new and broader constituencies than those that have traditionally participated at FERC (The Regulatory Review 2021).” FERC’s report acknowledged the presence of fundamental imbalances across advocates seeking to participate in administrative policymaking, a process often dominated by those “in the know” – like private stakeholders and industry associations with insider connections (Carpenter et al. 2023; Nelson and Yackee 2012) – along with the “steep learning curve” of effective public participation in agency rulemaking.<sup>1</sup>

OPP was established, in part, to address these imbalances by directly helping smaller interest groups – especially those representing communities disproportionately burdened by energy infrastructure – *learn* how to effectively lobby administrative agencies. The office plans to pilot programs offering technical tools, resources, and trainings to organizations with constituencies that may be impacted by their policy decisions, so that they may become more equipped to participate in the agency’s policymaking processes. And while the outcomes of this new office and its programs have yet to be seen, FERC’s plans place a spotlight on an under-explored facet of American interest group politics: the value of *insider* expertise in administrative lobbying.

## Introduction

Lobbying is the heart of American politics. Scholars have repeatedly documented the importance of organized interest groups’ contributions to politics and policy – from grassroots mobilization to policy implementation (Baumgartner and Leech

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<sup>1</sup><https://www.ferc.gov/media/ferc-report-office-public-participation>

1998). While a great deal of this scholarship has focused on the conditions under which these advocates build movements, fund campaigns, and contribute to electoral and party politics, a growing body of research has sought to explore interest groups' direct influence over policy outcomes, particularly in the administrative setting (Dwidar 2022a; Carpenter et al. 2023; Haeder and Yackee 2015; Kerwin et al. 2011; McKay and Yackee 2007; West 2004; Yackee 2006, 2012). This research has demonstrated powerful effects; organized interest groups often participate in formal policymaking processes. Policymakers – legislators and bureaucrats alike – rely heavily on these groups to determine public and private preferences regarding issue agendas, evaluate possible consequences of policy decisions, identify and respond to errors in policy design, and oversee street-level policy implementation (Baumgartner and Leech 1998; Baumgartner et al. 2009a). These advocates' efforts have been found to effectively set political agendas and dictate policy outcomes across levels and branches of government.

We argue that interest group influence is heavily moderated by an aspect of lobbying implicated by our opening anecdote and yet to be explored by existing scholarship: the *revolving door*. Lobbying is a costly and competitive enterprise; its participants are highly strategic (McCrain 2018; LaPira and Thomas 2014, 2017). A wealth of research has speculated about the possibility of a relationship between the revolving door and lobbying outcomes – and has expressed concern for the erosion of public trust and democratic legitimacy if special access and influence *is* most often enjoyed by advocates with insider connections (Ban et al. 2019; LaPira and Thomas 2017; Liu 2020; Milbrath 1963; Zeigler and Baer 1969; Berry 1977; Schlozman and Tierney 1986; Heinz et al. 1993). We build upon this scholarship by contending that the technical nature of regulatory advocacy poses a high barrier to influence and that groups that retain former government officials as lobbyists – and thereby enjoy the very insider knowledge and connections that FERC's OPP seeks to provide –

experience exceptional lobbying success.<sup>2</sup>

We test this claim using an original dataset and measurement approach relying on modern text analysis tools. Specifically, we introduce new data documenting all notice-and-comment lobbying efforts by a nationally representative sample of interest groups over a seventeen-year period (2000-2016), joint with publicly available data on registered lobbyists. Moreover, because interest groups often advocate through public comments by suggesting regulatory language for inclusion in final agency rules and agency officials often seek and lift these suggestions, verbatim (see Golden 1998, Haeder and Yackee 2015, Potter 2019, and West 2004, among others), we measure groups’ “lobbying influence” by using plagiarism detection software to capture the degree to which each public comment’s text overlaps with that of its corresponding final agency rule. Ultimately, we find no evidence of a connection between the revolving door and lobbying outcomes. Moreover, we find no evidence to suggest that the employment of revolvers with greater expertise and seniority, prior work experience in the federal bureaucracy, and prior employment in the very agencies targeted by their groups’ advocacy, relates to lobbying outcomes.

Instead, we find that the employment of revolving door lobbyists may offer unique advantages in an earlier stage of the regulatory process: pre-proposal rulemaking. Our analyses demonstrate that while interest groups that employ revolving door lobbyists do not experience exceptional lobbying success, they are *significantly quicker to advocate* than their counterparts employing conventional lobbyists. Existing research suggests that agencies often invite key groups and stakeholders to participate in conversations surrounding regulatory proposals prior to the issuance of a proposed rule; the purpose of these conversations is to guide agencies as they develop draft rules – and scholars have found evidence of substantial organizational influence in this

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<sup>2</sup>It is important to note that the literature on the revolving door lobbying raises two individual-level mechanisms of influence: (1) a personal connection to former employers and insider political and (2) process expertise. Due to our empirical focus on organizations, rather than individuals, we do distinguish among them in this work.

stage (see Yackee 2012; Potter 2019; West 2004). Together with our findings, this context may suggest that revolvers' connections offer them access that allows them to shape regulatory proposals prior to the publication of a proposed rule, thereby negating the need for substantial influence through public comment. Thus, we conclude that the disparate advantages of revolving door lobbying may be the exception rather than the rule, and may be limited to policymaking stages that place a premium on personal connections, such as agenda-building. This conclusion advances scholarly understandings of the role of organizational participants in federal rulemaking, with wide-ranging implications for representation and democratic legitimacy in the American administrative state.

## Theoretical Foundations and Argument

Under what conditions do organized interest groups bear influence over public policy? This question has long plagued scholars of collective action and lobbying. Over the last several decades, researchers have considered the effect of myriad activities and patterns in the American lobbying landscape, including informational advantages, the bias of business, and the strategy of selecting tactics and targets (Baumgartner and Leech 1998; Baumgartner et al. 2009a). However, this work remains limited; existing scholarship has yet to account for the unique implications of *insider expertise* in a consequential but under-studied setting: administrative policymaking – the setting in which the bulk of policy decision-making and lobbying activity occurs (Warren 2018; Yackee 2012).

### Interest Groups and the Bureaucracy

Over the course of the last several decades, the role of organized interest groups in the American policy process has grown substantially (Baumgartner et al. 2009a;

Baumgartner and Leech 1998; Baumgartner and Jones 1993; Schlozman et al. 2012, 2014). Across venues and issues, policymakers have come to rely heavily on the contributions of advocacy organizations to evaluate public needs, offer policy solutions, conduct oversight, and even craft provisions of the law (Carpenter 2002; Haeder and Yackee 2015; West 2004). This relationship is no coincidence; as the federal government experienced its “great broadening” in the mid- to late-twentieth century – a substantial expansion in the scope of government into many new policy areas – the interest group population increased exponentially as a direct response to policymakers’ growing needs (Jones et al. 2019; Hojnacki 1997, 1998). Meanwhile, as the major political parties polarized and analytic capacity in Congress atrophied in the late twentieth century, conditions of gridlock have decreased the level of substantive, detailed lawmaking by the legislative branch (Jones et al. 2019; Lewallen 2020). The vast majority of modern policymaking has thus steadily fallen to agents of the federal bureaucracy working to implement provisions of the law. In fact, to date, over *90 percent* of U.S. law is of agency, rather than legislative, origin (Warren 2018).

This disposition of lawmaking authority has compounded the growing power of American interest groups. Interest groups have long maintained close relationships with federal agencies and their operatives (McKay and Yackee 2007; Yackee and Yackee 2006; Yackee 2012). They contribute to bureaucratic policymaking in myriad ways – helping bureaucrats to determine public and stakeholder responses to policy decisions (Hrebendar 1997), raise awareness of policy issues facing agencies (Hrebendar 1997; Rourke 1984), secure budgets (Berry 1989), resist political control (Carpenter 2002), and craft policy language (Haeder and Yackee 2015). And while historically, scholars have focused on the role of interest groups as partners with Congress in guiding the bureaucracy (by “policing” agencies and sounding “fire alarms” in response to problematic actions – see McCubbins and Schwartz 1984, McCubbins et al. 1987 and 1989, and Epstein and O’Halloran 1996 and 1999), a wealth of research has

demonstrated evidence of a direct relationship between groups and federal agencies (see Dwidar 2022a, Cropper 1992, Golden 1998, McKay and Yackee 2007, Nelson and Yackee 2012, and Yackee 2012).

This relationship, scholars argue, is largely sustained by bureaucrats' formal and informal incentives; by law, all federal agencies are required to solicit and review public responses to their policy proposals and federal courts have historically encouraged agencies to be more responsive to groups and citizens who contribute to this process (McGarity 1992, 1997; Rabin 1986; Shapiro 1988). The ongoing threat of judicial review, in particular, is a powerful motivator for agencies to engage in good faith with public participants in their policymaking (Chubb 1983; West 1984). Moreover, agency bureaucrats have strong motivations to pursue the best implementation protocols for the provisions of the law they have been tasked with regulating (Golden 1998; Kerwin 2003; Kerwin et al. 2011); qualitative research describes these policymakers as highly professionalized, driven to produce well-rounded and well-researched policy, and incentivized to avoid public scandal and critique by political principals (Potter 2019; Kerwin et al. 2011; West 2004). Thus, to ensure reasoned and rigorous policy decisions, agency bureaucrats often rely on the perspectives of outside groups participating in the regulatory process.

Consequently, a growing body of research has sought to explore the efficacy of various lobbying conditions and tactics in the administrative setting. Nixon et al. (2002), for instance, report that private and professional interest groups do not dominate influence in notice-and-comment rulemaking – though more recent work has found evidence of substantial wealth-based inequalities among influential commenters (Carpenter et al. 2023). Several other works point to the importance of collaboration in regulatory lobbying; Dwidar (2022a), for instance, demonstrates that federal agencies favor policy recommendations from interest groups advocating in coalitions with organizationally diverse memberships, rather than coalitions that are dominated by

business interests. McKay and Yackee (2007) and Nelson and Yackee (2012) relatedly observe that coalition size and consensus across lobbying groups moderate regulatory influence.

## The Revolving Door

The revolving door – the phenomenon of former government officials departing their public roles for employment in the private sector – has received growing scholarly and media attention. In a recent [piece](#), *The Washington Post*'s Editorial Board decried, “Gone – long gone – are the days when members of Congress scrupled to become lobbyists upon their departure from office. Now, representatives and senators spin like dervishes through the revolving door.” Researchers have similarly approached the trend of revolving door lobbying with skepticism; scholars have pointed to the damning normative implications of the practice – wherein “revolvers” enjoy privileges that conventional lobbyists, particularly those advocating for the ordinary citizen, can never obtain (LaPira and Thomas 2017).

However, little research explores the prevalence and consequences of revolving door lobbying (LaPira and Thomas 2014). In the mid-twentieth century, a small handful of works attempted to offer estimates of the population of revolving door lobbyists, with mixed findings. Milbrath (1963) estimated that less than half of the lobbyist population entered the profession through the revolving door, while Zeigler and Baer (1969) estimated this number to be far lower – at just over an eighth. Throughout the late-twentieth century, scholars largely approached a consensus: that the number of “revolvers” was approximately half of the lobbyist population (Berry 1977; Schlozman and Tierney 1986; Heinz et al. 1993).

In later years, others sought to assess the impact of the revolving door, albeit in the opposite direction. One of the most prominent such studies evaluated the effects of “revolving” in the reverse, in the case of FCC Commissioners with previous



work experience in the broadcast industry (Gormley 1979). Gormley demonstrated evidence of a positive connection; those Commissioners who had previously worked in industry were more likely to side with the industry position in the regulatory process. Later scholarship extended Gormley’s analysis to other agencies (see Quirk 1981) and evaluated the effect of other individual and institutional conditions, such as Commissioner characteristics, congressional influences, and presidential influences (see Cohen 1986); these works offered further evidence of a connection between agency decisions and the presence of reverse-revolvers.

More recently, scholars have sought to establish a broader understanding of the size, scope, and nature of the population of revolving door lobbyists. These works established a series of key findings. First, revolvers consider their employment history to be critical to their success in subsequent roles – around 70 percent believe that their previous employment in government contributes to their expertise and nearly 90 percent believe that their employment history provides unique insider knowledge of policy processes that enables them to succeed in their subsequent careers (Heinz et al. 1993). Second, these perceptions of value appear grounded in reality – Baumgartner et al.’s (2010) seminal work demonstrates that the employment of a covered official is one of the most consistent indicators of lobbying success (self-reported).<sup>3</sup> Baumgartner et al. (2010) conclude that this finding is evidence of the value of the unique and prized resources that revolvers offer to their organizational employers: connections and information – advantages that often make for more successful lobbying. Finally, interest groups are willing to pay a high premium for these unique resources: Blanes i Vidal et al. (2012) demonstrate that revolving door lobbyists generate higher returns (i.e., higher salaries) for their lobbying work; Ban, Palmer, and Schneer (2019) report that former congressional staffers-turned-lobbyists garner higher revenues during times of policy uncertainty; and Liu (2020) finds that businesses tend to favor

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<sup>3</sup>The term “covered official” was established under the Lobbying Disclosure Act (LDA) of 1995 to refer to lobbyists who have held government positions in the previous 20 years.

revolving door lobbyists over conventional lobbyists in periods of policy uncertainty.

Building upon these foundations, LaPira and Thomas’s (2017) work offered the first systematic, large-scale analysis of the size and scope of the revolving door in American national politics. They contribute a series of critical insights: that the revolving door is “much bigger than the existing lobbying disclosure regime reveals and...significantly distorts the representation of interests before government,” that most revolving door lobbyists come from Congress (both former members and rank-and-file staffers), and that revolvers generally work as contract (rather than in-house) lobbyists – and are often hired to work on issues of appropriations. Since the publication of LaPira and Thomas’s work, scholars have sought to better understand the nature of the revolving door in American lobbying. Maske (2017), for instance, reports that lobbying by former members of Congress increases the likelihood that a piece of legislation will pass and that highly effective members often go on to become highly effective lobbyists, should they choose to enter the revolving door. McCrain (2018) demonstrates that the value provided by a former congressional staffer-turned-lobbyist is often a function of their relationships with former coworkers on Capitol Hill. Similarly, Shepherd and You (2020) find that congressional staffers work to “showcase” their abilities to potential organizational employers *prior* to departing their positions in Congress – by producing more legislative outputs in issues of higher lobbying interests and granting greater member access to lobbying firms.

This burgeoning area of research – particularly in recent years – is evidence of the normative and practical importance of the revolving door lobbyist in American politics. The revolver, as evidenced by the above-mentioned scholarship, is a meaningful subject of analysis with wide-ranging consequences for the substance, strategies, and outcomes of organizational advocacy. However, beyond the research that we have previewed in earlier paragraphs, very little attention has been paid to the policy consequences of the revolving door. In fact, absent the small handful of earlier works (see

Cohen 1986, Gormley 1979, and Quirk 1981), to our knowledge, no existing research has evaluated the policy consequences of this phenomenon in the regulatory setting – arguably the most consequential policymaking venue in modern American politics.

## Regulatory Lobbying and the Revolving Door

Policy advocacy targeting the American federal bureaucracy is unique; more than its counterparts in other political institutions, regulatory lobbying is characterized by the importance of highly quality, evidence-based, policy information. Moreover, qualitative research on this process has described bureaucrats’ unique interests in incorporating information received from outside groups in their decision making through the notice-and-comment process; Dwidar’s 2025 book, for instance, dictates a conversation with an agency official with rulemaking duties in which the official describes, “within [my agency’s] four walls, we can only do so much. Information from [outside groups] is extremely helpful to us...they always have some information that we don’t.” Later, Dwidar describes a conversation in which an agency official highlights the kind of information that is most valuable in their decision-making, “the comments that are most useful to us [have] high expertise...they make detailed arguments with supporting evidence.”

These anecdotes underscore the importance of calculated, well-researched policy advocacy in the regulatory setting. Unlike other policymakers, agency bureaucrats enjoy a great informational advantage. They have high expertise and retain the in-house capacity to extensively research the intricacies and consequences of myriad policy choices. Many of the nation’s foremost policy experts serve as advisers and analysts in federal agencies, further reinforcing their informational edge. However, these actors and agencies are still subject to many of the same limitations prevalent in an organizational setting, such as institutional, procedural, and cognitive constraints.

The federal bureaucracy’s informational advantage is thus heavily supplemented

by the contributions of public participants to their policy process. In recent years, scholars have explored the impact of intra- and extra-organizational factors on the outcomes of regulatory lobbying. These works report that agencies tend to favor policy recommendations coming from well-resourced groups and advocates working in collaboration with others; scholars have theorized that these conditions serve to facilitate the provision of higher quality, well-rounded advocacy content. We contend that interest groups that employ revolving door lobbyists experience greater regulatory lobbying influence (*Hypothesis 1*).

Our logic is simple: as the existing literature has outlined, revolvers have unique and valued expertise and access – ranging from extensive issue-based knowledge to insider connections to a strong understanding of how to most effectively frame, craft, and support proposed policy recommendations. As such, revolving door lobbyists are in high demand; scholars have found them to be a valuable political commodity, generating higher salaries for their lobbying work and greater demand for their employment than conventional lobbyists (Blanes i Vidal et al. 2012; Ban et al. 2019; Liu 2020)(Blanes i Vidal et al. 2010; Ban et al. 2018; Liu 2019). In the regulatory setting, as Dwidar (2022b) suggests, a premium is placed on high-quality information; regulatory policymaking is enormously technical and complex and rulemakers privilege advocacy content with detailed, informed, and well-rounded recommendations. Interest groups should be well-served by retaining lobbyists with a unique capacity to produce this kind of advocacy – i.e., revolvers.

However, some revolvers are surely more effective than others. While the mere experience of working in government should offer a range of unique lobbying assets, due to the highly technical nature of agency rulemaking, the employment of a former agency official should offer additional key advantages. Former agency employees are likely to have a more detailed understanding of the regulatory process – and the various entry points for organizations seeking to influence this process – alongside

more pointed connections and experience-based knowledge regarding how to most effectively develop and communicate policy recommendations. Thus, we contend that interest groups that employ revolving door lobbyists with work experience in the *regulatory setting* – i.e., former agency employees – experience greater regulatory lobbying influence (*Hypothesis 2*).

## Data

We test our claims using original data documenting the regulatory lobbying efforts of a nationally representative sample of interest groups, joint with publicly available data on registered lobbyists. We identified instances of regulatory lobbying by collecting all public comments submitted by our sample of organizations over a seventeen year period (2000-2016). To measure lobbying outcomes, we used modern text analysis tools to capture the degree of influence of each public comment over its corresponding final agency rule.

## Notice-and-Comment Rulemaking

Agency policymaking derives from the lawmaking authority of Congress and the president and is governed by the Administrative Procedure Act (APA, 1946). The APA specifies that upon enactment, new laws must be sent to the appropriate federal agencies for implementation; most commonly, this implementation occurs through the “notice and comment” process.<sup>4</sup> Notice and comment rulemaking involves three steps. First, agencies must draft “proposed rules” describing their preferred imple-

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<sup>4</sup>While a growing proportion of agency rules are finalized outside of the scope of this process, the vast majority of agency policymaking occurs through notice-and-comment rulemaking (approximately 71 percent of all published final rules; see GAO 2012, available [here](#)). Adherence to this process is of paramount importance to federal agencies due to both its legal requirement (as per the APA, with few exceptions, all agencies are required to engage in notice-and-comment rulemaking) *and* for allowance of the degree of public participation historically encouraged by the courts in judicial reviews of agency rules (see Lowande 2018, Potter 2019, Raso 2018, and West 2004).

mentation procedure for the provision of law they have been tasked with. Second, agencies must publicize these draft rules during a specified period; this period is referred to as the “comment period.” During these periods, any entities – including private citizens, elected officials, business corporations, organized interest groups, and more – may submit comments expressing their opinions on the proposed rule.<sup>5</sup> Some comments simply express approval or disapproval; most comments, however, are lengthy and make detailed recommendations for how the agency may improve the drafted regulatory content. These comments – particularly those coming from advocates with expertise in the area of the rule and a connection to the communities that may be impacted by the rule – are a vital source of information for agency officials. Finally, upon the closure of the comment period, agencies are mandated to review and respond to all comments and issue a legally-binding final rule.

Importantly, agencies face no requirement to alter their draft rules to fit with the preferences of commenters. Some scholars have thus argued that few significant changes are made in response to the notice and comment period; Yackee 2020, for instance, demonstrates that policy changes made in response to the notice and comment period are more limited than those that occur in earlier stages of the regulatory process – such as rule development. However, the notice and comment period *still* represents a critical advocacy venue. Due to legal mandates and the ever-present threat of judicial review, agency officials have strong incentives to engage with commenters in good faith (see Rabin 1986, Shapiro 1988, McGarity 1992; 1997). As such, a large body of work has found substantial evidence of comment influence during the notice and comment period (see Haeder and Yackee 2015, McKay and Yackee 2007,

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<sup>5</sup>A wide range of participants contribute to this process. While ordinary citizens *can* offer public comments, most contributions to comment periods come from organized interest groups. Scholars have documented that interest groups submit the vast majority of comments (see Golden 1998, Kerwin 2011, and West 2004) and that industry and business groups do not dominate influence in notice and comment rulemaking (see Nixon 2002). Moreover, social and economic justice organizations – interest groups advocating for socially and economically marginalized communities – contribute frequently to this policy process (see Dwidar 2022b).

Yackee 2006; 2006; 2012).

## Interest Group and Rule Selection

We analyze the comment patterns of a stratified random sample of 50 interest groups active in national politics between the years of 2000 and 2016. Our study evaluates all public comments submitted by these groups throughout our period of study; in total, we consider 1,849 public comments submitted on 1,674 rules proposed by 86 federal agencies. To capture our sample, we relied on data compiled by the [Center for Responsive Politics](#) (CRP). Using the CRP’s data, we defined the population of interest groups groups “active in national politics” as all those that submitted at least one lobbying disclosure report during our period of study. To produce our sample, we then drew a stratified random sample of 50 organizations from this population; the sample was stratified according to organizations’ advocacy foci using the CRP’s *category codes* – classifications of groups’ main policy emphases.<sup>6</sup> Thus, for instance, the proportion of advocates with an advocacy focus on the issue of energy and natural resources in our sample is roughly equivalent to the proportion of such advocates in the broader sampling frame.

This sample is not intended to be equally representative of all types of groups, agencies, and policy areas. Rather, it is intended to be representative of the policy landscape as it pertains to the nationally-active lobbying population. Group types, agencies, and policy domains are present in the data at rates commensurate to the degree to which they are active and present on the national lobbying and policy agendas. Our results should therefore generalize to modern lobbying activity by the national interest group population at large. Additionally, it is important to

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<sup>6</sup>The CRP’s category codes are classifications of organizations’ main policy emphases. These category codes are assigned by the CRP on the basis of information from registrants’ websites, annual reports, and financial filings, alongside news articles discussing their advocacy. In ambiguous cases, coders may turn to registrants’ self-reported general issue area codes and specific lobbying issues, as provided on their LDRs. Regrettably, the CRP’s coding guide is not publicly available; these procedures were confirmed through direct correspondence with their research team.

note that our sample size was chosen strategically, with practical considerations in mind. To generate data for this sample of groups – and corresponding regulatory documents – over 10,000 public comments were read and each observation was hand-coded across twenty attributes (producing approximately 50,000 observations); in key cases, observations were double-coded to bolster data credibility. This process required the employment of twenty-three research assistants over a four-year period. The sample size thus represents a sensible compromise between practical limitations and inferential strength.

Table 1 depicts the interest groups appearing in our sample according to their organizational categories. The majority of organizations in the sample (56 percent) are trade, business, or industry groups, such as the National Newspaper Association, the Banker’s Association for Finance and Trade, and the National Association of Realtors. Citizen groups follow closely, at 24 percent, including advocates such as the Interfaith Alliance and Americans United for the Separation of Church and State. Professional and occupational groups compose approximately 12 percent of the sample. Labor unions, governmental associations, and Native American tribes compose the smallest proportions of the sample, at only 4, 2, and 1 percent, respectively. No think tanks or charitable foundations appear in the sample.

Table 1: Sample by Organizational Category

Group type	Frequency	Percent
Business or industry group	10	20.00
Citizen group	12	24.00
Governmental association	1	2.00
Labor union	2	4.00
Native American tribe	1	2.00
Professional association	6	12.00
Trade association	18	36.00
Total	50	100%

The sample consists of interest groups specializing in a wide range of policy areas.



Table 2 illustrates the primary policy foci of the organizations appearing in our sample. Interest groups specializing in health policy compose the largest proportion of the sample, at 20 percent; this trend is intuitive – it is likely due to the prevalence of healthcare policy reform on the national political agenda during our period of study. Organizations with a focus on manufacturing and distributing (10 percent), insurance, and real estate (8 percent), transportation (8 percent), labor (8 percent), and communications/electronics (6 percent) follow closely. The remainder of the sample is fairly equally dispersed across all other policy foci, ranging from 1 to 4 percent of sample members advocating in the policy areas of agriculture, defense, energy and natural resources, the environment, and Indigenous issues.

Table 2: Sample by Policy Focus

Policy Focus	Frequency	Percent
Agriculture	1	2.00
Business	2	4.00
Communications/electronics	3	6.00
Defense	2	4.00
Education	1	2.00
Energy & natural resources	2	4.00
Environment	2	4.00
Finance, insurance, and real estate	4	8.00
Health	10	20.00
Ideological/single-issue	3	6.00
Labor	4	8.00
Manufacturing & distributing	5	10.00
Native American tribes	1	2.00
Transportation	4	8.00
Other	6	12.00
Total	50	100%

## Collecting and Preprocessing Comments and Rules

To collect all public comments submitted by the interest groups in our sample during our period of study, we relied on *Regulations.gov*'s interactive Application Pro-

gramming Interface (API).<sup>7</sup> Our procedure required four steps: First, we built queries to call all public comments submitted by each group in the sample during our temporal domain. We specified parameters for docket type (rulemaking), received date range (January 1, 2000 to December 31, 2016), and keyword (name of the group). We then read each comment returned by each query and removed false positive results.<sup>8</sup> 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 pre-processed all public comment and regulatory documents. This procedure, in line with standard conventions for text analysis, involved the conversion of all words to their stems<sup>9</sup> and removal of stop words<sup>10</sup>, figures, graphics, appendices, and capitalization (Grimmer and Stewart 2013).

The agencies appearing in the data span a range of sizes and specializations – from agencies such as the U.S. Forest Service to the Drug Enforcement Administration to the Department of Health and Human Services – as well as a mix of independent (75 percent) and executive branch (25 percent) agencies.<sup>11</sup> The proposed rules in the data similarly encompass a range of policy topics; as illustrated in Figure 1, 20 out of the 21 major topics proposed by the Policy Agendas Project’s common policy

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<sup>7</sup>*Regulations.gov* is a website that was launched in January 2003 as part of an e-rulemaking transparency initiative by the Bush Administration. This website provides a repository for all regulatory actions and rulemaking materials — past, present, and future — and serves as a portal for public participation in the notice-and-comment process.

<sup>8</sup>The *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 10,000 comments, of which 1,849 had been submitted by the groups in our sample.

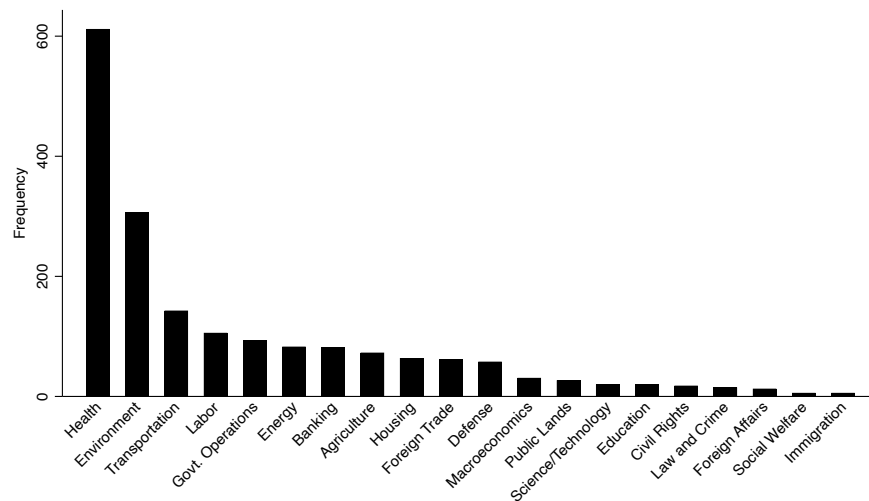
<sup>9</sup>A “stem” is the root of a word remaining after suffixes are removed. For example, the words “traveling”, “traveled”, and “traveler” share the same stem: “travel”. Stemming words in a corpus allows for the grouping of words that share a substantively common meaning, but may differ superficially.

<sup>10</sup>Stop words are words that serve a grammatical purpose and do not otherwise convey meaning. Examples include “a”, “but”, “and”, “how”, “or”, and “what”.

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

coding scheme are present. Many of the proposed rules in the data fall in the areas of health and environmental policy, at approximately 33 and 17 percent of all proposed rules, respectively. This trend reflects the policy context, as these policy subjects were ubiquitous on the national governmental agenda during the period of study. The rules are also characterized by ranges of complexity and salience. They include straightforward, low-salience proposals, such as a proposed rule exempting certain systems of records from provisions of the Privacy Act and more technical and salient efforts, such as proposed rule defining the scope of waters protected under the Clean Water Act.

Figure 1: Proposed Rules by Policy Topic



## Dependent Variable

To operationalize interest groups’ “lobbying influence,” we compared the text of each public comment to its corresponding final agency rule and produced a measure of global textual similarity between the documents. We did so by using a plagiarism detection software called WCopyfind, a tool that compares textual documents and

reports similarities in their words and phrases.<sup>12</sup> WCopyfind allows users to select and edit comparison rules before execution. We adopted the following comparison rules to detect all *perfectly matching* phrases between comment-final rule pairs. These decision rules were informed by existing research that has found them to be reliable for detecting text re-use in policy documents (Clough and Stevenson 2011; Kroeger 2016; Lyon et al. 2001).

- Shortest phrase to match<sup>13</sup>: 6 words
- Most imperfections to allow<sup>14</sup>: 2
- Minimum percent of matching words<sup>15</sup>: 100%
- Skip non-words<sup>16</sup>
- Skip words longer than 20 characters<sup>17</sup>

We then counted all words contained in perfectly matching phrases for each comment-final rule pair; this count represents our final operationalization of groups' lobbying influence. This variable spans a wide range, from 0 to 6,286 (mean = 176; standard deviation = 489).<sup>18</sup>

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<sup>12</sup>The use of plagiarism detection tools to evaluate lobbying influence in the regulatory setting is well-founded. Scholars have reported that interest groups often seek to directly shape the wording of final agency rules through the notice and comment process and regulators often search for and lift commenter language – verbatim – from public comments (see Dwidar 2025; Kroeger 2016; Potter 2019; Yackee 2006 and 2012; West 2004 and 2009; West and Raso 2013, among others). As such, a growing body of scholarship has developed and validated similar text analysis approaches to capturing regulatory lobbying influence (see Bertrand et al. 2020; Carpenter et al. 2020; Carpenter et al. 2023; Haeder and Yackee 2015, among others).

<sup>13</sup>Minimum string length considered to be a match.

<sup>14</sup>Maximum number of non-matches allowed between perfectly matching portions of a phrase.

<sup>15</sup>Minimum percentage of perfect matches that a phrase can contain and be considered a match. Setting this value at 100 percent limits WCopyfind to returning only perfect matches.

<sup>16</sup>Words containing any characters other than letters, except for internal hyphens and apostrophes.

<sup>17</sup>Often non-textual items, including filenames, URLs, or image data.

<sup>18</sup>See Appendix A for an example of a perfectly matching phrase identified using this measurement approach.

## Independent Variables

Our primary independent variable captures the employment of revolving door lobbyists by the groups in our sample. In keeping with prior research, we define a “revolving door lobbyist” as any lobbyist who previously held a position in the federal government (McCrain 2018; LaPira and Thomas 2014, 2017). To construct this variable, we engaged in a manual data collection process. First, for each of the interest groups in our sample, we identified all in-house or contract lobbyists active during the years under study, using data from lobbying disclosures provided by the CRP ( $N = 749$ ). Second, to identify lobbyists with prior federal government employment, we replicated a search protocol introduced by LaPira and Thomas (2017). In line with LaPira and Thomas’s (2017) procedure, for each lobbyist, we used the CRP’s Revolving Door Database to search for employment history information.<sup>19</sup> We supplemented these data with searches of LinkedIn, lobbying firm or organizational websites (e.g. lobbyist profiles espousing former government work experience), and other available online sources.<sup>20</sup> In doing so, we catalogued each lobbyist’s government work history (including start and end years). For each position held, we assigned a category code corresponding to the *type* of government role; the corresponding coding scheme is available in Table 3.<sup>21</sup> The *revolving door* variable is ultimately operationalized at the group-year level through the proportion of the number of lobbyists with previous

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<sup>19</sup>The CRP classifies revolvers as those with previous federal government employment or appointment on a “non-compensated federal government advisory board, independent commission, or congressional-, presidential, or Cabinet-member-appointed entity.” See <https://www.opensecrets.org/revolving-door/methodology>; this database is based on a combination of Columbia Books’ Washington Representatives/Lobbyists.info data source (circa 2006), alongside regular updates by CRP staff from “internal resources and publicly available sources.”

<sup>20</sup>These supplemental searches were conducted in 2023.

<sup>21</sup>This coding process involved a double coding protocol (Cohen’s Kappa = 0.92) in which all observations with coder disagreement were manually reconciled.

work experience in the federal government.<sup>22</sup>

Beyond this key measure, we also collected a series of secondary independent and control variables. First, we collected data on the *financial capacity* of each group in the sample. As we describe earlier, lobbying is often more effective when interest groups have greater financial resources. Thus, to account for this dynamic in our analyses, we recorded each group’s total revenue (dollar amount) in the year of comment submission. We collected these data from information made available by Propublica’s Nonprofit Explorer. This variable ranges widely – from \$7,778 to \$284,000,000 (mean = \$89,600,000; standard deviation = \$90,700,000). Additionally, as a consideration for the exceptional reputation of businesses and their representatives in Washington (see Hojnacki et al. 2015), we accounted for whether or not each organization in our sample represented a *business interest*; this variable is binary and was coded according to the organizational type coding scheme available in Table 4.<sup>23</sup>

Next, we compiled information on the characteristics 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, groups face greater barriers to lobbying influence (Baumgartner et al. 2009a). 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 4,343,039 (mean = 61,075; standard deviation = 374,332). Similarly, we collected information on the *complexity*

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<sup>22</sup>The unit of analysis is group-year; thus, this variable captures the volume of revolvers employed by a given group, in a given year, who previously held any federal government position. Additionally, as a test of robustness, we additionally computed a category-specific iteration of this variable that differentiates prior work experience in the federal bureaucracy from experience in Congress or the White House.

<sup>23</sup>This coding scheme was informed by the work of Baumgartner et al. 2010 and Hojnacki et al. 2015.

*of each proposed rule.* More complex public policies often span multiple constituencies and policy topics. As executive branch officials navigate complex policy design, they often turn to external actors to fill informational gaps (West 2004). 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.<sup>24</sup>

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 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 also spans a wide range, from 41 to 249,742 (mean = 3,681; standard deviation = 13,165).

## Summary Statistics and Empirical Strategy

In total, the interest groups in our sample employed or contracted 749 lobbyists during our period of study (2000-2016). Of these lobbyists, 354 (47 percent) were classified as “revolvers” – i.e., lobbyists with previous work experience in the federal

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<sup>24</sup>We executed this coding procedure using the [Policy Agendas Project](#)’s common policy coding scheme and coding guidelines.

government. This statistic closely approximates that of LaPira and Thomas’s 2017 work, which reports a 52 percent rate of revolver status.<sup>25</sup> Additionally, lobbyists with revolving door experience in our data held 700 unique positions in the federal government. On average, our sample of lobbyists held 1.98 federal government positions (standard deviation = 1.2); this similarly aligns with LaPira and Thomas’s (2017) corresponding finding (1.8 positions). These trends in our data – and their similarities to those reported in prevailing scholarship – lend confidence to the representative nature of our data and generalizability of our findings.

Table 3 depicts the revolving door lobbyists in our data according to their former government employment.<sup>26</sup> Consistent with existing research on the revolving door experience of the lobbying population, congressional staff are the most common category of revolvers, at 35 percent of all lobbyists in our sample. Former positions in the federal bureaucracy compose the second-most common category, at 16 percent. In contrast, lobbyists revolving from the White House are substantially less common, at 4 percent. Lastly, former Members of Congress compose the smallest category of revolvers, at less than 1 percent. These statistics, too, align closely with those reported in LaPira and Thomas’s 2017 work.

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<sup>25</sup>As a point of comparison, we contrasted the lobbyists in our data to those listed in the “covered official” data reported by all registered lobbyists on quarterly LD-2 forms during our period of study; we found that in these publicly available records, only 24 percent of lobbyists in our sample would be classified as revolvers. This comparison – alongside the proportion of revolvers in our data captured using our hand-coded approach – aligns closely with LaPira and Thomas’s 2017 work, which demonstrates that the LDA data significantly under-capture the revolving door relative to a manual search process (at 22 percent in the former and 52 percent in the latter). These trends in our data lend further confidence to the representative nature of our sampling approach.

<sup>26</sup>The coding scheme underlying Table 3 was informed by previous research (see LaPira and Thomas 2017 and McCrain 2018). Also, note that categories of former employment are non-exclusive as lobbyists may have held multiple positions in the federal government.



Table 3: Revolving Door Lobbyists by Former Government Employment

Former Employment	Frequency	Percent
Congressional staffer	266	35.51
Federal agency	123	16.42
Member of Congress	4	0.53
White House	31	4.14
Other federal office	23	3.07

Table 4 illustrates the distribution of revolving door lobbyists in our data according to their interest group employers. The majority of revolvers in our data (53 percent) were employed by trade associations. 25 percent of revolvers were employed by professional associations and 8 percent, by business or industry groups. In total, business, industry, and occupational groups hired over *86 percent* of the revolvers identified in our data. In contrast, citizen groups, labor unions, and governmental associations employed approximately 13, 1, and 0.6 percent of revolving door lobbyists, respectively. These patterns follow theoretical intuition and findings from existing research that demonstrate a strong connection between the representation of moneyed interests and hiring of revolving door lobbyists.

Table 4: Revolving Door Lobbyists by Group Type

Group type	Number of revolvers	Percent revolvers
Business or industry group	27	7.63
Citizen group	47	13.28
Governmental association	2	0.56
Labor union	5	1.41
Native American tribe	2	0.56
Professional association	91	25.71
Trade association	189	53.39
Total*	363	100%

\*Lobbyists in our sample can appear under contracts with multiple organizations, thus,  $N$  exceeds 354.

## Models

To test our hypotheses, we estimated a series of generalized linear regression models with group-clustered standard errors.<sup>27</sup> In all models to come, the dependent variable is a measure of lobbying influence (textual similarity between comment-final rule pairs) and the independent variables are measures of the employment of revolving door lobbyists. The models control for organizational characteristics (financial capacity, business interest), characteristics of the targeted public policy (complexity, salience), and characteristics of the underlying public comment (textual similarity between the public comment and the original proposed rule, public comment length). We additionally account for potential correlations within the data by clustering the standard errors by group. These relationships can be formally expressed by the following equation, where  $Y = \gamma(\mu|\phi)$ :

$$\begin{aligned} \ln(E(Y|X)) = & \beta_0 + \beta_1 \textit{RevolvingDoor} \\ & + \beta_2 \textit{FinancialCapacity} \\ & + \beta_3 \textit{BusinessInterest} \\ & + \beta_4 \textit{PolicySalience} \\ & + \beta_5 \textit{PolicyComplexity} \\ & + \beta_6 \textit{ProposedRuleCommentSimilarity} \\ & + \beta_7 \textit{CommentLength} \end{aligned} \tag{1}$$

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<sup>27</sup>We rely on gamma regression models with log link functions. This modeling choice is appropriate due to the distribution of the dependent variable under study; this variable, textual similarity between comment-final rule pairs, is bound at 0. This condition rules out the use of simpler models – such as ordinary least squares linear regression – which require continuous dependent variables. Other aspects of the models we deploy, including sample size, further validate our modeling choice. For instance, statisticians encourage the use of MLE when the number of observations in the model is greater than 200 and when at least twenty observations per parameter are present (Long 1997).

## Results

Figure 2 visualizes the results of Model 1.<sup>28</sup> This model evaluates whether the employment of revolving door lobbyists relates to interest groups’ regulatory lobbying influence (*Hypothesis 1*). It offers a few key findings: first, the results do *not* reveal a statistically significant effect of revolving door lobbying on interest groups’ advocacy outcomes. In other words, there is no evidence of a connection between the employment of revolving door lobbyists and groups’ lobbying influence.<sup>29,30</sup> This finding lends no support to our hypothesized notion that revolving door lobbyists, generally, yield exceptional policy outcomes for their interest group employers. This observation also runs counter to previously theorized – though untested – assumptions regarding the efficacy of the revolving door.

However, this finding merits careful analysis. More specifically, a comparison of the marginal effects suggests that beyond statistical significance, the employment of revolving door lobbyists has a *very small* substantive effect on the dependent variable: holding all other independent variables at their means, the predicted effect of moving from the mean to the mean plus one standard deviation of the *federal employment* variable under the lower bound of the 95% confidence interval is associated with less than a one-word shift (0.094) in the number of shared words in perfectly matching phrases between comment-final rule document pairs. Similarly, the predicted effect of

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<sup>28</sup>See Appendix B for the corresponding regression table.

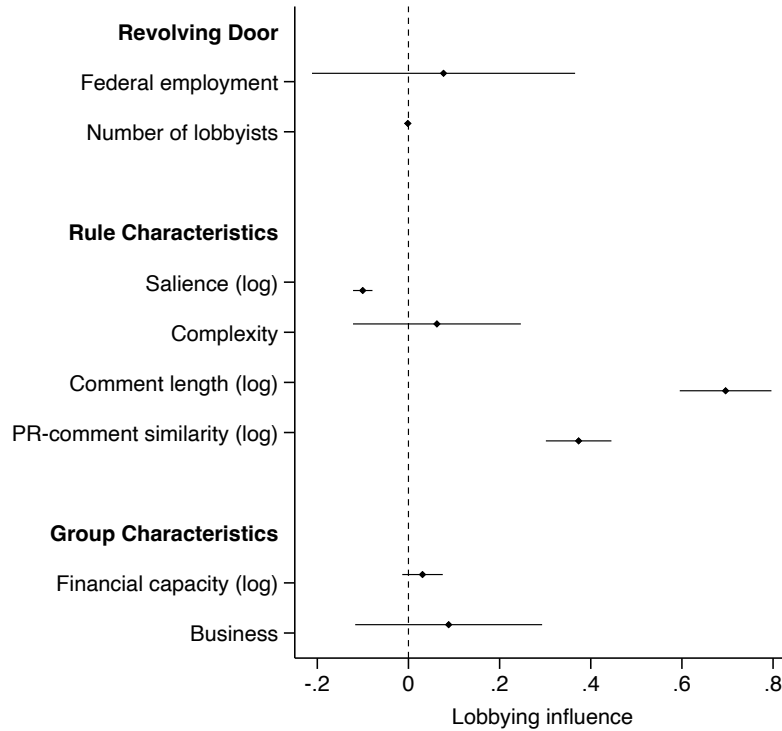
<sup>29</sup>To ensure that this finding is not sensitive to our specific measurement approach, we reestimated Model 1 twice: first, operationalizing the key independent variable as a *count* (the total number of revolving door lobbyists, controlling for the total number of lobbyists employed) – rather than a proportion – and second, operationalizing the key independent variable as a binary variable indicating the mere *presence* of at least one lobbyist with prior federal employment (controlling for the total number of lobbyists employed). In both cases, the model results remain consistent with those presented in the main text.

<sup>30</sup>We conducted a power analysis to determine the minimum sample size needed to detect a meaningful effect. This analysis indicated that we have power to detect an effect size ( $\beta = 0.8$ ) no smaller than  $f^2 = 0.1207$ . This is well below the standard threshold for a medium effect size. Moreover, it is well below our theoretical expectations regarding the minimum effect size for substantive lobbying influence (6 words). As such, this analysis indicates that this model is adequately powered to detect the expected effects.

moving from the mean to the mean plus one standard deviation of this variable under the upper bound of the 95% confidence interval is associated with a -0.179 word shift in the number of shared words in perfectly matching phrases. These findings demonstrate the precision of our null finding – indicated by the narrowness of this range – and demonstrate that the marginal effect on both ends of the confidence interval is extremely small; on both ends, it falls far short of the minimum threshold for substantive policy influence (6 words). Altogether, these findings offer no evidence of a significant relationship between the revolving door and regulatory lobbying influence.

The remaining variables in Model 1 share theoretically intuitive relationships with the dependent variable (e.g., policy salience, comment length, comment-proposed rule similarity); for instance, policy salience shares a negative and statistically insignificant association with the dependent variable, suggesting that regulatory lobbying is more impactful when targeting less salient regulatory proposals. This particular result reiterates a common theme from the existing scholarship: that groups are often more successful when targeting issues with narrower scopes of conflict ([Baumgartner et al. 2009b](#); [Schattschneider 1960](#)). Altogether, these supplemental findings lend confidence to the robustness of this initial model.

Figure 2: Estimation of Lobbying Influence (Model 1)



Generalized linear regression model (Gamma family, log link function) with group-clustered standard errors.  $N = 521$ . Diamonds indicate coefficient values. Lines indicate 95% confidence intervals. Revolving door is measured as the proportion of lobbyists with former work experience in the federal government.

Figure 3 visualizes the results of Model 2.<sup>31</sup> This model evaluates whether the employment of revolvers with work experience in the regulatory setting relates to groups’ lobbying influence (*Hypothesis 2*) – as it may be the case that the specific nature of revolvers’ prior government experience governs the efficacy of their lobbying, particularly in the highly technical and complex context of agency rulemaking. However, the results demonstrate a statistically insignificant relationship between the employment of revolvers with previous work experience in the federal bureaucracy and lobbying influence. In other words, there is no evidence that the hiring of former agency employees as lobbyists shares a connection with interest groups’ regulatory

<sup>31</sup>See Appendix C for the corresponding regression table.

lobbying success.<sup>32,33</sup>

Further, an evaluation of the marginal effects indicates that beyond mere statistical significance, the employment of agency revolvers has a limited substantive effect on the dependent variable: holding all other independent variables at their means, the predicted effect of moving from the mean to the mean plus one standard deviation of the *agency employment* variable under the lower bound of the 95% confidence interval is associated with a shift of less than one word (0.044) in the number of shared words in perfectly matching phrases between comment-final rule document pairs. Similarly, the predicted effect of moving from the mean to the mean plus one standard deviation of this variable under the *upper* bound of the 95% confidence interval is associated with a -0.138 shift in the number of shared words in perfectly matching phrases. Like those of Model 1, these findings reflect the precision of our null finding – indicated by the narrowness of this range – and demonstrate that the marginal effect on both ends of the confidence interval is trivial; on both ends, the effects represent substantively negligible shifts. Once again, this finding runs counter to our hypothesized expectation.

Meanwhile, the remaining relationships in the model continue to share theoretically intuitive findings that are consistent with those of Model 1 and those in the broader literature: there is a negative and statistically significant relationship between policy salience and lobbying outcomes; similarly, there is a statistically insignificant

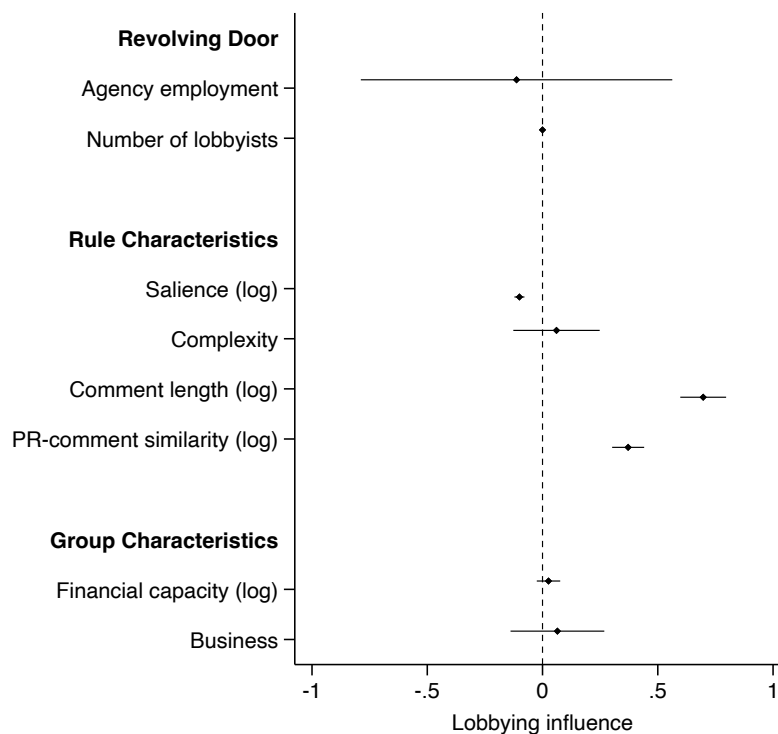
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<sup>32</sup>As with Model 1, to ensure that this finding is not sensitive to our specific measurement approach, we produced two reestimations of Model 2: first, operationalizing the key independent variable as a *count* (the total number of agency revolvers, controlling for the total number of lobbyists employed) – rather than a proportion – and second, operationalizing the key independent variable as a binary variable indicating the mere *presence* of at least one lobbyist with prior agency employment (controlling for the total number of lobbyists employed). In both cases, the model results remain consistent with those presented in the main text.

<sup>33</sup>As with Model 1, we conducted a power analysis to determine the minimum sample size needed to detect a meaningful effect. This analysis indicated that we have power to detect an effect size ( $\beta = 0.8$ ) no smaller than  $f^2 = 0.1207$ . This is well below the standard threshold for a medium effect size. Moreover, it is well below our theoretical expectations regarding the minimum effect size for substantive lobbying influence (6 words). As such, this analysis indicates that this model is adequately powered to detect the expected effects.

relationship between organizations’ financial capacities and influence. These relationships, alongside others in the model (e.g., comment length, comment-proposed rule similarity) are intuitive and consistent with research findings regarding the importance of subsystem attention to lobbying outcomes and the lack of a direct connection between monetary resources and lobbying power (see Baumgartner and Leech 1998 and Baumgartner et al. 2010).

Figure 3: Estimation of Lobbying Influence (Model 2)



Generalized linear regression model (Gamma family, log link function) with group-clustered standard errors.  $N = 521$ . Diamonds indicate coefficient values. Lines indicate 95% confidence intervals. Revolving door is measured as the proportion of lobbyists with former work experience in the federal bureaucracy.

Lastly, to reinforce this analysis, we estimated an additional model iterating upon Model 2. Model 3 evaluates whether the employment of revolving door lobbyists with work experience in the *agency targeted by groups’ advocacy* relates to lobbying influence – for instance, an organization lobbying the Department of State (DOS)

while retaining lobbyists formerly employed by DOS. Figure 3 visualizes the results of this model.<sup>34</sup> The results demonstrate, once again, a statistically insignificant relationship between the employment of revolvers with prior work experience in their “target agency” and lobbying influence. Put differently, there is no evidence that the employment of the most specialized revolving door lobbyists – those formerly employed by the specific agencies targeted by groups’ advocacy – affects regulatory lobbying outcomes.<sup>35,36</sup> As with previous models, an evaluation of the marginal effects further reinforces this finding: the employment of “target agency” revolvers has a substantively inconsequential effect on lobbying influence.

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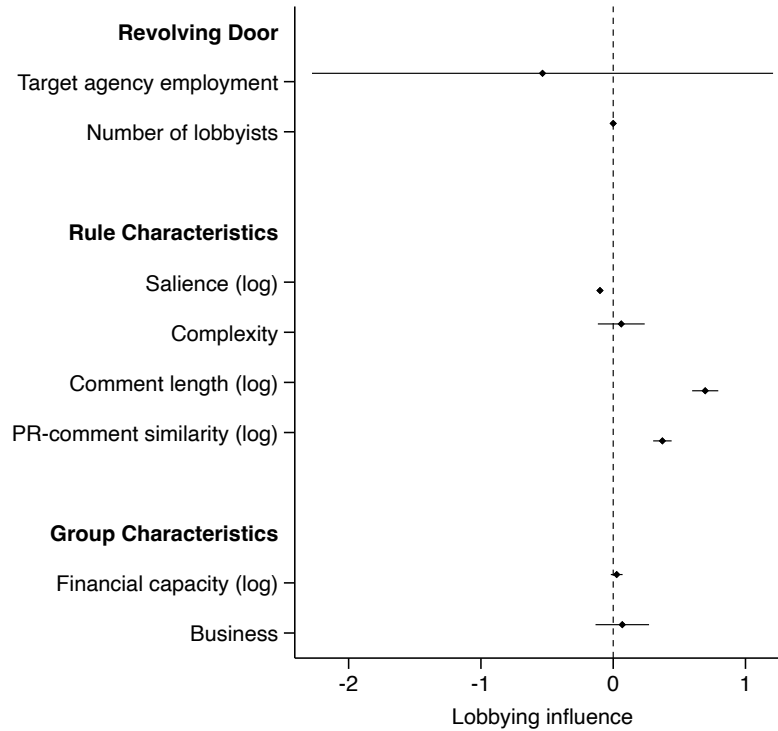
<sup>34</sup>See Appendix D for the corresponding regression table.

<sup>35</sup>As with Models 1 and 2, to ensure that this finding is not sensitive to our specific measurement approach, we produced two reestimations of Model 3: first, operationalizing the key independent variable as a *count* (the total number of target agency revolvers, controlling for the total number of lobbyists employed) – rather than a proportion – and second, operationalizing the key independent variable as a binary variable indicating the mere *presence* of at least one lobbyist with prior target agency employment (controlling for the total number of lobbyists employed). In both cases, the model results remain consistent with those presented in the main text.

<sup>36</sup>As with Models 1 and 2, we conducted a power analysis to determine the minimum sample size needed to detect a meaningful effect. This analysis indicated that we have power to detect an effect size ( $\beta = 0.8$ ) no smaller than  $f^2 = 0.1207$ . This is well below the standard threshold for a medium effect size. Moreover, it is well below our theoretical expectations regarding the minimum effect size for substantive lobbying influence (6 words). As such, this analysis indicates that this model is adequately powered to detect the expected effects.



Figure 4: Estimation of Lobbying Influence (Model 3)



Generalized linear regression model (Gamma family, log link function) with group-clustered standard errors.  $N = 521$ . Diamonds indicate coefficient values. Lines indicate 95% confidence intervals. Revolving door is measured as the proportion of lobbyists with former work experience in the targeted agency.

The findings of Models 1, 2, and 3 suggest a series of important implications. Most prominently, our analysis suggests that scholarly, organizational, and popular perceptions of the unique value of revolving door lobbyists may reflect the exception, rather than the rule. To our knowledge, this work represents the first comprehensive empirical study of the *outcomes* of revolving door lobbying. Thus, while our findings challenge prevailing assumptions, they do not challenge existing research; rather, they advance a burgeoning area of study in an important direction. Without exception, they indicate that the employment of revolving door lobbyists does not relate to greater influence for interest groups seeking to shape agency policymaking through the notice-and-comment process.

Additionally, together with existing scholarship, these findings suggest that the value of revolving door lobbyists in the regulatory process may lie not in their ability to shape policy through public comment – but perhaps in their ability to shape earlier developments in the policy process, such as an agency’s decision to regulate or the drafting a regulatory proposal. In agency policymaking, this “pre-proposal rulemaking” stage is highly shrouded; only select representatives of outside groups are invited to contribute to these *ex parte* (off-the-record) conversations to assist agencies as they develop draft rules (Potter 2019; West 2004; West and Raso 2013; Yackee 2012). Scholars have found evidence of substantial organization influence over regulatory content during this agenda-building stage (see Yackee 2012; Potter 2019; West 2004). This context may suggest that revolvers’ connections offer them access that allows them to shape regulatory proposals prior to the initiation of the notice-and-comment process, thereby negating the need for substantial influence through public comment.<sup>37</sup> This suggestion is further supported by our earlier descriptive findings regarding the employers of revolving door lobbyists and extant literature: our data demonstrate that advocates for business, professional and trade interests employ the vast majority of revolvers (84 percent) – and scholars have reported that these categories of groups are most often invited to contribute to conversations surrounding pre-proposal rulemaking (Golden 1998; Potter 2019; West 2004; Yackee 2012).

A simple inferential analysis offers support for this suggestion: Figure 5 depicts the results of Models 4a, 4b, and 4c – models evaluating the effect of the employment of federal revolvers, agency revolvers, and “target agency” revolvers on the speed with which interest groups respond to the issuance of a Notice of Proposed Rulemaking

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<sup>37</sup>Some readers may question whether interest groups with involvement in pre-proposal rulemaking have limited incentives to issue public comments – as perhaps their influence in an earlier stage of the regulatory process negates the need for comment submission entirely. It is important to note that judicial incentives to establish a written record incentives *all* stakeholders to submit public comments, regardless of insider access/earlier opportunities for influence (Kerwin et al. 2011; Potter 2019; West 2004).

(NPRM).<sup>38</sup> If, as we suggest, the organizational employers of revolving door lobbyists enjoy the opportunity to shape these proposals prior to the opening of the notice-and-comment period, their comments are likely to be submitted with greater speed than their conventional counterparts. Simply put: they should have a “heads up” that other groups do not receive and this advantage should generally moderate the speed with which they advocate. We should expect this relationship to be most pronounced in cases of “target agency” revolvers – who are likely to retain stronger personal connections with agency officials.

The results offer support for this suggestion. While Models 4a and 4b report null relationships between advocacy speed and the employment of federal and agency revolvers, Model 4c demonstrates a negative and statistically significant relationship between the employment of “target agency” revolvers and the speed with which interest groups submit public comments.<sup>39,40</sup> In other words, interest groups that retain revolving door lobbyists previously employed by the very agencies they seek to influence are *significantly quicker* to advocate during the notice-and-comment period than their counterparts employing conventional lobbyists and other types of revolving door lobbyists. More specifically, holding all other independent variables at their means, an increase in the proportion of “target agency” revolvers from the mean value to the mean plus one standard deviation yields a 24-day decrease in the variable *days*

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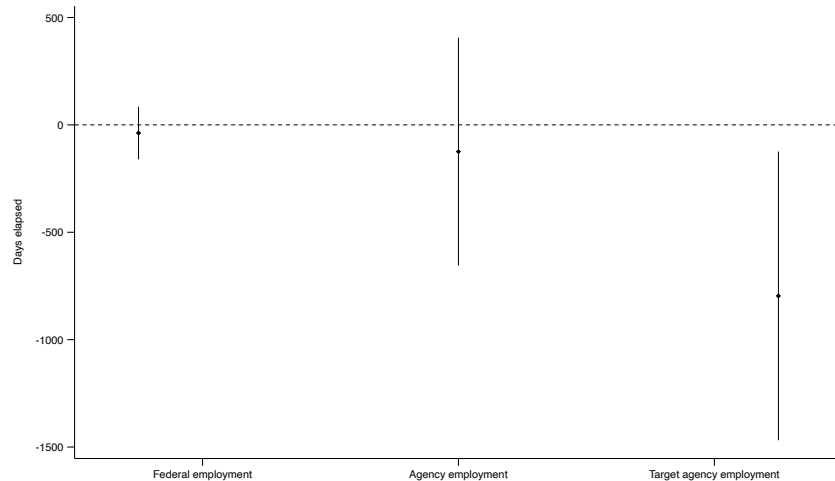
<sup>38</sup>The dependent variable, *days elapsed*, is operationalized through the number of days elapsed between the opening of the comment period (marked by the public release of the NPRM) and the the date of comment submission. See Appendix E for the corresponding regression table.

<sup>39</sup>As with Models 1 through 3, to ensure that this set of findings is not sensitive to our specific measurement approach, we reestimated Models 4a through 4c operationalizing the key independent variable as a *count* (controlling for the total number of lobbyists employed) – rather than a proportion – and, separately, as a binary variable indicating the mere *presence* of at least one lobbyist with prior government, agency, and target agency employment, respectively (controlling for the total number of lobbyists employed). In all three cases, the model results remain consistent with those presented in the main text.

<sup>40</sup>As with Models 1 through 3, we conducted a power analysis to determine the minimum sample size needed to detect a meaningful effect. This analysis indicated that we have power to detect an effect size ( $\beta = 0.8$ ) no smaller than  $f^2 = 0.0286$ . This is well below the standard threshold for a medium effect size. Moreover, it is well below our theoretical expectations regarding the minimum effect size for substantive lobbying influence (6 words). As such, this analysis indicates that this model is adequately powered to detect the expected effects.

*elapsed*. Taken in context – the typical length of a comment period is approximately 60 days – this effect size is both statistically and substantively meaningful.<sup>41</sup>

Figure 5: Estimation of Advocacy Speed (Model 4)



Model 4a (left;  $N = 454$ .); Model 4b (middle;  $N = 454$ .); Model 4c (right;  $N = 454$ .). Generalized linear regression models (Gamma family, log link function) with group-clustered standard errors. Diamonds indicate coefficient values. Lines indicate 95% confidence intervals. *Days elapsed* is measured as the total number of days elapsed between the opening of the comment period and the date of comment submission.

## Robustness Checks and Alternative Explanations

As the reader may now be thinking, several possibilities remain. For instance, does the overall career expertise of revolvers – rather than their mere government employment – relate to lobbying outcomes? What about the possibility of “fading connections,” wherein revolvers’ effectiveness may decline as the years since their time in government pass? Does the agency response to comments — which is typically embedded in the text of final agency rules – contribute to an over-estimation of the observed effect? In this section, we evaluate these, along with other, alternative explanations.

<sup>41</sup> *Source:* The Office of the Federal Register, “[A Guide to the Rulemaking Process.](#)”

First, following LaPira and Thomas (2017), we generated an additional measure of revolving door lobbying accounting for the *expertise and seniority* of revolving door lobbyists. This measure is designed to account for revolvers’ degree of status and seniority in government and is operationalized through the proportion of the number of prior government positions held by each revolver. We then reestimated Models 1, 2, and 3 accounting for this measure (see Models 5a, 5b, and 5c in Appendix F).<sup>42</sup> In all three cases, the model results remain unchanged in significance and direction from those in previous sections; additionally, they indicate no evidence of a relationship between greater professional status and expertise among revolvers, agency revolvers, and “target agency” revolvers and regulatory lobbying influence.

Second, as scholars have suggested, the dynamic of “fading connections” may moderate the influence of revolving door lobbyists. Blanes i Vidal et al., for instance, report that former congressional staffers experience a drop in revenue upon the departure of their former employer from office. A similar pattern is likely to be true the context of our study – as time passes, revolvers’ contacts may depart from their agency roles and their institutional knowledge may become “out of date.” To account for this possibility, we produced a variable at the group-year level indicating the proportion of revolvers that represented a *recent departure from government* – specifically, whether they departed public service in the five years prior to the year of comment submission. We then reestimated Models 1, 2, and 3 accounting for this measure (see Models 6a, 6b, and 6c in Appendix G).<sup>43</sup> Once again, in all three cases, we find no evidence of a statistically significant relationship between the revolving door and lobbying influence.

Third, the nature of our sampling procedure – which selected on interest groups, rather than agency rules, may pose a potential concern. There may be systematic differences between the types of rulemakings that groups with and without revolving

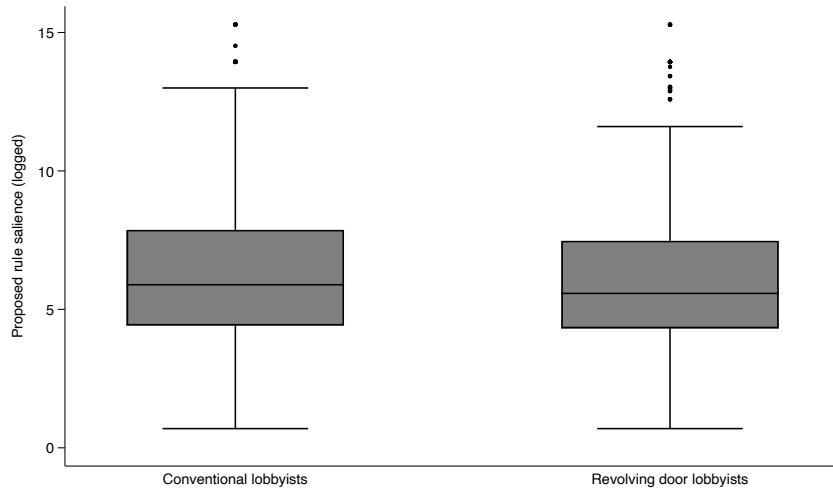
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<sup>42</sup>See Appendix F for the corresponding regression table.

<sup>43</sup>See Appendix G for the corresponding regression table.

door lobbyists advocate upon, and these differences may have consequences for our findings. For instance, organizations that employ revolving door lobbyists may be more equipped to address more complex or salient policy proposals – such as those that span a wide range of policy areas and garner a greater deal of organizational and stakeholder attention – than less visible and more straightforward implementations, and these particular policies may be harder to bear influence over due to their nature. If this is the case, the data should reflect these patterns – but they do not. 60 percent of advocacy efforts by groups employing revolvers occur in response to policies with the *lowest possible* level of complexity; 26 percent occur in response to policies with the second-lowest level. In other words, the organizational employers of revolving door lobbyists are not predominantly advocating on highly complex issues – and these advocacy patterns are similar to those of their conventional counterparts (75 percent of advocacy efforts by groups employing conventional lobbyists targeted policies with the lowest possible level of complexity and 24 percent, the second-lowest level). Figure 6, moreover, depicts a summary distribution of policy salience (logged) over the occurrence of advocacy by interest groups employing revolving door lobbyists. It demonstrates that there is no difference between the levels of salience of proposed rules targeted by organizations that do and do not employ revolvers. These statistics should ameliorate concerns regarding the possibility that the employers of revolving door lobbyists self-select into advocacy on policies with distinct characteristics from their conventional counterparts and that may pose unique challenges to success.

Figure 6: Distribution of Policy Saliency over Revolving Door Employment



Fourth, the reader may be aware that federal agencies are required to publish their responses to “significant” public comments as a part of each final rule (Potter 2019; West 2004). These responses summarize the key points of the comments and describe the agency’s response; in doing so, they often (tersely) articulate whether, and why, they have chosen to adopt or disregard the comment’s recommendations. This communication is vital to the rulemaking process. It reinforces agencies’ mandates to carefully review the public comments that they receive and establishes a written record for purposes of oversight and judicial review. However, the publication of these responses as a part of final agency rules poses a measurement concern for this work: the inclusion of the agency response – which, in some cases, provides a summary of comments’ recommendations – may contribute to an over-estimation of the dependent variable. Thus, to ameliorate this concern, we manually removed the agency response section from most final rules appearing in the data (58 percent) and re-produced a constrained version of the dependent variable. In the remaining 42 percent, the agency response was interwoven within the final regulatory language (distributed across hundreds — and in some cases, thousands — of pages without obvious in-text identifiers), making it impossible to identify and remove each component

of the response by hand or using automated tools.

However, within the corpus of rules from which we were able to manually remove the agency response, the correlation between the original and constrained dependent variable was 0.98, suggesting that the results presented in the previous section are not driven by the inclusion of the text of the agency response. Though it is possible that the group of rules from which we were not able to remove the agency response might differ systematically from the group from which we were able to investigate this possibility directly, we did not detect any such differences. Both sets of rules appear similar in complexity, salience, and length.

Lastly, due to the operationalization of the dependent variable, our findings do not address cases where a final rule was not issued, but where a comment sought to “kill” the rule and thus succeeded in achieving its goal. While it is certainly possible that some comments in the corpus successfully urged regulators to shelve the corresponding proposed rules, the withdrawal of proposed rules is rare, as they are slowly and carefully developed over long periods of time, typically with the consultation of outside groups (Potter 2019). This trend is reflected in the data: less than two percent of proposed rules in the data were formally withdrawn.

Regardless, this phenomenon is a form of *negative* lobbying power — lobbying against a particular policy proposal in its entirety. Since it is not possible to measure textual similarity without a final rule, these cases are excluded from the data and models presented in this paper. This condition represents an important limitation of our work. While a manual reading of the pertinent documents could allow for an analysis of these cases, it is beyond the scope of the data and analysis used in this work, which are concerned with a form of positive lobbying power — lobbying to refine, rather than eliminate, the content of a policy proposal.



## Discussion

As congressional capacity has atrophied, American policymaking authority has steadily shifted to the federal bureaucracy – a branch of government responsible for over 90 percent of US law. Much of this policymaking occurs through notice-and-comment rulemaking – a process dominated by the influence of interest groups (Golden 1998; McKay and Yackee 2007; Yackee 2006). Indeed, scholars have reported that interest groups attend closely to policy implementation by federal agencies and dedicate the majority of their lobbying to shaping regulatory decisions, often through public comment. Policymakers, moreover, place a premium on these contributions and often seek guidance from outside groups during the regulatory process (Golden 1998; Potter 2019; West and Raso 2013). However, while scholars have recently begun to explore the direct connection between lobbying and agency policymaking, this area of study remains limited. The practice of revolving door lobbying is among the most glaring gaps in our knowledge of this connection.

Our work responds to this gap by offering the first systematic empirical analysis of the efficacy of revolving door lobbying in American national and regulatory politics. Overall, we find no evidence of a connection between the revolving door and lobbying outcomes. Moreover, we find no evidence to suggest that the employment of revolvers with prior work experience in the federal bureaucracy, prior employment in the very agencies targeted by their groups’ advocacy, or greater expertise and seniority relates to lobbying outcomes. Instead, we find that the employment of revolving door lobbyists may offer unique advantages in an earlier stage of the regulatory process: pre-proposal rulemaking.

Our analyses demonstrate that while interest groups that employ revolving door lobbyists do not experience exceptional lobbying success, those that employ “target agency” revolvers are significantly quicker to advocate than their counterparts employing conventional lobbyists and other revolving door lobbyists. Together with

our main findings, this context suggests that revolvers with personal connections in the political institutions of interest to their organizational employers may facilitate advance policy access that allows groups to shape regulatory proposals prior to the publication of a proposed rule. Thus, we conclude that the disparate advantages of revolving door lobbying may be the exception rather than the rule, and may be limited to policymaking stages that place a premium on personal connections, such as agenda-building. This conclusion advances scholarly understandings of the role of organizational participants in agency policymaking, with wide-ranging implications for representation and democratic legitimacy in the American administrative state.

There remains a great deal of room for future research. Most prominently, our findings raise important questions regarding representation and bias in regulatory lobbying. Future scholarship should interrogate the presence of disparities among groups that do – and do not – consistently employ revolving door lobbyists, as well as the downstream consequences of these disparities. For instance, if most revolvers are employed by interest groups representing wealthy, elite interests – and these groups are most likely to attend invite-only conversations surrounding pre-proposal rulemaking – whose voices do not get a seat at the table, and with what consequence? Additionally, our findings raise important questions regarding the normative and practical consequence of government interventions to facilitate greater public participation in rulemaking. As our opening anecdote suggested, agencies *can* put in the work to ensure that “insider information” is available not only to well-connected groups, but to organizations that serve the most vulnerable, disproportionately impacted, communities. The Federal Energy Regulatory Commission (FERC), for instance, is actively piloting outreach and training programs to mediate disparities among rulemaking participants. Can these interventions successfully promote greater informational access among public participants in agency rulemaking?

Further, as our findings make clear, revolving door lobbyists are not a monolith;

variations in the types of government experience held by revolvers have clear consequences for their work in the lobbying sector. Future research should thus further explore these differences, particularly as they pertain to interest groups' strategic decision-making. Finally, our conclusions suggest that revolving door lobbyists may enjoy acute advantages in an earlier, hidden phase of the rulemaking process: pre-proposal rulemaking. While a small body of scholarship has explored the possibility of interest group influence in this setting – alongside the importance of this policy-making stage – future research should further interrogate this dynamic.

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# Appendices

## A Perfectly Matching Phrase Example

The text below illustrates an example of a perfectly matching phrase detected using the measurement approach described in the main text. The phrase was captured from a public comment submitted by the Coalition Against Religious Discrimination (CARD) and a final rule promulgated by the Department of Veterans Affairs (VA).

Public Comment from CARD:

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

Final Rule by VA:

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

## B Model 1 Results

Table 5: Model 1 - Effect of Proportion of Lobbyists with Federal Employment on Lobbying Influence

	1
Federal employment	0.0288 (0.06)
Number of lobbyists	0.0009 (0.00)
Policy salience (log)	-0.0211*** (0.00)
Policy complexity	0.0137 (0.03)
Comment length (log)	0.1263*** (0.02)
PR-comment similarity (log)	0.1232*** (0.01)
Financial capacity (log)	0.0007 (0.01)
Business	-0.0004 (0.05)
Constant	0.0052 (0.16)
Obs.	521

\*  $p < 0.05$ , \*\*  $p < 0.01$ , \*\*\*  $p < 0.001$

## C Model 2 Results

Table 6: Model 2 - Effect of Proportion of Lobbyists with Agency Experience on Lobbying Influence

	2
Agency employment	0.0998 (0.10)
Number of lobbyists	0.0007 (0.00)
Policy salience (log)	-0.0209*** (0.00)
Policy complexity	0.0168 (0.03)
Comment length (log)	0.1269*** (0.02)
PR-comment similarity (log)	0.1222*** (0.01)
Financial capacity (log)	0.0010 (0.01)
Business	-0.0018 (0.05)
Constant	-0.0004 (0.20)
Obs.	521

\*  $p < 0.05$ , \*\*  $p < 0.01$ , \*\*\*  $p < 0.001$

## D Model 3 Results

Table 7: Model 3 - Effect of Proportion of Lobbyists with Target Agency Experience on Lobbying Influence

	3
Target agency employment	0.0512 (0.26)
Number of lobbyists	0.0011 (0.00)
Policy salience (log)	-0.0211*** (0.00)
Policy complexity	0.0144 (0.03)
Comment length (log)	0.1270*** (0.02)
PR-comment similarity (log)	0.1222*** (0.01)
Financial capacity (log)	-0.0003 (0.01)
Business	-0.0071 (0.05)
Constant	0.0284 (0.19)
Obs.	521

\*  $p < 0.05$ , \*\*  $p < 0.01$ , \*\*\*  $p < 0.001$

## E Model 4 Results

Table 8: Model 4 - Effect of Proportion of Revolving Door Lobbyists on Days Elapsed

	4a	4b	4c
Federal employment	-37.8798 (59.77)		
Agency employment		-124.5159 (258.52)	
Target agency employment			-796.2461* (327.55)
Number of lobbyists	-0.5518 (2.45)	-0.3507 (3.12)	-0.1151 (2.52)
Policy complexity	88.1555 (46.94)	82.2086 (48.86)	79.5628 (49.69)
Financial capacity (log)	-19.4973 (16.11)	-20.0092 (17.35)	-21.4245 (16.31)
Business	-106.5200 (52.65)	-104.2003* (41.63)	-98.8999* (42.36)
Constant	438.8378 (270.82)	449.3135 (302.24)	469.7186 (275.71)
Obs.	454	454	454

\*  $p < 0.05$ , \*\*  $p < 0.01$ , \*\*\*  $p < 0.001$



## F Robustness Check: Seniority of Revolvers

Table 9: Model 5 - Effect of Proportion of Senior Revolving Door Lobbyists on Lobbying Influence

	5a	5b	5c
Senior federal employment	-0.0575 (0.14)		
Senior agency employment		-0.0426 (0.21)	
Senior target agency employment			0.0193 (0.05)
Number of lobbyists	0.0015 (0.00)	0.0013 (0.00)	0.0010 (0.00)
Policy salience (log)	-0.0210*** (0.00)	-0.0212*** (0.00)	-0.0211*** (0.00)
Policy complexity	0.0127 (0.03)	0.0137 (0.03)	0.0141 (0.03)
Comment length (log)	0.1278*** (0.02)	0.1271*** (0.02)	0.1270*** (0.02)
PR-comment similarity (log)	0.1211*** (0.01)	0.1219*** (0.01)	0.1224*** (0.01)
Financial capacity (log)	-0.0012 (0.01)	-0.0008 (0.01)	-0.0001 (0.01)
Business	-0.0119 (0.04)	-0.0080 (0.05)	-0.0075 (0.05)
Constant	0.0479 (0.20)	0.0396 (0.20)	0.0261 (0.19)
Obs.	521	521	521

\*  $p < 0.05$ , \*\*  $p < 0.01$ , \*\*\*  $p < 0.001$

## G Robustness Check: Fading Connections

Table 10: Model 6 - Effect of Proportion of Recent Revolving Door Lobbyists on Lobbying Influence

	6a	6b	6c
Recent federal employment	-0.0370 (0.08)		
Recent agency employment		-0.3322 (0.30)	
Recent target agency employment			-0.0457 (0.06)
Number of lobbyists	0.0011 (0.00)	0.0011 (0.00)	0.0011 (0.00)
Policy salience (log)	-0.0210*** (0.00)	-0.0212*** (0.00)	-0.0212*** (0.00)
Policy complexity	0.0152 (0.03)	0.0141 (0.03)	0.0141 (0.03)
Comment length (log)	0.1269*** (0.02)	0.1266*** (0.02)	0.1266*** (0.02)
PR-comment similarity (log)	0.1219*** (0.01)	0.1222*** (0.01)	0.1224*** (0.01)
Financial capacity (log)	0.0001 (0.01)	0.0004 (0.01)	-0.0002 (0.01)
Business	-0.0096 (0.05)	-0.0095 (0.05)	-0.0078 (0.05)
Constant	0.0255 (0.19)	0.0242 (0.19)	0.0315 (0.19)
Obs.	521	521	521

\*  $p < 0.05$ , \*\*  $p < 0.01$ , \*\*\*  $p < 0.001$