Representing Women, Responding to Rules: Women's Organizations' Participation in the Rulemaking Process

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Abstract. It is no secret that rising levels of partisan polarization and gridlock have made it increasingly difficult to legislate change, but it may be surprising to learn that in recent years, policymakers and advocates have turned to the relatively unknown rulemaking process to affect policy change instead. Despite the increasing importance of rulemaking as a way to create policy change and the unique strategic opportunities it provides for women's organizations to advocate on behalf of women, we know little about how women are represented in this policymaking venue. Therefore, this paper brings findings from the rulemaking literature together with calls for new studies of women's representation that move beyond the legislative process to examine whether and how American women are represented when women's organizations participate in the rulemaking process. Using automated text analysis, qualitative coding, and a series of count models, it shows that women's organizations frequently do represent women by participating in the rulemaking. However, my findings also indicate that the representation that women's organizations provide during this process is biased because women's organizations most often use the comments they submit to refer to women as a broad-based, deserving group and to downplay the differences between women based on their ages; gender identities; races, ethnicities, and nationalities; sexual orientations; and socioeconomic statuses. Despite this persistent bias towards homogeneity among women, the findings also suggest that coalitions of women's organizations that form during this process have the potential to increase the level of attention paid to differences between women based on their races, ethnicities, nationalities, and socioeconomic statuses.

For much of the past decade, the US government's ability to use the policymaking process to respond to important issues has reached its nadir. Facing some of the least productive and most polarized Congresses in recent history (US Congress 2017; Voteview 2016), 70% of Americans now say that they are only "slightly confident" or "not at all confident" that the US government can address the important issues the country faces today and many even cite the "government" as one of the most important problems facing the country (The Associated Press NORC Center for Public Affairs Research 2017: Gallup 2016). Given these rising frustrations, policymakers and advocacy organizations have increasingly turned to a different policymaking venue – the rulemaking process – to create policies that address pressing social problems. Rulemaking occurs after the legislative process and it gives the unelected officials working in federal departments and agencies considerable authority to shape policies by "filling-in" many of the technical details that are needed for our laws to operate on a daily basis. Because rulemaking is a relatively unknown component of the policymaking process that is conducted by experts who work in the federal bureaucracy, it also has the advantage of being relatively insulated from many of the partisan and electoral considerations that have paralyzed legislative policymaking. Thus, when they were in office, the Obama administration considered three times as many rules as Congress passed laws, and they issued 38.9% more major rules than the George W. Bush administration (US Congress 2017; US Government Accountability Office 2017; US Office of Information and Regulatory Affairs 2017). Though rulemaking has increased in importance and it is now used to address a wide range of issues, we know very little about how women and their advocates participate in this process. How often do they lobby rulemakers? Which women's interests and concerns do they focus on when they participate? Is this process biased in favor of some subgroups of women over others?

To answer these questions and respond to recent calls in the women and politics literature for more studies of how women are represented in policymaking venues other than legislatures (Celis et al. 2014; Escobar-Lemmon and Taylor-Robinson 2014), this paper provides the first examination of whether and how women's organizations represent women when they participate in the rulemaking process by analyzing an original dataset derived from 1,085 comments that women's organizations submitted to federal agencies between 2007 and 2013. It specifically answers three questions about the representation that women's organizations provide during this process. First, it asks whether or not women's organizations use their comments to highlight the ways that proposed rules have a unique impact on women. Second, it considers which women that women's organizations refer to in the comments they submit to rulemakers. Do they portray women as a broad-based homogenous group or do they examine how proposed rules may affect women differently based on their intersecting identities in terms of their ages; gender identities; races, ethnicities, or nationalities; relationships to others; sexual orientations; and/or socioeconomic statuses? Are they more likely to focus on some subgroups of women than others? Third, when are women's organizations the most likely to portray women as a broad-based homogeneous group and when are they more likely to focus on the differences between women?

I answer these questions using a mixed methods approach that combines automated text analyses, qualitative coding, and statistical analyses to determine when and how women's organizations' referred to women and different subgroups of women in the comments they submit to rulemakers. Then, I consider how their references to women change depending on whether or not the rulemaking that they participated in had a moral policy component, received coverage in American newspapers, and/or occurred during the Democratic Obama administration

or the Republican Bush administration. I also examine how women's organizations' references to women shifted depending on whether or not they wrote comments on their own or whether they signed comments with other women's organizations. Altogether, these analyses indicate that women's organizations' participation in rulemaking provides women with an important source of representation during the implementation stages of the policymaking process because women's organizations do use their comments to highlight the unique ways that proposed rules impact women. However, I also find that though rulemaking often presents women's organizations with a unique, under the radar opportunity to address the concerns of some of the most vulnerable and marginalized women, yet they often fail to fully take advantage of that opportunity. Instead, they most often use their comments to refer to women as a broad-based, homogenous, deserving group, downplaying the differences that exist between women. This bias against discussing the diversity of women's experiences is exacerbated when rulemakings receive media attention and contain a moral policy component.

WHY RULEMAKING?

Though rulemaking is a relatively unknown component of the policymaking process, it provides bureaucrats, through consultation with interested citizens and organizations, with a unique opportunity to create meaningful policy change. Rulemaking gives considerable power and policymaking authority to bureaucrats because it allows them to use their policy expertise and the information they have gathered from interested stakeholders to "fill-in" many of the technical and seemingly minor details that are needed for congressionally passed policies and programs to function on a daily basis (Epstein and O'Halloran 1999; Furlong 1998; Huber and Shipan 2002). Because the Administrative Procedures Act of 1946 requires bureaucrats to engage in a "notice and comment" process before rules can go into effect, agencies typically

engage in at least four steps when they write rules. First, they develop their proposed rule and they publish it, and their justifications for it, in the *Federal Register*.[1] Second, they solicit and accept comments from interested members of the public during a set comment period. Third, they review the comments that interested members of the public submitted and consider whether or not to make changes to their proposed rule. Fourth, they publish the final rule, their justifications for it, and information about how they responded to the comments they received in the *Federal Register*.

Though bureaucrats retain considerable discretion to respond to and incorporate public suggestions into their final rules as they see fit (Golden 1998; Kerwin and Furlong 2011; West 2004, 2009), rulemaking still provides women and their advocates with a unique opportunity to influence policy for four reasons. First, the legally required public comment period makes participation in this process open to any woman or women's organization, not just those who have access or close connections to members of Congress (MCs) or other government officials. Second, women are better represented in bureaucratic agencies than they are in the US Congress. For example, as of 2012, when much of this study was conducted, women held 33.4% of high-level bureaucratic positions compared with only 18.5% of the seats in Congress (Center for American Women in Politics 2014; US Office of Personnel and Management 2014). Lobbying the higher numbers of female officials in the bureaucracy is strategically important for women's organizations because it increases the chances that women's concerns will be heard by a set of officials that represents and understands the full range and diversity of women's experiences (Dolan 2000, 2002, 2004; Greene and Selden 2000; Hale and Kelly 1989; Keiser et al. 2002;

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[1] The *Federal Register* is published daily by the Office of the Federal Register at the National Archives and Records Administration. It includes information about a number of federal agency actions, such as their proposed rules, their final rules, changes in rules, guidance about how policies should be implemented, and notices of upcoming meetings or hearings (US Office of the Federal Register 2017).

Krislov 2003 [1974]; Mansbridge 1999; Meier 1975; Riccuci and Meyers 2004; Saltzstein 1979; Selden 1997; Wilkins 2006; Wilkins and Keiser 2006). Therefore, women and their advocates may also be more likely to focus on the ways that policies impact women differently based on their intersecting identities in addition to highlighting the ways that policies impact women as a broader group when they lobby bureaucrats rather than MCs. Third, because participation in rulemaking frequently requires policy-related technical expertise, it typically receives lower levels of public attention and scrutiny than the legislative process, creating a unique opportunity for women's organizations to advocate for marginalized subgroups of women, such as women of color, poor women, and LGBTQ women, who the mass public has frequently seen as weak and/or undeserving of policy-related benefits (Schneider and Ingram 1993). Fourth, the fact unelected bureaucrats have fewer incentives to respond to public pressure than elected MCs also makes rulemaking an attractive policymaking venue for those who are interested in advocating for marginalized subgroups of women.

Though rulemaking presents a unique opportunity for women's organizations to influence policymaking, the existing literature on this process has not yet addressed whether and how women are represented during rulemaking, but it has frequently considered whether or not rulemaking is biased in favor of some participants over others. Recognizing that some citizens and organizations are better positioned to submit comments to rulemakers than others, much of the existing rulemaking research focuses on whether or not participants who represent business interests are more likely to be influential than other commenters because they have more resources which allow them to submit more comments and more high-quality comments that rely on empirical data, sophisticated legal arguments, or research on best practices, than other participants (Furlong and Kerwin 2005; Golden 1999; Yackee and Yackee 2006). These studies

imply that there are strong reasons to believe rulemaking may also be biased in favor of other relatively advantaged participants, such as professionalized women's organizations, rather than ordinary women, but it has not yet explicitly examined how broadly generalizable those findings are to other organized interests and advocacy organizations. Moreover, because much of the rulemaking literature is focused on the influence of businesses, it has primarily examined a relatively narrow set of rules and policy issues related to the government's role in regulating the economy. Thus, it has only rarely considered what kinds of biases might exist when the rules implement policies related to women's traditional interests in social policies related to healthcare, welfare, children, the family, the elderly, housing, and education (but see English 2016; Golden 1998; Shapiro 2008; West 2004 for notable exceptions). Building on these insights and motivated by a desire to better understand how the shift to regulatory policymaking has impacted women, I explicitly examine whether or not the women's organizations that participate in the rulemaking process submit comments that are biased in favor of some groups of women over others. I also ask whether or not rulemaking encourages women's organizations to deviate from their existing tendencies to portray women as a broad-based, homogenous group and to downplay the concerns of relatively disadvantaged or marginalized women (Beltrán 2010; Cohen 1999; Schneider and Ingram 1993; Strolovitch 2007) because this process is relatively insulated from the kinds of public pressure and scrutiny that frequently make advocating for marginalized women difficult in Congress.

Focusing on rulemaking also contributes to the growing literature that adopts new approaches to studying women's representation. To do this, I start with the assumption, drawn from theories of intersectionality, that it is difficult, if not impossible to study women's representation by asking questions about whether or not female officials take actions that

advance one pre-existing set of broadly shared women's interests (Anzaldúa 2007; Crenshaw 1989; Dovi 2002; Glenn 1999; Hill Collins 2006; hooks 1994; Lorde 2007; Mohanty 1998, 2006; Young 1994, 2000). Instead, most efforts to speak on behalf of all women are partial, falsely homogenizing, biased in favor of relatively advantaged women, and shaped by the strategic decisions that women and their advocates make about which women and which women's interests to discuss in certain policymaking contexts (Beltrán 2010; Brubaker 2004; Cassese, Barnes, and Branton 2015; Escobar-Lemmon and Taylor-Robinson 2014; Fraga et al. 2008; Strolovitch 2007). Therefore, to fully understand whether and how women are represented, I approach representation as an on-going deliberation and debate about what women's interests are rather than focusing on whether or not MCs act on behalf of a shared set of women's interests during the legislative process (Celis et al. 2014; Escobar-Lemmon and Taylor-Robinson 2014). Studying rulemaking allows to me to do that because the comments that women's organizations submit during this process and the ways that they refer to women in those comments embody the unique strategic decisions that each organization makes about how to portray women and their interests. Thus, analyzing those comments allows me to determine whether and how women's organizations represent women and their interests when they submit comments to rulemakers. Asking questions about the degree to which those comments portray women as a broad-based group with shared interests and the degree to which they prioritize the concerns of some women over others also elucidates how effectively women are represented during the rulemaking process and whether or not some women are better represented at this stage of the policymaking process than others.

To better understand how women are represented during the rulemaking process, this study answers three questions. First, how often do women's organizations participate in

rulemaking by submitting comments? Second, how do women's organizations use their comments to represent women? How do they refer to women in their comments and which subgroups of women do they focus on when they write to rulemakers? Third, how do women's organizations' references to women and to different subgroups of women vary along with changes in the rulemaking policy context? Are they more likely to refer to women and specific subgroups of women in some contexts rather than others?

DATA

To answer these questions, I compiled an original dataset derived from 1,085 comments that 472 women's organizations submitted to federal rulemakers between 2007 and 2013. I collected these comments by compiling a comprehensive list of women's organizations using the National Council of Women's Organizations Directory, Congressional Quarterly's *Washington Directory*, the Women of Color Organizations and Projects National Directory, and the literature on conservative women's organizations, and then searching for the comments they submitted on the website www.regulations.gov.[2] The regulations.gov website allows all interested citizens and organizations to review notices about the rulemaking process and to submit comments electronically, and I used it to search for all of the comments that women's organizations submitted to federal agencies between January 1, 2007 and December 31, 2013.[3] After I collected all 1,085 comments, I assembled the dataset by conducting automated text searches in NVivo to determine how many references each comment made to 107 different terms that were used to refer to women and what percentage of each comment was dedicated to those references

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[2] A full list of the women's organizations that were used to construct this dataset is available in Appendix 1.
[3] The time period for this analysis runs from January 1, 2007 to December 31, 2013 because 2007 was the first year that all of the cabinet-level agencies participated in the e-rulemaking process using regulations.gov and it concludes in 2013 because that was the most recent full year for which comments were available.

to women.[4] The automated text search data provide information about how often each comment referred to women as a universal group; subsets of women; women's ages; women's gender identities; women's races, ethnicities, or nationalities; women's relationships to others; women's sexual orientations; and women's socioeconomic statuses. I also supplemented these automated text search counts with qualitative coding to gather more information about how women's organizations referred to different subgroups of women in context.

To examine how women's organizations' references to women changed depending on the policymaking context, the dataset also includes variables that provide more information about the rulemaking contexts that women's organizations' faced when they drafted each of their comments. The first set of contextual variable considers whether or not women's organizations' references to women vary when the proposed rule includes a moral policy component in addition to a technical one. Because the existing rulemaking literature indicates that rulemaking is most often a highly technical affair that requires high levels of policy or legal expertise (Golden 1998; West 2004; Yackee 2006; Yackee and Yackee 2006), I assume that all of the rulemakings included in the dataset focused on technical policy issues. However, some rulemakings also contained a moral policymaking component, and as will be discussed in more detail below, those moral rulemakings create unique pressures that encourage women's organizations to refer to women in different ways. Thus, I code for whether or not each comment responded to a **moral and technical rule** or **technical only rule.** Following the existing morality policy literature, I coded comments as being related to a **moral and technical rule** when at least one coalition of participants could frame the rule as an issue that is related to "morality or sin" (Meier 1999; Mooney 1999, 2001). This category of rules includes rulemakings that addressed abortion and contraception coverage under the Affordable Care Act (ACA); religious freedom and conscience

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[4] The full list of search terms that are included in the dataset is listed in Appendix 2.

protections for healthcare workers; hospital visitation rights for LGBTQ people; requirements that recipients of federal HIV/AIDS funding have policies that explicitly oppose prostitution and sex trafficking; proposals to reduce sexual assault and rape in prisons and confinement facilities; the definition of LGBTQ families for the purposes of customs declarations and leave for federal workers; immigration visas for victims of sex trafficking; and access to Housing and Urban Development (HUD) programs for members of the LGBTQ community. In contrast, comments on rules with summaries that suggested that they could not be framed as issues of morality or sin were coded as comments on rules that were **technical only**. Rules in this category addressed a wide variety of issues including the implementation of the ACA and other healthcare policies, financial reform, environmental protections, immigration, labor protections, housing policies, small business policies, and federal contracting requirements.

The second set of contextual variables addresses whether or not a rulemaking received media coverage. To determine whether or not a rule received coverage, the summaries of each rule were used to develop a list of keywords about the rule and those keywords were used to conduct a search in LexisNexis for any articles that appeared in American newspapers about the proposed rule during its public comment period. Comments were coded as being related to rules that **received media coverage** when one or more of the articles that appeared in the LexisNexis search explicitly mentioned the proposed rule or the rulemaking process. In contrast, comments were coded as being related to rules that **did not receive coverage** when the LexisNexis search produced no results or when the articles that appeared in LexisNexis failed to specifically refer to the rule or the rulemaking process.

The third set of contextual variables accounts for how many organizations signed each comment. When a single organization signed the comment, it was coded as a **single**

organization comment. Conversely, when multiple organizations working together in a coalition signed a comment, the comment, it was coded as a **multiple organizations** comment.

The last set contextual variable identifies the presidential administration that conducted each rulemaking. Comments that were submitted between January 1, 2007 and January 19, 2009 were coded as comments that were to the Republican **George W. Bush administration**. Similarly, comments that were submitted between January 20, 2009 and December 31, 2013 were coded as comments that were addressed to the Democratic **Barack Obama administration**.

HYPOTHESES AND METHODS

By analyzing the data from the comments, I expect to find that women's organizations frequently participate in the rulemaking process and that they use their comments to represent women by highlighting the unique impacts that proposed rules have on women as a group. However, I also expect to find that women's organizations comments contribute to what Cathy Cohen (1999) calls the "advanced marginalization" of the most vulnerable subgroups of women because they only rarely refer to those women and their different perspectives and concerns. Throughout this study, I examine these expectations by testing a series of hypotheses about how and when women's organizations refer to women in their comments.

My first hypothesis states that women's organizations' comments should frequently refer to women to explain how proposed rules would have a unique impact on women. I expect that women's organizations will highlight the impact of policies on women because they are policy actors that primarily exist to represent women and to articulate women's interests and frame issues in ways that help women develop a shared sense of linked fate (Banaszak 2010; Goss 2013; Katzenstein 1998; Kenney 2003; Strolovitch 2007; Weldon 2011). I test this hypothesis by

examining how often women's organizations refer to women in universal terms by using words, such as "women" or "females."

Second, building on existing research that suggests that the American political system most often rewards groups that depict themselves as broad-based and deserving and that advocacy organizations often portray issues that only affect the most advantaged group members as issues that affect the entire group (Beltrán 2010; Cohen 1999; Frymer 1999; Guinier 1994; Strolovitch 2007; Williams 1998), I expect to find that women's organizations' comments refer to women in universal terms more often than they refer to particular subgroups of women. Moreover, women's organizations' tendencies to describe women as a broad-based, deserving group should be exacerbated when the rulemaking context invites higher levels of public attention and scrutiny and more compromises are required. Thus, I expect that women's organizations' comments will include more references to women in universal terms and to women's relationships to others when rulemakings contain a moral policy component and when they receive media attention. Moral policy rulemakings should create more pressures for women's organizations to portray women as a broad-based deserving group because they focus on relatively easy to understand arguments about people's core beliefs and values and they receive more attention and scrutiny in the media and the mass public, than rulemakings that focus only on technical implementation issues (Haider-Markel and Meier 1996; Meier 1999; Mooney 1999, 2001; Norrander and Wilcox 2001). Similarly, rulemakings that receive media coverage should also produce pressure to portray women as a broad-based and deserving group because media attention encourages more members of the public to follow the rulemaking process to and scrutinize the results.

My fourth hypothesis states that when multiple organizations submit comments together, women's organizations should increase the number of references they make to women in universal terms and decrease the number of references they make to all subgroups of women than when women's organizations submit comments on their own. I expect women's organizations will change their strategies based on the number of organizations that sign a comment because it should be easier to encourage other organizations to join the coalition when comments focus on the similarities between women rather than their differences.

Though I expect that women's organizations' comments will most often refer to women in universal terms and their tendencies to portray women as a broad-based, deserving group will be exacerbated in some contexts, I also expect that there are some contexts in which women's organizations will make more references to specific subgroups of women. Therefore, my fifth hypothesis states that the number of references that women's organizations make to women's ages; gender identities; races, ethnicities, and nationalities; sexual orientations; and socioeconomic statuses should increase when rulemakings are only related to technical issues and when they do not receive media coverage. I expect references to subgroups of women will increase in these contexts because they produce fewer pressures for women's organizations to refer to women as a broad-based, deserving group.

Finally, women's organizations' decisions about how to refer to women in their comments should be affected by which presidential administration conducted each rulemaking. Consequently, my last hypothesis states that women's organizations comments will include more references to women in universal terms and to all subgroups of women when they submit comments to the Obama administration than when they submit comments to the Bush administration. I expect this increased focus on women and the diversity of women will occur

under Democratic presidents because they have generally been seen as more sympathetic to women and they have included more high-level female officials since the early 1980s (Center for American Women and Politics 2015; Kaufmann and Petrocik 1999; Sanbonmatsu 2004).

To test these hypotheses, I estimate a series of count models to determine how women's organizations' references to women varied when all four of the contextual features were considered together, controlling for the number of words in each comment. I conducted a comprehensive model fit analysis to select the proper count model to regress each of the independent and control variables on each of the dependent variables (number of references to women; subsets of women; women's ages; gender identities; races, ethnicities, or nationalities; relationships to others; sexual orientations; and socioeconomic statuses).[5] Because many comments never referred to particular subgroups of women, the fit analysis often indicated that zero-inflated models best fit the data. Many of the likelihood ratio tests also showed that the data were overdispersed suggesting that negative binomial regression models also fit the data best. Thus, I conducted all of the analyses using zero-inflated negative binomial regression except for the analysis of women's organizations' references to women's races, ethnicities, or nationalities. In that case, the zero-inflated negative binomial regression model did not converge and the fit analysis indicated that a negative binomial regression was the most appropriate.

REPRESENTING WOMEN IN RULEMAKING

How Often and When Did Women's Organizations Participate?

As expected, women's organizations frequently participated in the rulemaking process. Of the 472 women's organizations that I identified, 136 (28.8%) of them submitted comments between 2007 and 2013. This group of participants includes many large women's organizations

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[5] Appendix Table 1 summarizes this analysis. I selected negative binomial models over poisson models when the likelihood ratio tests were significant and zero-inflated models over the standard models when the Vuong tests were significant. I also chose the models with the lowest AIC and BIC scores whenever possible.

that work to influence policymaking at the national level. For example, the five organizations

that submitted the largest number of comments were Planned Parenthood (159 comments), the

American Nurses Association (51 comments), the National Women's Law Center (NWLC, 48

comments), the League of Women Voters (41 comments), and the American Association of

University Women (AAUW, 37 comments). A number of other large, nationally focused

organizations, including the Center for Law and Social Policy, the Guttmacher Institute, the

National Center for Lesbian Rights, the National Center for Transgender Equality, the National

Council of La Raza, the National Gay and Lesbian Task Force, the National Latina Institute for

Reproductive Health, the National Organization for Women (NOW), the Human Rights

Campaign, Legal Momentum, Women Impacting Public Policy, and the YWCA also submitted

at least 10 comments between 2007 and 2013.[6] This diverse set of participants indicates that

while many women's organizations do not participate in rulemaking, many of the largest

women's organizations and a number of women's organizations that explicitly represent

intersectionally marginalized women, such as women of color, LGBTQ women, poor women,

and younger women, recognize the value and importance of participating in the process. Tables 1

and 2 show that on average, women's organizations submitted 3.8 comments (s=7.2) per

rulemaking and that each rulemaking received 24,204 (s=142,597) comments on average.

Though many women's organizations participate in rulemaking, not all of them write

their own comments. Sixty percent (81) of the organizations that participated drafted their own

comments, producing 715 total comments from single organizations, while the remaining 40

percent (55) of them participated by signing on to one of 370 comments with other organizations.

Though women's organizations are better able to control their messages and achieve their goals

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[6] For more information on the women's organizations that submitted comments and the number of comments that each organization submitted, please see Appendix 3.

when they write their own comments, many women's organizations likely choose to participate by signing comments with other organizations because they lack the resources, time, or expertise needed to monitor the rulemaking process and write their own comments. For example, a staff member from a small, state-level organization explained that when her organization participates in rulemaking, partnerships with other, larger organizations are critical because "they bring a lot of policy expertise that we may not even have in house," and that she could not "even begin to describe the plethora of stuff we're working on, so we only have so much time to devote to anything."[7] It is also possible that participating with other organizations makes rulemaking more accessible for women's organizations that are not located in or near Washington, DC and that are not as experienced with or involved in lobbying the federal government.

<Insert Tables 1 and 2 here>

Though scholars typically assume that women are primarily interested in issues such as health and reproductive rights, children, the elderly, the family, housing, education, and women's secondary status relative to men (Carroll, Dodson, and Mandel 1991; Mazur 2002; Reingold 1992; Saint Germain 1989; Sapiro 1981; Swers 2002; Thomas 1994), women's organizations participated in a wide variety of rulemakings, submitting comments in response to 283 different rules during the 7 years studied. As one might expect, some of the rulemakings they participated in were related to women's traditional areas of interests. For example, women's organizations participated in 113 healthcare rulemakings, many of which implemented provisions of the ACA including its provisions that outlined minimum health benefits, established the contraception mandate, established healthcare exchanges, addressed coverage for immigrant women who were eligible for the Deferred Action for Childhood Arrivals (DACA) program, and extended health insurance coverage to dependents until they reach the age of 26. Women's organizations also

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[7] Interview with women's organization staffer, August 17, 2015.

submitted comments on policies related to housing, discrimination against women in employment and education, family leave, rape and sexual assault, domestic violence, and sex trafficking. However, women's organizations also participated in a number of rulemakings that went well beyond women's traditional areas of interest. For instance, they responded to a number environmental policy rules related to fuel emissions, oil pipeline safety, the storage of spent fuel from nuclear reactors, and which species or animals should be considered endangered under the Endangered Species Act, that were often only loosely connected to women's traditional interests in health policy.

Women's organizations also participated in rulemakings that occurred in a variety of different policymaking contexts. As Tables 1 and 2 reveal, the vast majority (92.9%) of the rulemakings that women's organizations participated in and the majority of the comments they submitted (78.7%) were related to technical rules that did not have a moral policy component. The remaining 7.1% of rulemakings and 21.3% of women's organizations' comments responded to rules that had a moral policy component, and, as expected, those rulemakings generally attracted a more comments overall and more comments from women's organizations than rulemakings that were only focused on technical issues. In line with previous findings that show rulemaking generally receives low levels of public attention, Tables 1 and 2 also show that despite the fact that two-thirds of the comments that women's organizations submitted responded to rules that received media coverage, most rulemakings were not discussed in American newspapers.

Finally, Table 2 demonstrates that the majority (82.7%) of rulemakings that women's organizations participated in and the majority (82.5%) of the comments they submitted were addressed to the Obama administration. Though Democratic administrations have been more

sympathetic to women than Republican ones in recent years, there are also other reasons women's organizations participated in more Obama administration rulemakings. First, comments were only available on regulations.gov for five years of the Obama administration, but only two years of the Bush one. That being said, US Government Accountability Office (2017) data also indicate that the Obama administration issued 38.9% more major rules while it was in office than the Bush administration did, suggesting that women's organizations also had more opportunities to participate in rulemaking under Obama. Second, the e-rulemaking program and regulations.gov, which were also first established in 2002, were in their infancy during the Bush administration, so it is also possible that by the time Obama entered office, women's organizations were more experienced with and aware of the e-rulemaking program than they were during the Bush years.

Did Women's Organizations Represent Women?

When women's organizations participated in the rulemaking process, they did represent women by highlighting how the wide variety of rules they addressed impacted women. Table 3 provides a list of the words that were most frequently used in the women's organizations' comments and it shows that women's organizations' comments frequently stressed the ways that the agencies' proposed rules would impact women by using the word "women" 11,844 times, making "women" the eighth most used word in the entire set of comments. Given that many of the rules women's organizations addressed were related to the ACA, many of the words their comments used more frequently than "women," such as "health," "provide," "care," "require," "service," "state," and "plan" were related to healthcare and insurance coverage issues. Examining women's organizations' frequently used words together with these other top words indicates that not only did women's organizations use their comments to underscore the ways

that proposed rules impact women, they also used them to explain how women would be affected by some of the largest, most visible policies and programs that were being discussed.

<Insert Table 3 here>

Which Women Did Women's Organizations Represent and Discuss?

Though I expected that women's organizations' comments would represent women, I also expected to find that they would frequently be biased in favor of some women and that they would tend to refer to women in universal terms and to their relationships to others more often than they would refer to women's ages; gender identities; races, ethnicities, or nationalities; sexual orientations; and socioeconomic statuses. The results displayed in Figure 1 provide tentative support for these hypotheses, as they indicate that women's organizations' comments most often dedicated larger portions of their comments to discussing women in universal terms than to mentioning different subgroups of women. They also placed more emphasis on women's relationships to others than they did on women's ages, gender identities, sexual orientations, or socioeconomic statuses.

<Insert Figure 1 Here>

Sexual Orientation. Further disaggregating women's organizations' references to women in Figure 1 reveals that when women's organizations did refer to subgroups of women, they most often focused on differences between women based on their sexual orientations by using terms such as, "lesbians," "sexual orientation," "gay," "homosexual," "bisexual," and a number of acronyms for the broader LGBTQ community. Organizations explicitly focused on the LGBTQ community, such as the Human Rights Campaign, the National Center for Lesbian Rights, the National Center for Transgender Equality, the National Gay and Lesbian Task Force, and PFLAG, as well as larger, more broad-based women's organizations such as the AAUW,

NOW, the NWLC, and Planned Parenthood, discussed women's sexual orientation in their comments on a variety of rules. First, they referred to women's sexual orientations to discuss many ACA rules, including those related to its non-discrimination provisions, the use of electronic health records, and the contraception mandate. Second, they discussed women's sexual orientations during rulemakings on how families would be defined in terms of access to hospital visitations, eligibility for Medicaid and housing programs, and travel to the United States. Lastly, women's organizations frequently discussed sexual orientation during rulemakings on rape and sexual assault in prisons and confinement facilities and the machines that the Transportation Security Administration (TSA) uses to screen passengers at airports.

Race, Ethnicity, and Nationality. Following references to women's sexual orientations, Figure 1 indicates that references to women's races, ethnicities, and nationalities were the second most common type of difference that women's organizations discussed in their comments. Within this category, references to women from other countries, such as references to "immigrant women," "foreign born women," "DACA-eligible women," "undocumented women," and "refugee women" were the most common words that they used to address rules about the immigration status of victims of sex trafficking, ACA coverage for DACA-eligible women, the contraception mandate, the E-Verify employment verification system, labor protections for poultry processing workers, immigration bans for people with HIV/AIDS, and eligibility for programs like Medicaid, the Children's Health Insurance Program (CHIP), and public housing. Women's organizations also frequently referred to "Latinas" and "Hispanic women" when they discussed many of the issues above and when they commented on rules about Fair Labor Standard Act (FLSA) protections for domestic workers, conscience protections for healthcare workers, retirement plans, prison rape, and the Family and Medical Leave Act

(FMLA). Following references to non-native women and Latinas, references to "African American women" and "Black women" were the next most common. They were used to discuss ACA provisions about contraception, minimum benefits, healthcare exchanges, and discrimination, in addition to rules about food labeling requirements, employment requirements for educational programs that are eligible for student financial assistance, retirement benefits, wage discrimination, and the National School Lunch Program. Women's organizations made a few references to "Asian women" and "Asian Pacific Islander" women to discuss many of the same issues that impacted non-native women and Latinas. They also made one reference to "American Indian/Alaska Native women" which noted that they tend to experience higher rates of diabetes and domestic violence than women in other racial or ethnic groups. Many of the references to women's races, ethnicities, and nationalities were included in comments from organizations that explicitly focus on those intersecting identities, such as the Black Women's Health Imperative, the National Asian Pacific American Women's Forum, the National Congress of Black Women, the National Council of La Raza, the National Latina Institute for Women's Health, the New York Asian Women's Center, Sister Song, and Tewa Women United. But, 25 other organizations, including the AAUW, NOW, and the NWLC, also discussed differences between women in terms of race, ethnicity, or nationality.

Relationships to Others. Figure 1 reveals that women's organizations references to women's relationships to others were the third most common type of difference they discussed. The vast majority of the references that women's organizations made to women in these terms helped portray them as a deserving and respectable group by focusing on women's roles within the traditional family. For example, 95.6% of the references to women's relationships to others placed women in the family by referring to them as "mothers," "daughters," "wives," "married

women," or "pregnant women." In contrast, women outside of the traditional family, such as "unmarried women," "single women," "never married women," "separated women," "divorced women," "widows," and "girlfriends" only accounted for 1.5% of women's organizations' references to women's relationships.

Because women's organizations' references to women frequently portrayed women as a respectable and deserving group, they were also used to respond to a wide variety of 100 different rules, including rules related to the ACA, Medicaid, housing programs, travel to the US, school lunches, Head Start, FLSA protections, Dodd-Frank Act financial reforms, wage discrimination, the FMLA, and the No Child Left Behind Act. Recognizing the strategic value of references to women's relationships to others, 44 different women's organizations also submitted comments that discussed women in these terms and that group of commenters included large national feminist organizations (e.g. AAUW, NOW, NLWC), conservative women's organizations (e.g. Concerned Women for America), reproductive rights organizations (e.g. Planned Parenthood and NARAL), and organizations that represented women of color and LGBTQ women.

Socioeconomic Status. According to Figure 1, the fourth most common way for women's organizations to discuss the differences between women was to them to refer to women's socioeconomic statuses. When their comments discussed women in these terms, women's organizations most often referred to relatively economically disadvantaged women like, "disadvantaged women," "homeless women," "incarcerated women," "indigent women," "poor women," "uninsured women," "women living in poverty," and "women of limited means." References to those disadvantaged women accounted for 52.2% of the references women's organizations made to women's socioeconomic statuses. Unsurprisingly, many of those terms

were used to respond to rules that implemented provisions of the ACA, but they were also used to discuss rulemakings related to Medicaid coverage, homeless assistance programs, FLSA protections for domestic service workers, equal pay, childcare, and reproductive rights. Once again some of the organizations that referred to women in these terms, such as 9 to 5: The National Association of Working Women, explicitly represented women based on their socioeconomic statuses, but a number of other organizations, including many of the large broad-based feminist organizations, organizations that represent women of color, and reproductive rights organizations also addressed the unique impact of proposed rules on economically disadvantaged women.

Additionally, approximately one-third (31.1%) of women's organizations' references to women's socioeconomic statuses were used to explicitly focus on women-owned businesses and companies. Many of the comments that referred to those businesses responded to rulemakings that focused on issues such as affirmative action and wage discrimination among federal contractors and policies focused on small businesses or businesses owned by disadvantaged groups. The commenters who referred to women's businesses most closely resembled the business and trade organizations that are frequently associated with the rulemaking process (Furlong and Kerwin 2005; Golden 1998; Yackee 2006; Yackee and Yackee 2006), as this group included organizations such as the Business and Professional Women's Foundation, the Center for Women's Business Research, the National Association of Women Business Owners, the National Women's Business Council, the Women's Business Development Center, Women Construction Owners & Executives USA, and Women Impacting Public Policy. Similarly, women's organizations also referred to employed women (e.g. "female employees," "women employees," "women workers," "working class women," and "working women"), 11.8% of the

times they discussed women's socioeconomic statuses. Comments that mentioned employed women responded to a number of rulemakings related to laws, such as the ACA, the FMLA, and the FLSA, which affected women's relationships with their employers.

A small number (4.7%) of women's organizations' comments also explicitly referred to relatively advantaged women, such as "college-educated women," "high-income women," "middle income women," and "moderate income women." However, when women's organizations mentioned advantaged women, they often used those references to compare relatively disadvantaged women to others as a way of demonstrating the importance of policies, such as the ACA or the contraception mandate, for lower-income women. The small number of references to relatively advantaged women that were actually used to lobby for them were included in comments that explained how rules related to student loans, the wage gap, or dependent health insurance coverage could benefit college-educated women.

Gender Identity. Women's organizations' comments also refer to women's differences in terms of gender identity by using terms such as "transgender," "gender identity," "intersex," "gender non-conforming," "transgender women," "gender expression," and "transgender men," but Figure 1 shows that those references to gender identity were quite rare. When women's organizations did discuss women in these terms, they frequently focused on many of the same issues they discussed when they mentioned women's sexual orientations, only focusing explicitly on gender identity in their comments on rape and sexual assault in prisons and confinement facilities, discrimination and the ACA, access to HUD's homeless assistance programs, the TSA's passenger screening procedures, assistance for crime victims, and conscience protections for healthcare workers. As with references to sexual orientation, many of the commenters who mentioned women's gender identities explicitly represented the LGBTQ community, including

the National Center for Transgender Equality, the Human Rights Campaign, the National Center for Lesbian Rights, and the National Gay and Lesbian Task Force. However, at times, larger feminist organizations, reproductive rights organizations, and health policy organizations also focused on gender identity.

Age. Lastly, Figure 1 reveals that women's organizations least often referred to women in terms of their age differences. In fact, many of the references they made to women's ages had little substantive content related to the different ways that women experience issues due to their ages because 47.8% of these references were actually references to "women and girls." Thus, when women's organizations referred to women's ages, they most often did so in ways that actually made women as a group appear to be even larger. That being said, the remaining references to women's ages referred to "girls, "women of child bearing age," "women of reproductive age," and older women. References to girls were used to discuss rules related to prison rape prevention, the Youth Build Program, Medicaid, CHIP, the No Child Left Behind Act, and contraception. References to fertile women were used to discuss Medicaid eligibility, CHIP, and reproductive rights. Lastly, references to older women (e.g. "elderly women," "mature women," "menopausal women," "older women," "post menopausal women," and "senior women") were included in comments on the ACA, the FMLA, retirement security programs, Medicare, and Medicaid.

When Did Women's Organizations Refer to Women and Different Groups of Women?

After I examined how women's organizations referred to women and to different subgroups of women in their comments, I conducted a series of count model analyses to test my hypotheses about how women's organizations' references to women shifted along with changes in the policymaking context. The next section provides an overview of those results.

References to Women in Universal Terms. I expected that women's organizations would increase the number of references they made to women in universal terms when they participated in rulemakings that had a moral policy component, when rulemakings received media coverage, and when they signed on to comments with other organizations. As shown in Table 4, I tested those hypotheses by regressing the number of references women's organizations made to women in universal terms on the four context variables and a control variable for the number of words in each comment. The results of those analyses provide partial support for my hypotheses because they indicate that, controlling for all other factors, when women's organizations submitted comments on rulemakings that had a moral component, they significantly increased the number of references they made to women in universal terms by 59.8%. Similarly, when women's organizations participated in rulemakings that American newspapers covered, they significantly increased the number of references they made to women in universal terms by 47.6%, holding all else equal. However, the results in Table 4 also reveal that, controlling for other factors, women's organizations actually significantly decreased, rather than increased (as I expected), the number of references that they made to women in universal terms by 16.3%, when they signed on to comments with other organizations.

<Insert Table 4 Here>

References to Subsets of Women. In general, I also expected to find that women's organizations would be more likely to refer to subsets of women in the aggregate and to women's ages; gender identities; races, ethnicities, and nationalities; sexual orientations, and socioeconomic statuses when they participated in rulemakings that did not contain a moral policy component and did not receive media coverage, and when they submitted comments on behalf of only their own organizations. The results in Tables 4 and 5 provide partial support for this

hypothesis as well. As expected, holding all else equal, women's organizations significantly decreased the number of references they made to subsets of women in the aggregate by 19.3% when rulemakings received media coverage. In those cases, the chances that women's organizations would fail to mention women's sexual orientations also increased by 117.6%. Thus media coverage encouraged women's organizations to avoid discussing women in terms of their sexual orientations. However, contrary to my expectations, media coverage also actually significantly increased the number of references that women's organizations made to women's ages by 125.9% and the number of references they made to women's socioeconomic statuses by 76.2%, holding all else equal. It is likely that media coverage actually increased, rather than decreased references to women's ages because women's organizations often used the phrase "women and girls" to help portray women as a broad-based group and such portrayals of women are strategically useful when issues receive more public attention. It is also possible that media attention also increased references to women's socioeconomic statuses because many of those references to women's class were used to respond to the large number of rulemakings related to the ACA.

Contrary to my expectations, the results in Tables 4 and 5 also indicate that whether or not a rule has a moral policy component has no effect on whether or not women's organizations increase the number of references that women's organizations make to subsets of women in the aggregate and to women's ages; gender identities; races, ethnicities, or nationalities; sexual orientations; or socioeconomic statuses. All else equal, having a moral policy component also significantly decreased the number of times that women's organizations completely failed to mention women's sexual orientations or socioeconomic statuses, by 65% and 62% percent respectively. It is likely that those results are due to the fact that many moral policies directly

address issues of sexual orientation and many of them also focus on reproductive rights, making it difficult to avoid issues related to women's sexual orientations and socioeconomic statuses.

The results displayed in Tables 4 and 5 also largely disproved my hypothesis that women's organizations would be less likely to refer to subgroups of women when they signed on to comments with other organizations. Holding all else equal, signing on to comments with other organizations did significantly decrease the number of references that women's organizations made to women's gender identities (as expected), but it unexpectedly actually increased the number of references they made to subsets of women in the aggregate by 26.6%, the number of references they made to women's races, ethnicities, or nationalities by 231.1%, and the number of references they made to women's socioeconomic statuses by 153.1%. Therefore, working with other women's organizations was actually often a useful way for women's organizations to increase their focus on a number of subgroups of women.

References to Women's Relationships. Though the count model analyses only partially confirmed my hypotheses about women's organizations' references to many subgroups of women, they did confirm my hypotheses that women's organizations would be more likely to refer to women's relationships when women's organizations commented on rulemakings when they contained a moral policy component and they received media attention. In those cases and holding all else equal, women's organizations significantly increased the number of references they made to women's relationships by 53.1% and 33.1% respectively. Tables 4 and 5 also indicate that my expectation that women's organizations would be less likely to refer to women's relationships to others when they signed on to comments with other organizations was met as the number references that women's organizations made to women's relationships significantly decreased by 53.5% when that condition was met, holding all else constant.

Presidential Administration. Lastly, I expected to find that women's organizations'

comments would include more references to women in universal terms and to all subsets of

women when they submitted comments to the relatively sympathetic Obama administration than

to the Bush one. Once again, this expectation was partially met. Table 4 shows that holding all

else equal, when women's organizations wrote to the Obama administration, they significantly

increased the number of references they made to women in universal terms by 48.0% and the

number of references they made to subgroups of women in the aggregate by 26.6%.

Disaggregating those results further in Table 5 shows that, holding all else equal, women's

organizations significantly increased the number of references they made to women's gender

identities and relationships to others when they wrote to the Obama administration. It also

significantly decreased the chances that women's organizations would avoid mentioning

women's sexual orientations at all. However, contrary to my expectations, Table 5 also shows

that the presence of Obama administration officials during the rulemaking process had no effect

on the number of references women's organizations made to women's races, ethnicities,

nationalities, or socioeconomic statuses.

DISCUSSION AND IMPLICATIONS

Altogether, my findings indicate that when women's organizations participate in the

rulemaking process, they do represent women by using their comments to shine a light on the

ways that proposed rules have a unique impact on women as a group. However, the

representation that women's organizations provide for women is also often biased in favor of

references to women that depict them as a broad-based group, by referring to them in universal

terms or as part of a larger group of "women and girls." Similarly, women's organizations

comments also generally contain fewer references to different subgroups of women and to some

of the most vulnerable subgroups of women, such as women of color, LGBTQ women, and poor women, in particular. Thus, this study of which women that women's organizations represent during rulemaking buttresses the results of previous studies which suggest that advocacy organizations that seek to represent women and members of other marginalized groups often provide them with another form of representation that is falsely homogenizing and biased in favor of relatively advantaged group members (Beltrán 2010; Cohen 1999; Frymer 1999; Guinier 1994; Strolovitch 2007; Williams 1998). It also builds on some of those previous findings by showing that these biases in representation are more likely to occur when the policies or rules being considered receive media coverage and contained a moral policy component. Those components have the potential to exacerbate the bias towards homogeneity because they encourage women's organizations to increase the number of references they make to women in universal terms and to their relationships to others, rather than encouraging them to make fewer references to differently situated subgroups of women. Thus, when those two conditions are met, women's organizations references to women as a broad-based, deserving group essentially crowd out references that women's organizations make to subgroups of women.

That being said, this study also provides some indications that there are a few situations and policymaking contexts that do encourage women's organizations to deviate from their tendencies to focus on women in broad-based, homogeneous terms to discuss the concerns of some of the most vulnerable subgroups of women. Contrary to my expectations, women's organizations actually often increased the number of references they made to subgroups of women and to women's races, ethnicities, nationalities, and socioeconomic statuses when they signed on to comments with other organizations. Thus, it appears that rulemaking can help improve the representation that at least some intersectionally marginalized women receive when

it encourages women's organizations to work together to write comments. These findings are also in line with previous research, which suggests that coalition work can be a bit a double edged sword for advocacy organizations that work on behalf of marginalized groups. On the one hand, they provide organizations with increased opportunities to participate in policymaking and to share scare information and resources (Strolovitch 2007). However, coalitions also at times, replicate the same biases towards homogeneity that harm disadvantaged subgroups or women within single organizations (Strolovitch 2007). Therefore, it is somewhat unsurprising that writing with other organizations helped increase the level of attention that women's organizations paid to women's races, ethnicities, nationalities, and socioeconomic statuses, but not the attention they paid to women's gender identities and/or sexual orientations. It is possible that one reason women's organizations focused more on women's races, ethnicities, and nationalities, than their other overlapping identities is early theories of intersectionality, such as Kimberlé Crenshaw's pathbreaking (1989) piece, primarily focused on the intersection of race and gender, so women's organizations have been a bit slower to broaden their intersectional approaches and focus on women's gender identities and sexual orientations as well. It is also possible that one reason women's organizations have not focused more on women's sexual orientations and gender identities is that public opinion has only recently started to shift in favor of non-heterosexual people and questions of gender identity are still quite controversial and frequently misunderstood within the broader public, making it harder to form coalitions that could support those intersectionally marginalized women.

While my findings generally confirmed my expectations that women's organizations' would focus more on women and on subgroups of women when they submitted comments to the relatively friendly Obama administration, it was somewhat surprising that women's

organizations did not increase the number of references they made to women's races, ethnicities, nationalities, or socioeconomic statuses when they wrote to them. It is difficult to know exactly why this is the case, but it is possible that one reason women's organizations' references to race, ethnicity, and nationality did not increase under the Obama administration was that they felt that with President Obama serving as the nation's first Black president, the administration may have already been interested in and attuned to the ways that proposed rules had a unique impact on people based on their races and ethnicities. Therefore, they may have made the strategic decision to avoid potentially controversial references to race and focused on discussing other issues instead. It was also surprising that women's organizations did not increase the number of references they made to women's socioeconomic statues when they wrote to a Democratic administration. In that case, it is possible that one reason that women's organizations' comments did not include more references to class was that many of the rulemakings that occurred under the Obama administration, particularly the rulemakings related to the ACA, were centrally about class, indicating that bureaucrats already understood and were aware of the socioeconomic dimensions of those issues.

Lastly, while my findings provide initial evidence that suggest that women's organizations make strategic decisions about how to represent women during rulemaking, the results of this study can only be used to speculate or make inferences about what those strategic calculations may have been. Thus, further research, including surveys of rulemaking participants and interviews with the staffers that actually wrote these comments is needed to fully understand the strategy behind why women's organizations comments' tend to be biased in favor of some women over others. It is also important to note that the time intensive nature of data collection related to rulemaking means that this study only examines women's organizations participation

in rulemaking over the course of 7 years. As automated forms of text analysis and webscraping technology develop further, additional research should also be conducted to see if these results are generalizable to women's organizations' participation in a wider variety of rulemaking contexts and administrations.

CONCLUSION

Although rulemaking is a relatively unknown component of the rulemaking process and an understudied component of women's organizations' lobbying strategies, this study has shown that when women's organizations participate in this process, they provide women with an important form of representation. The comments that a wide variety of women's organizations submit contribute to the construction of women's interests from the ground up by highlighting the ways that policies impact women and different subgroups of women, drawing our attention to the ways many rules have gendered implications. However, it also shows that American women are not necessarily fully and equally represented at this stage of the policymaking process. Instead, when women's organizations participate in rulemaking, they are likely to replicate biases that occur in other policymaking venues by most often portraying women as a broad-based and deserving group, and downplaying the unique ways that policies impact many of the most vulnerable groups of women such as women of color, LGBTQ women, and poor women. However, even though those biases exist, this study also indicates when women's organizations cooperate with each other to participate in the rulemaking process, the comments that they submit together do help shine a light on the ways policies do have a unique impact on women in terms of their races, ethnicities, nationalities, or socioeconomic statuses.

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Table 1: Overview of Rules Women's Organizations Addressed (2007-2013)

	Number of Rules (% of Total)	Mean Comments per Rule	Standard Deviation	Median Comments per Rule	Minimum Comments per Rule	Maximum Comments per Rule
Issue Type						
Moral and Technical	20 (7.1%)	43,829	121,953	170	2	472,082
Technical Only	263 (92.9%)	22,682	144,168	242	2	2,057,279
Media Coverage						
Received Coverage	92 (32.5%)	63,595	240,410	13,512	32	2,057,279
No Coverage	191 (67.5%)	5,346	38,835	118	2	376,158
Administration						
Obama	234 (82.7%)	27,912	155,462	231	2	2,057,279
Bush	49 (17.3%)	5,504	25,937	287	2	173,791
Total	**283**	**24,204**	**142,597**	**238**	**2**	**2,057,279**

Table 2: Overview of Women's Organizations' Comments on Rulemakings (2007-2013)

	Number of Comments (% of Total)	Mean Comments Per Rule	Standard Deviation	Median Comments per Rule	Minimum Comments per Rule	Maximum Comments per Rule
Issue Type						
Moral and Technical	231 (21.3%)	11.6	18.8	2	1	69
Technical Only	854 (78.7%)	3.2	5.1	2	1	46
Media Coverage						
Received Coverage	690 (63.6%)	7.1	10.8	3	1	69
No Coverage	395 (36.4%)	2.3	3.7	1	1	41
Administration						
Obama	895 (82.5%)	3.8	7.3	2	1	69
Bush	190 (17.5%)	3.9	7.1	2	1	41
Total	**1,085**	**3.8**	**7.2**	**2**	**1**	**69**

Table 3: Top Words in Women's Organizations' Comments (2007-2013)

Rank	Word	Mentions
1	health	23,922
2	provid	17,462
3	care	16,331
4	requir	15,152
5	servic	14,191
6	state	13,752
7	plan	12,582
8	**women**	**11,844**
9	rule	11,149
10	propos	11,019
11	coverag	10,663
12	will	10,214
13	includ	9,761
14	program	9,150
15	individu	8,448

Figure 1: Women's Organizations' References to Women Per Comment (2007-2013)
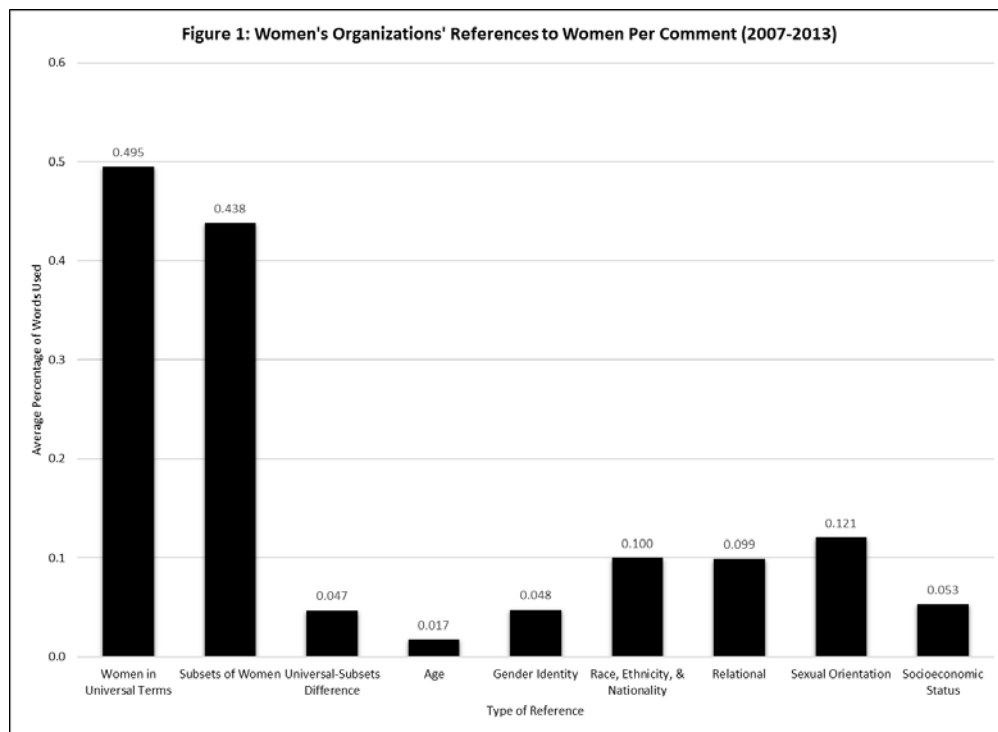
Table 4: Context and References to Women in Universal Terms and to Subsets of Women in Women's Organizations' Comments (2007-2013)

	Universal Women (Zero Inflated Negative Binomial)	% Change in Expected Count	Subsets of Women (Zero Inflated Negative Binomial)	% Change in Expected Count
Coefficients for Cases with Counts that are Not Always Zero				
Moral and Technical	0.47*** (0.10)	59.8***	0.10 (0.13)	10.2
Received Media Coverage	0.39*** (0.09)	47.6%***	-0.21* (0.12)	-19.3**
Obama	0.39*** (0.12)	48.0***	0.74*** (0.14)	108.7***
Multiple Organizations Author	-0.18* (0.10)	-16.3***	0.24** (0.12)	26.6**
Word Count	0.0002*** (0.00002)	0.0***	0.0002*** (0.00002)	91.0***
Constant	1.01*** (0.12)		1.25*** (0.16)	
Coefficients for Cases with Counts that are Always Zero				
Moral and Technical	-24.95 (107,425.60)	-100.0	-13.59 (445.47)	-100.0
Received Media Coverage	-0.60 (0.53)	-44.9	-0.53* (0.32)	-41.0*
Obama	-1.02* (0.59)	-63.8***	2.02* (1.10)	656.4*
Multiple Organizations Author	15.08 (650.78)	350,000,000.0	0.82*** (0.33)	127.4***
Word Count	-0.00002 (0.00004)	0.0	-0.0010*** (0.0004)	-0.1***
Constant	-15.43 (650.78)		-1.67 (1.12)	
/ln alpha	0.49***		0.87***	
alpha	1.64		2.38	
Log Likelihood	-3.269.129		-3,044.737	
LR Chi^2	237.73*** (df=5)		206.03*** (df=5)	
N	1,085		1,085	
N$_{Non-Zero}$	831		698	
N$_{Zero}$	254		387	

Notes: ***p≤0.01, **p≤0.05, *p≤0.10

Table 5: Context and References to Subsets of Women in Women's Organizations' Comments (2007-2013)

	Age Terms (Zero-Inflated Negative Binomial)	Gender Identity Terms (Zero-Inflated Negative Binomial)	Race, Ethnicity, Nationality Terms (Negative Binomial)	Relational Terms (Zero-Inflated Negative Binomial)	Sexual Orientation Terms (Zero-Inflated Negative Binomial)	Socioeconomic Status Terms (Zero-Inflated Negative Binomial)
Coefficients for Cases with Counts that are Not Always Zero						
Moral and Technical	0.10	0.61	-0.07	0.41**	0.55	-0.08
	(0.32)	(0.39)	(0.36)	(0.19)	(0.37)	(0.22)
Received Media Coverage	0.82***	-0.42	-0.23	0.29*	-0.43	0.55**
	(0.27)	(0.31)	(0.29)	(0.16)	(0.30)	(0.23)
Obama	-0.58	0.97	0.39	0.81***	0.72	-0.27
	(0.36)	(0.60)	(0.37)	(0.19)	(0.56)	(0.24)
Multiple Organizations Author	-0.39	-0.63*	1.20***	-0.77***	-0.01	0.93***
	(0.28)	(0.35)	(0.30)	(0.18)	(0.32)	(0.23)
Word Count	0.00007***	0.0002***	-0.000007	0.0001***	0.0005	0.00004
	(0.00002)	(0.00005)	(0.00004)	(000002)	(0.00003)	(0.00002)
Constant	-0.66*	-4.11	-0.47	-0.06	1.02*	-0.14
	(0.36)	(0.64)	(0.43)	(0.21)	(0.59)	(0.31)
Coefficients for Cases with Counts that are Zero						
Moral and Technical	-0.82	-0.43	NA	-1.64***	-1.04**	-0.97**
	(0.66)	(0.66)		(0.43)	(0.47)	(0.50)
Received Media Coverage	1.37**	0.59	NA	-0.72**	0.78*	-1.06***
	(0.71)	(0.59)		(0.35)	(0.44)	(0.38)
Obama	-0.52	-1.74*	NA	1.98***	-1.92***	0.49
	(0.60)	(1.03)		(0.64)	(0.73)	(0.44)
Multiple Organizations Author	0.79	-1.23	NA	0.63*	-0.70	2.34***
	(0.68)	(1.11)		(0.38)	(0.56)	(0.38)
Word Count	-0.001***	-0.002***	NA	-0.001***	-0.002***	-0.0003***
	(0.0004)	(0.0005)		(0.0004)	(0.0004)	(0.0001)
Constant	1.13	4.28***	NA	0.42	4.68***	0.41
	(0.71)	(1.21)		(0.70)	(0.97)	(0.56)
/ln alpha	1.45***	2.44***	2.98	1.06***	2.33***	0.92***
alpha	4.28	11.45	19.77	2.89	10.27	2.51
Log Likelihood	-666.5373	-876.0324	-881.45261	-1,678.083	-1,081.694	-1,037.426
LR Chi² (df=5)	31.94***	34.10***	20.42***	187.39***	9.44*	27.51***
N	1,085	1,085	1,085	1,085	1,085	1,085
N_Non-Zero	158	154	NA	396	175	265
N_Zero	927	931	NA	689	910	820
Notes: ***p≤0.01, **p≤0.05, *p≤0.10						

Table 6: Context and Percent Change in References to Subsets of Women in Women's Organizations (2007-2013)

	Age Terms	Gender Identity Terms	Race, Ethnicity, Nationality Terms	Relational Terms	Sexual Orientation Terms	Socioeconomic Status Terms
Cases with Counts that are Not Always Zero						
Moral and Technical	10.2	84.5	-6.4	51.3**	73.5	-7.6
Received Media Coverage	125.9***	-34.1	-20.9	33.1*	-35.3	72.6**
Obama	-44.1	163.5*	47.1	124.7***	104.9	-23.4
Multiple Organizations Author	-32.5	-46.5*	231.1***	-53.5***	-1.1	153.1***
Word Count	0.0***	0.00***	0.0	0.0***	0.0	0.0
Cases with Counts that are Zero						
Moral and Technical	-56.1	-35.0	NA	-80.7***	-65.0**	-62.1**
Received Media Coverage	291.7**	80.3	NA	-51.2**	117.6*	-65.3***
Obama	-40.8	-82.4*	NA	622.2***	-85.3***	62.6
Multiple Organizations Author	119.6	-70.8	NA	87.5*	-50.3	938.5***
Word Count	-0.1***	-0.2***	NA	-0.1***	-0.2***	0.0***
Notes: ***p≤0.01, **p≤0.05, *p≤0.10						

Appendix 1: List of Women's Organizations Used to Construct the Dataset in of Women's Organizations' Comments Submitted between 2007 and 2013

Organizations in Bold Submitted Comments; *Organizations submitted their own original comments

1) **9 to 5: National Association of Working Women***
2) ABIL Episcopal Women
3) **Abortion Care Network**
4) **ACLU Women's Rights Project***
5) African American Women's Clergy
6) African American Women's Institute
7) African Ancestral Lesbians United for Social Change
8) Alcoholism Center for Women
9) Alexandria Commission for Women
10) Alice Paul Institute
11) Alliance for National Defense
12) Alliance for Women in Media Information
13) Alliance for Women in the Media
14) Alliance of Faith and Feminism
15) Alpha Kappa Alpha
16) **American Association of University Women***
17) **American College of Nurse-Midwives***
18) **American College of Obstetricians and Gynecologists***
19) American Gold Star Mothers
20) American Indian Women's Service League
21) American Medical Women's Association
22) American News Women's Club
23) **American Nurses Association***
24) American Sexual Health Association
25) American Society of Reproductive Medicine
26) American War Mothers
27) American Women in Radio and Television
28) Apna Ghar
29) Aquinas College Women's Studies Center
30) Asha Family Services
31) Asian American Women's Alliance
32) Asian Immigrant Women Advocates
33) Asian Pacific American Women's Association
34) Asian Pacific Islander Lesbian and Bisexual Women's Network
35) Asian Pacific Islanders for Reproductive Health
36) Asian Pacific Women's Leadership Institute
37) Asian Pacific Women's Network
38) Asian Sisters in Action
39) Asian Task Force Against Domestic Violence

40) Asian Women United of California

41) Asian Women's Home /Asian Americans for Community Involvement

42) Asian Women's Resource Center

43) Asian Women's Self-Help Association

44) Asian Women's Shelter

45) Asian-Indian Women in America

46) Association for Advancement of Hmong Women in Minnesota

47) Association for Women in Communications

48) **Association for Women in Science**

49) Association of Academic Women's Health Programs

50) Association of Black Women Historians

51) Association of Black Women in Higher Education

52) Association of Chinese University Women

53) **Association of Maternal and Child Health Programs***

54) **Association of Reproductive Health Professionals***

55) Association of Women in International Trade

56) Association of Women's Health, Obstetric, and Neonatal Nurses

57) Aswalos House

58) Bay Area Black Nurses Association

59) Bay Area Network of Latinas

60) BIHA Women in Action

61) Black Lesbian Support Group

62) Black Women in Sisterhood for Action

63) Black Women in Sports Foundation

64) Black Women Organized for Educational Development

65) Black Women Physicians Project

66) Black Women United for Action

67) Black Women's Agenda

68) Black Women's Forum

69) **Black Women's Health Imperative***

70) Black Women's Network

71) Black Women's Political Crusade

72) Blacque Gyrlz

73) B'nai B'rith Women

74) **Break the Chain Campaign**

75) **Breast Cancer Network of Strength**

76) Bridges, Branches, and Braids

77) Bronx Lesbians United in Sisterhood

78) **Business and Professional Women's Foundation***

79) **California Black Women's Health Project**

80) California Indian Basketweavers Association

81) Cambodian Women for Progress

82) Caribbean Women's Health Association

83) Casa Myrna Vazquez

84) **Catholics for Choice***

85) **Center for Advancement of Public Policy**

86) Center for Ethics in Action

87) **Center for Health and Gender Equity**

88) **Center for Law and Social Policy***

89) Center for Partnership Studies

90) **Center for Reproductive Rights***

91) Center for Research on Women

92) Center for the Child Care Workforce

93) **Center for Women Policy Studies**

94) **Center for Women's Business Research**

95) Center for Women's Economic Alternatives

96) Central California Center for Asian Women

97) **Charlotte Lozier Institute**

98) Chi Eta Phi Sorority

99) Chicago Foundation for Women

100) Chicana Service Action Center

101) Chicana/Latina Foundation of Northern California

102) Chicana/Latina Research Center and Institute

103) Chinese Women's Club of Honolulu

104) **Choice USA***

105) Christian Women of Elegance

106) **Church Women United**

107) Clare Booth Luce Policy Institute

108) **Clearinghouse on Women's Issues**

109) Coalition for Women's Economic Development

110) **Coalition of Labor Union Women***

111) Coast to Coast National Women Artists of Color

112) **Codepink**

113) Co-Ette Club

114) Co-Madres

115) Comision Femenil Mexicana Nacional

116) Committee on South Asian Women

117) Committee on Women in Asian Studies

118) Community Overcoming Relationship Abuse

119) Community Programs Against Sexual Assault

120) Concerned Cultural Women Collective

121) **Concerned Women for America***

122) Cornell Institute for Women and Work

123) Counseling for Women

124) Daughters of American Colonists

125) Daughters of Hawaii

126) Daughters of the American Revolution

127) **DC Rape Crisis Center**

128) Defensa de Mujeres
129) **Delta Sigma Theta Sorority**
130) Detroit Black Nurses Association
131) **Dialogue on Diversity**
132) Digital Sisters
133) Dignity USA
134) Dominican Women's Development Center
135) **Eagle Forum***
136) Eating Disorders Coalition for Research, Policy, and Action
137) Educated Latinas/Chicanas Leading America
138) Emerging Women Projects
139) EMILY's List
140) Enrich for Latinas Leading to Advancement
141) **Equal Rights Advocates***
142) Equal Visibility Everywhere
143) Equality Now
144) ERA Summit
145) FAIR Fund
146) Family Rights and Dignity
147) **Federally Employed Women**
148) Federation of Buddhist Women's Associations
149) Federation of Organizations for Professional Women
150) Feminist Caucus of the American Humanist Association
151) **Feminist Majority Foundation**
152) Feminists for Life
153) Filipino American Women's Network
154) Financial Women International
155) Florida Women's Consortium
156) **Foundation for Women's Health**
157) Friends of the Missouri Women's Council
158) **Fuerza Unida***
159) Gabriela Network
160) Gamma Phi Delta Sorority
161) Garment Workers' Justice Center
162) Gay & Lesbian Victory Fund and Leadership Institute
163) Gay and Lesbian Activists Alliance of Washington
164) Gender Action
165) Gender Public Advocacy Coalition
166) **General Federation of Women's Clubs**
167) Girl Scouts of the USA
168) Girl Start
169) **Girls Inc.**
170) Green Bay Hmong Women's Organization
171) **Guttmacher Institute***

172) HACER- Hispanic Women's Center

173) HADDASAH

174) Haitian Women's Program

175) HealthyWomen

176) Helping our Pain and Exhaustion

177) Hermanas Unidas

178) Hispanic Women's Council

179) Hmong American Women's Association

180) Honoring Our New Ethnic Youth

181) Hostos Center for Women's and Immigrants Rights

182) **Human Rights Campaign***

183) Hysterectomy Educational Resources and Services (HERS) Foundation

184) **Independent Women's Forum***

185) Indigenous Women's Network

186) **Institute for Women's Policy Research***

187) InterAction Commission on the Advancement of Women

188) International Black Women for Wages on Housework

189) **International Center for Research on Women**

190) International Cross-Cultural Black Women's Studies Institute

191) International Resource Network for Women of African Descent

192) International Women's Democracy Center

193) International Women's Media Foundation

194) International Women's Rights Action Watch

195) InterRacial Sisterhood Project

196) Japanese Society of Detroit Women's Club

197) Japanese Women's Society of Honolulu

198) Jenessee Center

199) **Jewish Women International**

200) **Junior League***

201) **Korean American Women in Need**

202) Korean Women's Association of Greater Philadelphia

203) La Mujer Obrera

204) Laguna Family Services

205) Las Hermanas

206) Latina Roundtable of Health and Reproductive Rights

207) Latinas Somos

208) **Law Students for Reproductive Justice***

209) Leadership America

210) **Leadership Conference on Civil Rights***

211) **Leadership Conference of Women Religious***

212) **League of Women Voters***

213) **Legal Momentum***

214) Lesbian Herstory Archives

215) Log Cabin Republicans

216) Low-Income Families Empowerment Through Education
217) Maat Dompim
218) **MANA**
219) Manavi
220) March for Life Fund
221) Mary McLeod Bethune Counsel House
222) **Maryland Women's Coalition for Health Care Reform***
223) Mattachine Society of Washington
224) Maura Clark - It Ford Center
225) Metropolitan Atlanta Coalition for 100 Black Women
226) Million Mom March with the Brady Campaign
227) Minerva Center
228) Minnesota Indian Women's Resource Center
229) **Moms Rising***
230) Mothers at Home
231) Motherstone
232) **Ms. Foundation for Women**
233) Mujeres Activas en Letras y Cambio Social
234) Mujeres Latinas en Accion
235) **Mujeres Unidas***
236) Mujeres Unidas in Accion
237) Mujeres Unidas in Activas
238) Na'Amat
239) Najda - Women Concerned about the Middle East
240) **NARAL***
241) Narika
242) **National Abortion Federation***
243) **National Alliance for Caregiving**
244) **National Asian Pacific American Women's Forum***
245) National Asian Women's Health Organization
246) National Assocation for Colored Women's Clubs
247) National Association for Commissions of Women
248) **National Association for Female Executives**
249) National Association for Girls and Women in Sport
250) National Association for Professional Asian American Women
251) National Association for Women in Education
252) National Association of Black Women Attorneys
253) National Association of Collegiate Women Athletic Administrators
254) National Association of Colored Women's Clubs
255) **National Association of Hispanic Nurses**
256) National Association of Media Women
257) National Association of Military Widows
258) **National Association of Mothers' Centers***
259) National Association of Negro Business and Professional Women's Clubs Inc.

260) National Association of Nurse Practioners in Women's Health

261) National Association of Orthopedic Nurses

262) **National Association of Women Business Owners***

263) **National Black Nurses Association**

264) National Black Sisters Conference

265) National Black Women's Health Project

266) National Black Women's Political Leadership Caucus

267) **National Breast Cancer Coalition***

268) National Center for Education in Maternal and Child Health

269) **National Center for Lesbian Rights***

270) **National Center for Transgender Equality***

271) **National Coalition Against Domestic Violence**

272) National Coalition of 100 Black Women

273) **National Coalition of Abortion Providers**

274) **National Coalition of American Nuns**

275) **National Committee for a Human Life Amendment***

276) National Committee for Women for A Democratic Iran

277) **National Committee on Pay Equity***

278) National Conference of Puerto Rican Women

279) **National Congress of Black Women***

280) National Council for Research on Women

281) National Council of Administrative Women in Education

282) **National Council of Catholic Women***

283) **National Council of Jewish Women***

284) **National Council of La Raza***

285) **National Council of Negro Women**

286) National Council of Women of the United States

287) **National Council of Women's Organizations**

288) **National Crittenton Foundation**

289) **National Family Planning and Reproductive Health Association***

290) **National Federation of Press Women**

291) National Federation of Republican Women

292) National Foundation for Women Legislators

293) **National Gay and Lesbian Task Force***

294) National Girls' Collaborative Project

295) National Hispana Leadership Institute

296) National Hook Up for Black Women

297) National Latina Health Organization

298) **National Latina Institute for Reproductive Health***

299) National Latinas Caucus

300) National League of American Pen Women

301) National Lesbian and Gay Journalists Association

302) **National Network of Abortion Funds**

303) **National Organization for Women***

304) **National Partnership for Women and Families**

305) **National Research Center for Women and Families***

306) **National Right to Life Committee***

307) National Society of Colonial Dames of America

308) National Society of Colonial Dames XVII Century

309) National Union of Eritrean Women

310) National Woman's Party

311) **National Women's Business Council***

312) **National Women's Conference Committee**

313) National Women's Hall of Fame

314) National Women's Health Information Center

315) National Women's Health Network

316) National Women's History Museum

317) National Women's History Project

318) **National Women's Law Center***

319) **National Women's Political Caucus**

320) National Women's Studies Association

321) Native American Women's Health Education Resource Center

322) Neighborhood Women of Williamsburg/Greenpoint

323) Network of East-West Women

324) Network of Enlightened Women

325) **New York Asian Women's Center***

326) New York Association of Black Women Attorneys

327) Non-Traditional Employment for Women

328) Northwest Women's Law Center

329) Onyx Woman

330) Operation Rescue

331) Organizacion en California de Lideres Campesinas

332) Organization for the Relief of Underprivileged Women and Children in Africa

333) Organization of Chinese American Women

334) Organization of Pan Asian American Women

335) **Ovarian Cancer National Alliance***

336) **OWL: The Voice of Midlife and Older Women***

337) Pacific Asian American Women-Bay Area Coalition

338) Pan Pacific and Southeast Asia Women's Association, USA

339) **Parents, Families, and Friends of Lesbians and Gays (PFLAG)***

340) Peace by Peace

341) **Planned Parenthood***

342) **Population Action International**

343) Professional Women of Color

344) Project Kesher

345) Project Single Moms Worldwide

346) **Pro-Life Action League***

347) Public Leadership Education Network

348) Queens Chinese Women's Association

349) Quota International

350) Rachel's Network

351) Radical Women

352) Rainbow Center

353) **Raksha**

354) **Rape, Abuse, and Incest National Network***

355) Refugee Transitions

356) Refugee Women's Alliance

357) **Refugee Women's Network**

358) **Religious Coalition for Reproductive Choice***

359) Running Start

360) Sacred Heart Women's Shelter

361) Sakhi for South Asian Women

362) Secular Woman

363) Service and Education for Women Against Abuse

364) Servicemembers Legal Defense Network

365) Sexual Minority Youth Assistance League

366) Shamakami

367) Sigma Gamma Rho Society

368) Sister to Sister

369) **SisterSong***

370) Smart Girl Politics

371) **Society for Women's Health Research***

372) **Society of Military Widows**

373) Society of Women Engineers

374) **Susan B. Anthony List***

375) **Tewa Women United***

376) The Clara Clemmons Assistance Center

377) The Gbomai Bestman Foundation

378) The Links

379) The Wage Project

380) **The Women's Center***

381) **Third Wave Foundation**

382) Tibetan Women's Association

383) Top Ladies of Distinction

384) **Traditional Values Coalition***

385) Transition Network

386) Turning Anger into Change

387) U.S. Women Connect

388) **U.S. Women's Chamber of Commerce***

389) United American Nurses - AFL-CIO

390) United Lesbians from African Heritage

391) United Methodist Church, Gender Board of Church and Society

392) **Urban Bush Women***

393) US Committee for UNIFEM

394) Utah Women's Alliance for Building Community

395) Veteran Feminists of America

396) Virginia Women in Ministry

397) Vision 20/20

398) Vistas Latinas

399) **Vital Voices**

400) Voces Feministas - KUNM

401) Voices of Conservative Women

402) Voters for Choice

403) Wages for Housework Campaign

404) Washington Area Women's Foundation

405) Welfare Warriors

406) White Buffalo Calf Woman Society

407) **White House Project**

408) **Wider Opportunities for Women***

409) WINGS Women's International News Gathering Project

410) WINTER: Women in Non-Traditional Employment Roles

411) WISH List

412) Women and AIDS Resource Network

413) **Women Construction Owners & Executives***

414) **Women Employed***

415) Women for Afghan Women

416) Women for Women International

417) **Women Impacting Public Policy***

418) Women in Community Service

419) Women in E-Commerce

420) Women in Film and Video

421) Women in Government

422) Women in Government Relations

423) Women in Harmony

424) Women in International Security

425) Women in Military Service for America Memorial Foundation

426) Women in Skilled Trades Program

427) Women Legislator's Lobby (WILL)

428) Women of Color Breast Cancer Survivors Support Project

429) **Women of Color Network**

430) Women of Color Partnership Program

431) Women of Color Resource Center

432) Women of Nations

433) Women Strike for Peace

434) Women Thrive Worldwide

435) Women Under Forty Political Action Committee

436) Women Waging Peace - Hunt Alternatives Fund
437) Women Work!
438) **WomenHeart: The National Coalition for Women with Heart Disease***
439) **Women's Action for New Directions (WAND)**
440) Women's Alliance for Peace and Human Rights in Afghanistan
441) **Women's Alliance for Theology, Ethics, and Ritual**
442) **Women's Bar Association**
443) **Women's Business Development Center***
444) Women's Campaign Forum
445) Women's Caucus for Political Science
446) Women's Center for Education and Career Advancement
447) Women's Center for Ethics in Action
448) **Women's College Coalition**
449) Women's Committee of 100
450) Women's Economic Agenda Project
451) Women's Edge Coalition
452) Women's Environment and Development Organization
453) Women's Foreign Policy Group
454) Women's Freedom Network
455) **Women's Housing and Economic Development Corp (WHEDCO)***
456) Women's Information Network
457) **Women's Institute for a Secure Retirement (WISER)***
458) Women's Institute for Freedom of the Press
459) Women's International Public Health Network
460) Women's Law Center of Maryland, Inc.
461) **Women's Law Project***
462) Women's National Democratic Club
463) Women's Opportunity Link of Delaware, Inc.
464) **Women's Ordination Conference**
465) Women's Policy Inc.
466) Women's Power Circles Ltd.
467) **Women's Research and Education Institute**
468) Women's Sports Foundation
469) Women's Voices. Women Vote.
470) Younger Women's Task Force
471) **YWCA***
472) Zeta Phi Beta Sorority

Appendix 2: Automated Text Search Terms for References to Women

UNIVERSAL TERMS FOR WOMEN
- **Women** ("women," "women's," "womens," "womens'," "woman," "woman's," "womans," "womans'")
- **Females** ("female," "females," "female's," "females'")

WOMEN IN TERMS OF AGE
- **Adolescent Girls** "adolescent girls," "adolescent girl," "adolescent girl's," "adolescent girls'")
- **College Women** ("college women," "college woman," "college women's," "college woman's," "college womens," "college womans")
- **Elderly Women** ("elderly women," "elderly woman," "elderly women's," "eldery woman's," "elderly womens," "elderly womans")
- **Girls** ("girl," "girls," "girl's," "girls'")
- **Mature Women** ("mature women," "mature woman," "mature women's," "mature woman's," "mature womens," "mature womans")
- **Menopausal Women** ("menopausal women," "menopausal woman," "menopausal women's," "menopausal woman's," "menopausal womens," "menopausal womans")
- **Older Women** ("older women," "older woman," "older women's," "older woman's," "older womens," "older womans")
- **Post Menopausal Women** ("post-menopausal women," "post-menopausal woman," "post-menopausal women's," "post-menopausal woman's," "post-menopausal womens," "post-menopausal womans," "post menopausal women," "post menopausal woman," "post menopausal women's," "post menopausal woman's," "post menopausal womens," "post menopausal womans," "postmenopausal women," "postmenopausal woman," "postmenopausal women's," "postmenopausal woman's," "postmenopausal womens," "postmenopausal womans")
- **Teen Girls** ("teen girl," "teen girls," "teen girl's," "teen girls'")
- **Teen Women** ("teen women," "teen woman," "teen women's," "teen woman's," "teen womens," "teen womans"
- **Senior Women** ("senior women," "senior woman," "senior women's," "senior woman's," "senior womens," "senior womans")
- **Women of Child Bearing Age** ("women of child bearing age," "women of child-bearing age," "woman of child bearing age," "women of child-bearing age")
- **Women of Reproductive Age** ("women of reproductive age," "woman of reproductive age")
- **Young Women** ("young women," "young woman," "young women's," "young woman's," "young womens," "young womans")

GENDER IDENTITY TERMS
- **Cisgender** ("cisgender")
- **Gender Expression** ("gender expression")
- **Gender Identity** ("gender identity," "gender identities")
- **Gender Non-Conforming** ("gender non-conforming," "gender nonconforming")
- **Intersex** ("intersex")
- **Transgender** ("transgender")
- **Transgender Men** ("transgender men," "transgender man," "transgender men's," "transgender mens," "transgender mans," "transgender man's"
- **Transgender Women** ("transgender women," "transgender woman," "transgender women's," "transgender womens," "transgender womans," "transgender woman's"
- **Transmen** ("transmen," "transmens," "transmen's," "transmens'," "transman," "transmans," "transman's," "transmans'")
- **Transwomen** ("transwomen," "transwomens," "transwomen's," "transwomens'," "transwoman," "transwomans," "transwoman's," "transwomans'")

RACE/ETHNICITY/NATIONALITY TERMS
- **African American Women** ("African American women," "African-American women," "African American woman," "African-American woman," "African American women's," "African American womens," "African-American womens," "African-American womens," "African American womans," "African-American womans")

- **Alaska Native Women** ("Alaska Native women," "Alaska-Native women," "Alaska Native woman," "Alaska-Native woman," "Alaska Native women's," "Alaska Native womens," "Alaska-Native womens," "Alaska-Native womens," "Alaska Native womans," "Alaska-Native womans," "AlaskaNative women," "AlaskaNative women's," "AlaskaNative womens'," "AlaskaNative woman," "AlaskaNative woman's," "AlaskaNative womans',")
- **Asian Women** ("Asian women," "Asian woman," "Asian women's," "Asian woman's," "Asian womens," "Asian womans")
- **Asian American Women** ("Asian American women," "Asian-American women," "Asian American woman," "Asian-American woman," "Asian American women's," "Asian American womens," "Asian-American womens," "Asian-American womens," "Asian American womans," "Asian-American womans")
- **Asian Pacific Islander Women** ("Asian-Pacific Islander women," "Asian-Pacific Islander woman," "Asian-Pacific Islander women's," "Asian-Pacific Islander woman's," "Asian-Pacific Islander womens'," "Asian-Pacific Islander womans'," "Asian Pacific Islander women," "Asian Pacific Islander woman," "Asian Pacific Islander women's," "Asian Pacific Islander woman's," "Asian Pacific Islander womens'," "Asian Pacific Islander womans'," "AsianPacific Islander women," "AsianPacific Islander woman," "AsianPacific Islander women's," "AsianPacific Islander woman's," "AsianPacific Islander womens'," "AsianPacific Islander womans'," "API women," "API woman," "API women's," "API woman's," "API womens'," "API womans'")
- **Black Women** ("black women," "black woman," "black women's," "black woman's," "black womens," "black womans")
- **DACA-Eligible Women** ("DACA women," "DACA women's," "DACA womens'," "DACA woman," "DACA woman's," "DACA womans'," "DACA-eligible women," "DACA-eligible women's," "DACA-eligible womens'," "DACA-eligible woman," "DACA-eligible woman's," "DACA-eligible womans'," "DACA eligible women," "DACA eligible women's," "DACA eligible womens'," "DACA eligible woman," "DACA eligible woman's," "DACA eligible womans'," "DACAeligible women," "DACAeligible women's," "DACAeligible, womens'," "DACAeligible woman," "DACAeligible woman's," "DACAeligible womans'," "DACA-approved women," "DACA-approved women's," "DACA-approved womens'," "DACA-approved woman," "DACA-approved woman's," "DACA-approved womans'," "DACA approved women," "DACA approved women's," "DACA approved womens'," "DACA approved woman," "DACA approved woman's," "DACA approved womans'," "DACAapproved women," "DACAapproved women's," "DACAapproved womens'," "DACAapproved woman," "DACAapproved woman's," "DACAapproved womans'," "women granted DACA status," "woman granted DACA status")
- **Foreign-Born Women** ("foreign-born women," "foreign-born woman," "foreign-born women's," "foreign-born woman's," "foreign-born womens," "foreign-born womans," "foreign born women," "foreign born woman," "foreign born women's," "foreign born woman's," "foreign born womens," "foreign born womans," "foreignborn women," "foreignborn woman," "foreignborn women's," "foreignborn woman's," "foreignborn womens," "foreignborn womans")
- **Hispanic Women** ("Hispanic women," "Hispanic woman," "Hispanic women's," "Hispanic woman's," "Hispanic womens," "Hispanic womans")
- **Immigrant Women** ("immigrant women," "immigrant woman," "immigrant women's," "immigrant woman's," "immigrant womens," "immigrant womans")
- **Latinas** ("latina," "latinas," "latina's," "latinas'")
- **Minority Women** ("minority women," "minority woman," "minority women's," "minority woman's," "minority womens," "minority womans")
- **Native American Women** ("Native American women," "Native-American women," "Native American woman," "Native-American woman," "Native American women's," "Native American womens," "Native-American womens," "Native-American womens," "Native American womans," "Native-American womans")
- **Native-Born Women** ("native-born women's," "native-born woman's," "native-born womens," "native-born womans," "native born women," "native born woman," "native born women's," "native born woman's," "native born womens," "native born womans," "nativeborn women," "nativeborn woman," "nativeborn women's," "nativeborn woman's," "nativeborn womens," "nativeborn womans")
- **Non-Citizen Women** ("non-citizen women," "non-citizen woman," "non-citizen women's," "non-citizen woman's," "non-citizen womens," "non-citizen womans," "noncitizen women," "noncitizen woman," "noncitizen women's," "noncitizen woman's," "noncitizen womens," "noncitizen

womans," "non citizen women," "non citizen woman," "non citizen women's," "non citizen woman's," "non citizen womens," "non citizen womans")

- **Refugee Women** ("refugee women," "refugee woman," "refugee women's," "refugee woman's," "refugee womens," "refugee womans")
- **US Born Women** ("US born women," "U.S. born women," "US-born women," "U.S.-born women," "US born woman," "U.S. born woman," "US-born woman," "U.S.-born wowan," "US born womens," "U.S. born womens," "US-born womens," "U.S.-born womens," "US born womans," "U.S. born womans," "US-born womans," "U.S.-born wowans")
- **Undocumented Women** ("undocumented women," "undocumented woman," "undocumented women's," "undocumented woman's," "undocumented womens," "undocumented womans,")
- **White Women** ("white women," "white woman," "white women's," "white woman's," "white womens," "white womans")
- **Women of Color** ("women of color," "woman of color," "women's of color," "woman's of color," "womens of color," "womans of color")
- **Women with Limited English Proficiency** ("women with limited English proficiency," "woman with limited English proficiency," "women with limited English-proficiency," "woman with limited English-proficiency," "women with limited english proficiency," "woman with limited english proficiency," "women with limited english-proficiency," "woman with limited english-proficiency," "women with LEP," "woman with LEP," "LEP woman," "LEP women")

RELATIONAL TERMS
- **Battered Women** ("battered women," "battered women's," "battered womens," "battered woman," "battered womans," "battered woman's")
- **Daughters** ("daughter," "daughters," "daughter's," "daughters'")
- **Divorced Women** ("divorced women," "divorced women's," "divorced womens," "divorced woman," "divorced womans," "divorced woman's")
- **Female-Headed Households** ("female headed households," "female-headed households," "femaleheaded households")
- **Girlfriends** ("girlfriend," "girlfriends," "girlfriend's," "girlfriends'")
- **Married Women** ("married women," "married women's," "married womens," "married woman," "married womans," "married woman's")
- **Mothers** ("mother," "mother's," "mothers," "mothers'," "mom," "moms")
- **Never Married Women** ("never married women," "never married women's," "never married womens," "never married woman," "never married womans," "never married woman's," "never-married women," "never-married women's," "never-married womens," "never-married woman," "never-married womans," "never-married woman's," "nevermarried women," "nevermarried women's," "nevermarried womens," "nevermarried woman," "nevermarried womans," "nevermarried woman's")
- **Pregnant Women** ("pregnant women," "pregnant women's," "pregnant womens," "pregnant woman," "pregnant womans," "pregnant woman's," "pregnant," "pregnancy," "pregnancies")
- **Separated Women** ("separated women," "separated women's," "separated womens," "separated woman," "separated womans," "separated woman's")
- **Sexually Active Women** ("sexually active women," "sexually active women's," "sexually active womens," "sexually active woman," "sexually active womans," "sexually active woman's," "sexually-active women," "sexually-active women's," "sexually-active womens," "sexually-active woman," "sexually-active womans," "sexually-active woman's," "sexuallyactive women," "sexuallyactive women's," "sexuallyactive womens," "sexuallyactive woman," "sexuallyactive womans," "sexuallyactive woman's")
- **Sexually Experienced Women** ("sexually experienced women," "sexually experienced women's," "sexually experienced womens," "sexually experienced woman," "sexually experienced womans," "sexually experienced woman's," "sexually-experienced women," "sexually-experienced women's," "sexually-experienced womens," "sexually-experienced woman," "sexually-experienced womans," "sexually-experienced woman's," "sexuallyexperienced women," "sexuallyexperienced women's," "sexuallyexperienced womens," "sexuallyexperienced woman," "sexuallyexperienced womans," "sexuallyexperienced woman's")
- **Single Women** ("single women," "single women's," "single womens," "single woman," "single womans," "single woman's")
- **Unmarried Women** ("unmarried women," "unmarried women's," "unmarried womens,"

"unmarried woman," "unmarried womans," "unmarried woman's")
- **Widows** ("widow," "widow's," "widows'," "widows")
- **Wives** ("wife," "wifes," "wife's," "wives," "wive," "wive's," "wives")

SEXUAL ORIENTATION
- **Bisexual** ("bisexual," "bisexuals," "bisexual's" "bisexuals'," "bi-sexual," "bi-sexuals," "bi-sexual's" "bi-sexuals'")
- **Gay** ("gay," "gays," "gay's," "gays'")
- **Gay Women** ("gay women," "gay woman," "gay women's," "gay woman's," "gay womens," "gay womans")
- **GLBT** ("GLBT")
- **Heterosexual** ("heterosexual," "heterosexuals" "heterosexual's," "heterosexuals'")
- **Heterosexual Women** ("heterosexual women," "heterosexual woman," "heterosexual women's," "heterosexual woman's," "heterosexual womens," "heterosexual womans")
- **Homosexual** ("homosexual," "homosexuals," "homosexual's," "homosexuals'")
- **Homosexual Women** "homosexual women," "homosexual woman," "homosexual women's," "homosexual woman's," "homosexual womens," "homosexual womans")
- **Lesbians** ("lesbian," "lesbians," "lesbian's," "lesbians'")
- **LGB** ("LGB")
- **LGBT** ("LGBT")
- **LGBTI** ("LGBTI")
- **LGBTQ** ("LGBTQ")
- **Queer** ("queer," "queers," "queer's," "queers'")
- **Sexual Orientation** ("sexual orientation")
- **Straight Women** ("straight women" "straight woman," "straight women's," "straight woman's," "straight womens," "straight womans")

SOCIOECONOMIC STATUS TERMS
- **Advantaged Women** ("advantaged women," "advantaged women's," "advantaged womens," "advantaged woman," "advantaged woman's," "advantaged womans")
- **College-Educated Women** ("college educated women," "college educated woman," "college educated women's," "college educated woman's," "college educated womens'," "college educated womans'," "college-educated women," "college-educated woman," "college-educated women's," "college-educated woman's," "college-educated womens'," "college-educated womans'," "collegeeducated women," "collegeeducated woman," "collegeeducated women's," "collegeeducated woman's," "collegeeducated womens'," "collegeeducated womans',")
- **Disadvantaged Women** ("disadvantaged women," "disadvantaged women's," "disadvantaged womens," "disadvantaged woman," "disadvantaged woman's," "disadvantaged womans")
- **Female Employees** ("female employee," "female employees," "female employee's," "female employees'")
- **High-Income Women** ("high-income women," "high-income women's," "high-income womens," "high-income woman," "high-income womans," "high-income woman's," "high income women," "high income women's," "high income womens," "high income woman," "high income womans," "high income woman's," "higher income women," "higher income women's," "higher income womens," "higher income woman," "higher income womans," "higher income woman's," "higher-income women," "higher-income women's," "higher-income womens," "higher-income woman," "higher-income womans," "higher-income woman's," "highincome women," "highincome women's," "highincome womens," "highincome woman," "highincome womans," "highincome woman's," "higherincome women," "higherincome women's," "higherincome womens," "higherincome woman," "higherincome womans," "higherincome woman's")
- **Homeless Women** ("homeless women," "homeless women's," "homeless womens," "homeless woman," "homeless woman's," "homeless womans")
- **Incarcerated Women** ("incarcerated women," "incarcerated women's," "incarcerated womens," "incarcerated woman," "incarcerated woman's," "incarcerated womans")
- **Indigent Women** ("indigent women," "indigent women's," "indigent womens," "indigent woman," "indigent woman's," "indigent womans")
- **Low-Income Women** ("low-income women," "low-income women's," "low-income womens," "low-income woman," "low-income womans," "low-income woman's," "low income women,"

"low income women's," "low income womens," "low income woman," "low income womans," "low income woman's," "lower income women," "lower income women's," "lower income womens," "lower income woman," "lower income womans," "lower income woman's," "lower-income women," "lower-income women's," "lower-income womens," "lower-income woman," "lower-income womans," "lower-income woman's")
- **Middle Class Women** ("middle-class women," "middle-class women's," "middle-class womens," "middle-class woman," "middle-class womans," "middle-class woman's," "middle class women," "middle class women's," "middle class womens," "middle class," "middle class womans," "middle class woman's")
- **Moderate Income Women** ("moderate-income women," "moderate-income women's," "moderate-income womens," "moderate-income woman," "moderate-income womans," "moderate-income woman's," "moderate income women," "moderate income women's," "moderate income womens," "moderate income woman," "moderate income womans," "moderate income woman's," "moderateincome women,""moderateincome women's," "moderateincome womens," "moderateincome woman," "moderateincome womans," "moderateincome woman's")
- **Poor Women** ("poor women," "poor women's," "poor womens," "poor woman," "poor woman's," "poor womans")
- **Rich Women** ("rich women," "rich women's," "rich womens," "rich woman," "rich woman's," "rich womans")
- **Rural Women** ("rural women," "rural women's," "rural womens," "rural woman," "rural woman's," "rural womans")
- **Uninsured Women** ("uninsured women," "uninsured women's," "uninsured womens," "uninsured woman," "uninsured woman's," "uninsured womans")
- **Upper Class Women** ("upper-class women," "upper-class women's," "upper-class womens," "upper-class woman," "upper-class womans," "upper-class woman's," "upper class women," "upper class women's," "upper class womens," "upper class," "upper class womans," "upper class woman's")
- **Urban Women** ("urban women," "urban women's," "urban womens," "urban woman," "urban woman's," "urban womans")
- **Wealthy Women** ("wealthy women," "wealthy women's," "wealthy womens," "wealthy woman," "wealthy woman's," "wealthy womans")
- **Women Business-Owners** ("women business-owner," "women business-owners," "woman business-owner," "woman business-owners," "women business owner," "women business owners," "woman business owner," "woman business owners," "women businessowner," "women businessowners," "woman businessowner," "woman businessowners")
- **Women Employees** ("women employee," "women employees," "women employee's," "women employees'," "woman employee," "woman employees," "woman employee's," "woman employees'")
- **Women Living in Poverty** ("women living in poverty," "woman living in poverty")
- **Women of Limited Means** ("women of limited means," "woman of limited means")
- **Women Workers** ("women workers," "women worker," "woman workers," "woman worker," "women worker's," "women workers'," "woman worker's," "woman workers'")
- **Women-Owned Businesses** ("women-owned business," "women-owned businesses," "women owned business," "women owned businesses," "womenowned business," "womenowned businesses")
- **Women-Owned Companies** ("women-owned company," "women-owned companies," "women owned company," "women owned companies," "womenowned companies," "womenowned companies")
- **Women-Owned Firms** ("women-owned firm," "women-owned firms," "women owned firm," "women owned firms," "womenowned firm," "womenowned firms")
- **Working Class Women** ("working-class women," "working-class women's," "working-class womens," "working-class woman," "working-class womans," "working-class woman's," "working class women," "working class women's," "working class womens," "working class," "working class womans," "working class woman's")
- **Working Women** ("working women," "working women's," "working womens," "working woman," "working woman's," "working womans")

Appendix 4: Women's Organizations' Comments on Rulemakings (2007-2013)

Rank	Organization	Comments
1	Multi-Organization Sign-On Comments	370
2	Planned Parenthood	159
3	American Nurses Association (ANA)	51
4	National Women's Law Center (NWLC)	48
5	League of Women Voters (LWV)	41
6	American Association of University Women (AAUW)	37
7	Maryland Women's Coalition for Healthcare Reform (MWCHR)	25
8	National Council of La Raza (NLCR)	21
9	Guttmacher Institute	17
9	Human Rights Campaign (HRC)	17
11	Legal Momentum (LM)	14
11	Women Impacting Public Policy (WIPP)	14
11	YWCA	14
14	National Latina Institute for Reproductive Health (NLIRH)	13
14	National Organization for Women (NOW)	13
16	National Center for Lesbian Rights (NCLR)	11
16	National Center for Transgender Equality (NCTE)	11
16	National Gay and Lesbian Task Force (NGLTF)	11
19	Center for Law and Social Policy (CLASP)	10
19	Law Students for Reproductive Justice (LSRJ)	10
21	Religious Coalition for Reproductive Choice	9
22	Catholics for Choice	8
22	National Council of Jewish Women (NCJW)	8
22	American College of Nurse-Midwives (ANCM)	8
25	American Congress of Obstetricians and Gynecologists (ACOG)	7
25	Women Construction Owners and Executives USA (WCOE)	7
27	Center for Reproductive Rights (CRR)	6
27	Concerned Women for America (CWA)	6
27	Leadership Conference on Civil Rights (LCCR)	6
31	9 to 5	5
31	Mujeres Unidas y Activas	5
31	NARAL	5
31	Women Employed (WE)	5
31	Association of Maternal and Child Health Programs	5
31	Women's Law Project	5
37	Coalition of Labor Union Women (CLUW)	3
37	Federally Employed Women (FEW)	3
37	American Civil Liberties Union (ACLU)	3
37	National Association of Women Business Owners (NAWBO)	3
37	National Breast Cancer Coalition Fund (NBCCF)	3
37	New York Asian Women's Center (NYAWC)	3
37	Pro-Life Action League (PLAL)	3
37	Society for Women's Health Research (SWHR)	3
37	Traditional Values Coalition	3
37	WomenHeart: The National Coalition for Women with Heart Disease	3
47	Black Women's Health Imperative (BWHI)	2
47	Choice USA	2
47	Institute for Women's Policy Research (IWPR)	2
47	National Family Planning and Reproductive Health Association (NFPRHA)	2
47	National Right to Life Committee (NRLC)	2
47	OWL: The Voice of Midlife and Older Women (OWL)	2
47	Parents, Families and Friends of Lesbians and Gays (PFLAG)	2
47	Wider Opportunities for Women (WOW)	2
47	Women's Business Development Center (WBDC)	2

56	Association of Reproductive Health Professionals (ARHP)	1
56	Business and Professional Women's Foundation (BPW)	1
56	Center for Women's Business Research (CWBR)	1
56	Abortion Care Network (ACN)	1
56	Eagle Forum	1
56	Equal Rights Advocates (ERA)	1
56	Fuerza Unida	1
56	Independent Women's Forum (IWF)	1
56	Junior League	1
56	Leadership Conference on Women Religious	1
56	Moms Rising	1
56	National Abortion Federation	1
56	National Association of Mothers' Centers (NAMC)	1
56	National Committee for a Human Life Amendment (NCHLA)	1
56	National Committee on Pay Equity (NCPE)	1
56	National Congress of Black Women (NCBW)	1
56	National Council of Catholic Women (NCCW)	1
56	National Research Center for Women & Families (NRCWF)	1
56	National Women's Business Council	1
56	Ovarian Cancer National Alliance	1
56	Rape, Abuse & Incest National Network (RAINN)	1
56	SisterSong	1
56	Susan B. Anthony List	1
56	Tewa Women United (TWU)	1
56	The Women's Center (TWC)	1
56	Urban Bush Women (UBW)	1
56	US Women's Chamber of Commerce	1
56	WHEDco	1
56	Women's Institute for a Secure Retirement (WISER)	1

Appendix Table 1: Count Model Fit Analysis

	Universal Women	Subsets of Women	Age Terms	Gender Identity Terms	Race, Ethnicity, Nationality Terms	Relational Terms	Sexual Orientation Terms	SES Terms
N_{zeroes}	254	387	927	931	926	689	910	820
Poisson								
BIC	11,127.799	20,521.337	-5,365.603	2,960.471	498.620	2,532.414	8,024.125	-3,637.485
AIC	17.218	25.875	2.013	9.690	7.421	9.296	14.357	3.609
Negative Binomial								
BIC	-973.004	-1,377.336	-6154.287	-5,725.074	-5,771.598	-4,088.593	-5269.110	-5,387.224
AIC	6.060	5.688	1.285	1.681	1.638	3.189	2.101	1.992
LR Test	12,107.793***	21,905.662***	791.746***	8,692.534***	6,277.207***	6,621.739***	13,300.224***	1,756.728***
Zero-Inflated Poisson								
BIC	8018.926	13,367.210	-5,940.605	-2,737.441	-3,886.806	DNC	-1,641.320	-4,842.807
AIC	14.325	19.254	1.459	4.411	3.352	DNC	5.421	2.471
Vuong	11.220***	10.000***	4.247***	6.472***	6.178***	DNC	10.077***	5.336***
Zero-Inflated Negative Binomial								
BIC	-954.309	-1,403.093	-6,159.493	-5,740.503	DNC	-4,136.400	-5,329.180	-5,417.715
AIC	6.050	5.636	1.253	1.639	DNC	3.117	2.018	1.936
Vuong	2.239***	3.973***	3.727***	4.457***	DNC	4.93***	5.993***	4.178***
LR Test	8,980.224***	14,777.292***	225.877***	3,010.051***	DNC	DNC	3,694.849***	581.898***
Selection	Zero-Inflated Negative Binomial	Zero-Inflated Negative Binomial	Zero-Inflated Negative Binomial	Zero-Inflated Negative Binomial	Negative Binomial	Zero-Inflated Negative Binomial	Zero-Inflated Negative Binomial	Zero-Inflated Negative Binomial