Lobbying Across Venues and Policies:
A Comparison of Interest Group Activities at the State and Federal Levels¹

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Abstract

We study interest groups’ decisions about the policy-making institution in which to press for policy change. Most research about lobbying activities focuses within a single institution (the legislature, the bureaucracy), but groups and lobbyists generally can choose from among multiple venues. Further, some important questions about organized interests and the policy process require studying lobbying behavior across several venues. Here we study lobbying behavior in both the legislative and administrative venues, using data at the Federal level filed under the Lobbying Disclosure Act and from lobbying reports in the state of Minnesota; each data set has unique features that exploit. We address two questions using these data. First, how do groups allocate their lobbying efforts across venues? We find that the vast majority of groups lobby the legislature, but that a large proportion of groups also lobby the bureaucracy. Second, we study the distribution of lobbying across policy areas to determine whether the locus of lobbying activity is in different venues for different policy areas. Our results strongly reject this claim: the level of interest group activity in one venue is highly related to the level in the other venue.
Since the creation of administrative agencies with broad, standing discretion, the authority to initiate policy change in the U.S. has not been confined to any single institution or branch of government. Legislatures certainly maintain their constitutionally-granted right to initiate change. But executive branch or independent agencies can often, pursuant to an authorizing statute, independently initiate policy changes on the same issue. At some level the exercise of such authority must pass muster with the constitutional branches (the massive but ill-fated workplace ergonomics regulation program, issued by the U.S. Department of Labor in the last days of the Clinton Administration, comes to mind). But the standing discretionary authority of agencies changes the status quo from rejection to acceptance of an agency’s action, and time-constrained legislators face transaction and attention costs as they attempt to learn about, and possibly change, the policy decisions of bureaucrats. This creates a measure of autonomy\(^1\) in administrative agencies, and makes the policy process as a whole more of a “parallel system” (Bendor 1985).

This presents seekers of policy change with a choice: which policy-making venue is the best one in which to press a case for change? Assuming their activities are consequential, the way in which organized interests sort themselves across venues is crucial for any assessment of the policy process as a whole. In particular, the hopeful argument that formal requirements of openness and participation in bureaucratic policy-making can overcome biases in the pressure group system basically requires that some groups (ideally those disadvantaged in the legislature) sort disproportionately into administrative lobbying. Studying such questions of venue choice requires information that connects the behavior of lobbyists and the issues they target in multiple policy-making institutions.

Yet almost all existing evidence on lobbying activities focuses within a single venue — the legislature, in a huge literature (see Baumgartner and Leech 1998), or administrative agencies, in a growing literature (especially related to notice-and-comment rulemaking; see Golden 1998, Furlong 1997, Furlong and Kerwin 2005, and Yackee and Yackee 2006). For our purposes it is necessary to link the behavior of organized interests across policy-making venues. Doing this allows us to compare interest group lobbying across venues and also to ascertain how representation varies across multiple venues.

Because of the linkage across venues in our data, our findings advance the growing literature

\(^1\)In a principal-agent context with asymmetric information, some minimal autonomy for the agent is generally unavoidable. It is more commonly known as “agency loss.”
on administrative lobbying. Several important recent findings (Golden 1998 and Yackee and Yackee 2006) have noted that business interests engage in more administrative lobbying than other interests. These scholars also showed that agency decisions (in the form of final rules) respond favorably to a unified front among interests with a predominance of lobbying effort. Yet, these scholars also acknowledged that, in the absence of a baseline, it is impossible to demonstrate that administrative lobbying opportunities make the policy process more biased to these interests than it would be without administrative participation. It is possible that, absent formal requirements for equal footing of participants in the bureaucracy, favored interests would be even more predominant.

Linking lobbyist behavior across venues can help to shed some light on this. If participation in administrative policy-making alleviates bias, it must be the case that some groups sort themselves disproportionately into the administrative venue. The idea here is that some groups may be unable to succeed in the legislature, but assurance of formally equal access to the bureaucratic venue (e.g., through notice-and-comment procedures) can given them a chance to be heard at that stage of the policy process. By studying venue choice and the simultaneous targeting of issues in different venues, we can assess the contribution of administrative lobbying to overcoming any biases and inequities in the legislative pressure group system. In essence, lobbying in the legislature is the baseline in this design, and we assess whether administrative lobbying changes the access and issue attention patterns of the policy process as a whole, relative to that baseline.

For this paper we use lobbying data from both the Federal level and a new data set from the state of Minnesota. Both data sets contain information about venue choice by interest groups; in addition, they both contain information about these choices for multiple policy areas in which groups express interest. Thus we can study venue choice at the group-policy level to obtain a more detailed sense of how venues and representation interact. Further, we can also aggregate these data to study the distribution of activity in multiple venues at the policy level. The data sets are comparable in a number of ways, but we also exploit their unique features. For example, the Minnesota data have information on the number of lobbyists hired by and lobbying disbursements made by each group for each policy area of interest and in each venue. While the Federal data do not have this detailed information at the policy-venue level, it does include information on the category of groups, which allows us to study the balance of representation across venues.

The clearest overall finding in this data is that the groups and policy issues that predominate in
one venue also predominate in the other. In terms of policy areas, this is especially true when measured by total activity on that policy issue in each venue. In terms of groups, the big spenders in the legislature are also the big spenders in administrative agencies. At the group-policy level the story is similar, though somewhat more complicated. While the level of a group’s activity across venues in a given policy area is highly related, the presence of groups across venues is less related. That is, while most groups lobby the legislature only about half of them also lobby the administrative branch and very few groups lobbying only the bureaucracy. Thus it seems that groups that do not lobby much are less likely to be represented in the administrative venue, but those that lobby a lot are generally represented in both.

Yet this result is paired with the finding that in Washington, D.C., the distribution of groups across venues is quite similar: the common story of business dominance prevails in and across venues. Therefore, to the extent that the pressure group system in the legislature reflects biases and inequities in mobilization, attention, and access, participation in the administrative arena does not alleviate them. Participatory opportunities in the bureaucracy appear primarily to be an opportunity for the “rich to get richer.” These results present reason to doubt that formal participation and openness requirements in administrative agencies can alleviate the democratic pathologies of legislative lobbying.

1 Data on Lobbying, Venues, Policies and Groups

To study variation in lobbying activity across venues requires detailed information that links organizations’ lobbying efforts to specific issues and venues. Data gathered at the Federal level through the 1995 Lobbying Disclosure Act provides some useful information whether groups target different venues across different policies, but it has little information about the level of interest or lobbying across those venues. We exploit these data as much as possible, but desire more detailed information on lobbying effort across venues.

One promising source of such information comes from activity and reports in the state of Minnesota. Lobbying regulations in Minnesota require groups to report a variety of information, much of which is publicly available on the state’s Campaign Finance Regulation web site.2 These reports...

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2 The URL for the site is http://www.cfboard.state.mn.us/index.htm.
require lobbying principal organizations and lobbyists to report their lobbying activity on a semi-
annual basis and include information on which policy areas lobbyists are active on and in which
venues they lobby, including the legislature, the administration or metropolitan government units.
Groups are also required to report lobbying disbursements across venues, though not at the policy-
venue level.

In the rest of this section we discuss these two data sources in detail. Since the Federal data have
been discussed and analyzed in previous studies (i.e., Baumgartner and Leech 2001), we focus more
on discussing the Minnesota data, including reviewing lobbying reporting there and the different
data sources that we combine to obtain information about groups lobbyists and expenditures across
policy areas.

1.1 Lobbying Data in Minnesota

Minnesota requires both groups and lobbyists to register with the state if they exceed a minimum
amount of lobbying activity. Lobbying is defined under the Handbook for Lobbyists and Lobbyist
Principals for each of three venues.\(^3\) Legislative lobbying constitutes efforts to influence action of
either legislative house on a variety of actions, including bills, resolutions, nominations, or reports.
Administrative lobbying includes attempts to influence rulemaking procedures or rule application
for rate setting and power-related issues. Metropolitan lobbying involves attempts to influence the
official actions of a Metropolitan governmental unit.

A lobbyist is defined in three ways as well. First, it includes individuals who receive compensa-
tion of at least $3,000 from all sources in a given year for engaging in the lobbying activities just
described. Second, it includes individuals who spend at least $250 of their money engaging in lob-
bying activities (travel costs are exempt). Finally, any local official or government employee who
spend at least 50 hours in a month lobbying the government, excluding that individual’s political
subdivision is a lobbyist. Groups that lobby are required to register if they spend more than $500
on a lobbyist in a calendar year or if they spend in excess of $50,000 on their own lobbying activi-
ties. Lobbyists and principals are required to register within three days of engaging in any lobbying
activities.

\(^3\)The handbook is published by the Minnesota Campaign Finance and Public Disclosure Board and is available for
Information about groups and lobbyists is not available in a single repository, so we must combine information from two sources: one on groups and expenditures and one on lobbyists. Information on lobbying across issues is available from the lobbyist data. Lobbyists in Minnesota are required to keep records about the general subjects on which they lobby or expect to lobby and which venue they expect to target. This information is summarized in a single list that includes for each lobbyist: the name of each organization represented, a list of issues to be lobbied on for each organization and, for each issue, a list of the venues to be lobbied.\(^4\) Excluding 442 cases of lobbyists that failed to report an issue for a given organization, we have a total of 6826 lobbyist-issue-organization and 3975 issue-organization observations from 1092 organizations, for an average of 5.85 lobbyist-issues per organization and 3.64 issues per organization, implying an average of about 1.6 lobbyists per organization per issue.

Lobbyists are not required to file reports in preset policy areas, but the state provides a list of 95 issues on which to report activity.\(^5\) While there are a total of 669 alphanumerically unique issues reported, the information is not sufficiently detailed to study lobbying across issues. Most reported issues are taken directly from the government’s list; many of the exceptions are merely minor variations or misspelled version of the 95 issues. We therefore rely on the list of 95 policies suggested by the state and assign each of the 669 issues to one of the 95 policies. We were able to code 91% of the original 669 issues in this way. We refer to these categories as policy areas rather than as issues in order to distinguish between Baumgartner and Leech’s usage.\(^6\)

We use the information so gathered from the 2004 reports to calculate lobbying activity at the group-policy level. For each group, we determine the number of lobbyists it employed that mention each policy area. We also calculate the number of those lobbyists that indicate legislative, administrative and metropolitan lobbying. While we would prefer to have a more detailed measure of group activity across venues, such as lobbying effort or expenditures, counting lobbyists employed by venue should provide some information on relative attention to venues. We can also our measures of group activity across policy areas to study the distribution of total activity across policies by adding up the activity of all groups in a given policy area.

\(^4\)The URL for this list is http://www.cfboard.state.mn.us/lobby/lobbysub.html. Versions of this list are not available on an annual basis, just the current up-to-date listing. We downloaded this list on September 10, 2004.  
\(^5\)The URL for this list is http://www.cfboard.state.mn.us/lobby/LSUBJECTDESCRIPTIONS.htm.  
\(^6\)We are currently in the process of having a second coder independently go through these data and will correct any discrepancies and fill in the uncoded issues as possible in the near future.
Data on group expenditures by venue are available from a separate source. While organizations only have to report total lobbying expenditures, with no information on policies or venues, they are required to furnish detailed information on disbursements (which exclude lobbyists’ salaries), and are reported by their lobbyists in their detailed lobbying reports. Groups represented by multiple lobbyists have a single designated lobbyist who fills out the report on behalf of all lobbyists employed by the organization, so we have information at the organizational level, but not at the organization-lobbyist level. The disbursements reported include those made by the principal as well as those made by lobbyists on the principal’s behalf.

During this period, the state reports filings by 1210 lobbyists, representing 1220 associations and individuals. Lobbying disbursements totaled $11,936,711, with 72% of associations and individuals represented reporting positive disbursements. Information on total principal expenditures is available, but only in the aggregate and not by venue. Aggregate spending figures suggest that about 25% of principal expenditures constitute the lobbying disbursements data we utilize here.

While data on disbursements are available for each venue, they are not disaggregated by policy area. To obtain an estimate of lobbying expenditures across issues, we assume that total expenditures for a group in each venue are distributed equally among lobbyists on that venue. Thus if a group has twice as many lobbyists registered on one issue as on another in the legislature, we assume that they spend twice as much on legislative lobbying on that issue. Total lobbying expenditures per policy is then calculated by summing up the expenditures in each venue for that policy. Clearly this is a relatively strong assumption to make about the ways that groups devote lobbying expenditures across policies. Different issues may receive greater or lesser expenditures independent of the number of lobbyists devoted to that policy. Further, we only know the number of lobbyists per issue, not the amount of time or effort they devote to each policy, which is likely to vary widely. Our measure is likely to capture reasonable variation in expenditures across policies since we expect that policies with more lobbyists hired are likely to be those that receive greater

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7 Disbursements are reported in specific categories as well: “preparing and distributing lobbying materials; media advertising; telephone and all other communication services; postage and distribution costs associated with lobbying activities; fees, allowances, public relations campaigns including consulting and other expenses related with those services; entertainment; food and beverages; travel and lodging; salary and administrative costs of support staff attributable to lobbying; and all other disbursements including general administration and overhead and any other lobbyist disbursements not reported in other categories; gifts or benefits paid or given to local or public officials; and other sources of funds of more than $500 in a calendar year given for purposes of lobbying, including fees or salary aid to a lobbyist as compensation” (Handbook for Lobbyists and Lobbyist Principals).
expenditures on average.

Constructing this measure does reveal some inconsistencies in our data. Specifically, there are some groups that report spending money on legislative lobbying but that do not have a lobbyist that indicates the legislature as one of his venues. Because there are no legislative lobbyists listed for such a group, our measure of lobbying expenditures for each issue for that group is zero, ignoring the positive amount reported. The errors are not too severe, however, as we account for 91% of lobbying expenditures when comparing the total of our estimates across issues to the reported total lobbying expenditures. We plan to consider alternate approaches to estimating expenditures across issues in the future. At the present time, we do not rely too heavily on the expenditures data.

1.2 Lobbying Data at the Federal Level

To study lobbying across venues and policy areas at the Federal level, we utilize data filed under the 1995 Lobby Disclosure Act (LDA). The LDA requires groups to file semi-annual reports listing their total lobbying expenditures if they exceed a minimum threshold of lobbying activity (spending at least $21,500 or or employing an individual who devotes at least 20% of their time to lobbying activities during a six-month period), though the definition of lobbying excludes most forms of grassroots lobbying. In particular, we rely on Baumgartner and Leech’s (2001) data on 1996 filings, which they have made available online. These data include information on total lobbying expenditures and lobbyists employed across issues. In particular, we focus on the incidence of legislative and administrative lobbying by groups as well as group activity across policy areas.

Whereas Baumgartner and Leech (2001) were interested in the number of groups involved in a sample of 137 issues (out of 49,518 total issues mentioned in the reports), we focus on group activity in and across policy areas in order to maintain comparability to the Minnesota data. Because the LDA requires groups to file separate reports for each of seventy-four different issue areas, it is relatively straightforward to calculate lobbying activity at the group-policy level. Further, we can study lobbying across venues using the information in these reports: groups are asked to list which branch of government they contacted for each policy area, including the House, Senate, White House and the number of agencies. To compare lobbying activity across venues, we determine whether a group

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8The URL is http://lobby.la.psu.edu/related.html.
9See also Baumgartner and Leech (bl-lda) and Furlong (1999) for more information on the strengths and weaknesses of the LDA data.
mentions either the House or Senate for each policy and whether they mention an agency.

Because groups may file multiple reports in each policy area, we measure activity at the group-policy level by aggregating across reports. Thus a group’s activity level on a given policy area is measured by the number of reports it files in that policy area. Further, its level of administrative lobbying is measured by the number of reports in a policy area that mention at least one agency. We take this approach in order to get a measure of activity within a policy area and because the other information in each report is not detailed by venue: a single report may indicate multiple lobbyists and venues, but does not report how those lobbyists’ efforts are allocated across venues. Further, while groups report total lobbying expenditures, those are broken down neither by issue nor by venue.

In order to determine lobbying activity across policies and venues, we merely aggregate the previously constructed data at group-policy level by adding up the activity of all groups within a policy area. This gives us measures of the number of group reports in each policy area as well as on the number of reports that mention the administrative or legislative branch.

One useful feature of the Federal data is groups are coded into eleven categories based on the organization’s type or the substantive interest they represent. Importantly, these categories include businesses and corporations, professional associations, trade associations, citizen groups, and labor unions. This categorization allow us to study the distribution of organizations across venues.

2 Aggregate Group Lobbying Activity Across Venues

In this section we discuss the distribution of group activity across venues. This allows us first to address the overall distribution of interest group lobbying activity across venues and second to address how the relative representation of groups varies across venues. Table 1 provides the aggregate distribution of group activity in both Minnesota and at the Federal level for each of our different measures.

Table 1 Here.

The first notable finding in this table is that while the legislature receives the greatest amount of attention for all measures and for both sets of reports, there is a substantial amount of attention devoted to other venues. Consider first the distribution of groups across venues. This represents
a count of the number of organizations that mention each venue at least once. At both levels of government, the most frequently mentioned venue is the legislature. Further, at both the levels, about 50% more groups mention the legislature than mention the administrative branch. In Minnesota, we see that there are also a considerable number of groups interested in lobbying at the metropolitan level of government — in fact, there are more groups mentioning this venue than mention the administrative venue. Of these groups, about 260 groups only mention metropolitan lobbying. The average group in Minnesota mentions 2 venues, though the number drops to 1.6 if we only consider legislative and administrative lobbying and ignore groups that mention neither. At the Federal level, the average group also mentions 1.6 venues (among the two we consider).

Our other measures of lobbying activity result in ever-increasing attention to the legislative branch. When we consider the attention to different venues at the group-issue level, the proportion devoted to the legislature relative to the administrative branch rises to 65% at both levels; at the group-issue-lobbyist level in Minnesota the figure is 66% and at the Federal level the figure at the group-issue-report level is 67%. Finally, we can use the Minnesota lobbying disbursements data to measure spending across venues, which may provide a measure related more to effort than to attention (though recall that these figures do not include lobbyists’ salaries). Here, the difference is even greater, with 88% of expenditures devoted to the legislative branch and only 8% and 4% devoted to the administrative and metropolitan venues, respectively.

These numbers indicate that groups are not focused solely on lobbying the legislature and that a considerable amount of group attention is devoted to other venues. Yet the Minnesota data also reveal that a very large percent of lobbying disbursements are allocated to the legislative arena. These differences may result from the uniqueness of lobbying expenditures which, unlike lobbyists, can not be reported as acting in multiple venues and the fact that expenditures are measured with much more detail. It is too soon to conclude that the vast majority of lobbying activity takes place in the legislature, however. We say this because the expenditures data include disbursements, but not lobbyists’ salaries, and the latter constitute 75% of total group expenditures. To the extent that administrative or legislative lobbying are more or less intensive in terms of lobbyists time as opposed to lobbying activities, the relative lobbying effort across venues would change if we had measures of both. Expenditures also give a better idea of how much activity a group devoted to each of the three venues, as they are measured on a more precise scale.
3 Representation of Groups Across Venues

In this section we compare the attention and resources devoted across venues by individual groups. This allows us to study whether group activity in different venues leads to different patterns of representation. That is, are groups that are represented in each venue the same, or are they different? This is an important question for (at least) two reasons. First, one of the goals set forth by the legislature for the bureaucracy is to favor openness and broad participation. Second, most of our understanding of representation among organized interests focuses almost exclusively on legislative lobbying and the few studies that do focus on representation in the bureaucracy do not have comparable measures of representation in the legislative branch. Of course, one should keep in mind that almost all these measures, including ours, focus only on the presence or effort of groups and not on whether those groups’ views are incorporated into policy outcomes.

Using our data on groups’ attention to multiple venues allows us to determine the extent to which groups involved in one venue on a given policy area are also the groups involved in other venues. In this section we focus solely on groups that lobby either the legislative or administrative branch. We attempt to answer this question in three ways. First, we compare the incidence of legislative and administrative lobbying by groups in order to determine whether groups specialize in one venue. We also report correlations of lobbying attention across venues to see if groups specialize in one venue or focus similarly on both. Second, we compare the amount of attention devoted to legislative lobbying based on whether a group lobbies in the bureaucracy. This offers a simple comparison of whether groups that lobby in the administrative branch are different in their legislative behavior. Finally, we use information in the Federal lobbying data to compare the distribution of organization types in the different venues.

Our first measures of venue attention examines the distribution of group activities across venues. Specifically, we tabulate interest in the legislative and administrative venues at the group-policy level. Thus for each policy area that a group is interested in, we record whether a group indicates lobbying the legislature and the administration and then tabulate the results. These tabulations are presented in Table 2. Because the Minnesota data include many groups who are interested only in metropolitan lobbying, we exclude all groups that indicate lobbying at the metropolitan level and do not lobby at either the legislative or administrative level. This table makes it clear that there
are few groups that specialize in administrative lobbying: over 95% of the groups at both levels of
government lobby the legislature. The majority of groups do indicate interest in the administrative
branch, however. This creates a strong relationship between lobbying the administrative branch
and lobbying the legislature: the conditional probability of the latter given the former is over 90%
for both cases. The opposite relationship does not hold, however: groups that lobby the legislature
are evenly split between administrative lobbying and no administrative lobbying. Because so many
groups lobby in the legislature, of course, these findings reflect the overall distribution of lobbying
attention (though one can reject the null hypothesis of independence at the .05 level with a Pearson’s
\( \chi^2 \) statistic).

[Table 2 Here.]

Table 3 explores the Minnesota data in more detail, by adding a breakdown of lobbying attention
by interest in the metropolitan level. Note the large number of group-policy cases that fall into the
metropolitan only cell — 1281, or almost one third of the cases. Further, note that 56% of the group-
policies that involve metropolitan lobbying and 32% of all cases do not involve either legislative or
administrative lobbying. This result suggests a fairly high degree of specialization in metropolitan
lobbying, but it seems to be partly a consequence of the kinds of issues that are dealt with at different
levels of government rather than a characteristic or tendency on the part of the groups interested
in those issues. If we tabulate venue interest at the group level (not shown), we find that a smaller
30% of groups with any interest in metropolitan lobbying focus only on that venue and 20% of all
groups express interest only in the metropolitan venue. On the other hand, metropolitan lobbying
is something that most groups (57%) engage in on at least some issues, suggesting that it is not an
extremely specialized venue.

[Table 3 Here.]

Comparing the correlations between these measures of any interest to those for the level of
interest provides mixed evidence about whether groups specialize by venue: measured by a group’s
presence across venues, there is small but negative correlation; measured by the amount of attention
the correlation is positive and large. At the level of groups, the correlation between whether a group
lobbies the legislature and whether it lobbies the administrative branch is -0.08 in Minnesota and -
0.07 at the Federal level. The correlations between the number of lobbyists or reports in each venue
are 0.90 and 0.75, respectively. Legislative and administrative expenditures in Minnesota have a
correlation of 0.11. At the level of group-issues, the correlation between any attention in the two venues is -0.09 in Minnesota (here we again exclude groups that just lobby the metropolitan level of government) and -0.22 at the Federal level. In Minnesota the correlation between the number of lobbyists devoted to each venue is 0.69; at the Federal level the number of reports per group-issue across venues has a correlation of 0.42.

These numbers suggest that there is a difference between the groups that get involved in each venue, but that the amount of attention devoted to the different venues is positively correlated. This is likely driven by the fact that groups that lobby a lot in one venue also lobby a lot in the other venue, but that groups that lobby a little in one venue may not lobby in the other venue.

In order to provide a more detailed perspective on lobbying activities across venues, we compare levels of legislative lobbying for groups based on the level of administrative lobbying. Our first look at this compares the distribution of legislative lobbying activity based on whether groups are involved in the administrative branch. Because we are most interested in representation on specific issues, we perform this analysis at the group-issue level. Table 4 reports the joint distribution of the number of reports or lobbyists for the legislative and whether there was at least one in the administrative branch on that issue. The results are similar at both levels of government: groups that have no administrative lobbying are more likely to have only one lobbyist or file on report in the legislature and groups that do lobby in the administrative branch are more likely to have all numbers of lobbyists/reports greater than one.

[Table 4 Here.]

A second perspective on this question is provided by Figure 1, which graphs the conditional distribution of legislative lobbying for each level of administrative lobbying. The circles marking each combination of administrative and legislative lobbying are proportional to the number of legislative lobbyists given a specific number of administrative lobbyists. (Results at the upper ends of the ranges are combined both for presentation purposes and to have a reasonable number of observations for each level of administrative lobbying.) It is clear from this figure that the greatest proportion of groups devote the same amount of attention to each venue, as the largest circles are on the “45 degree” line. Second, it is also clear that most groups have more legislative than administrative lobbyists. Finally, it also reveals that one feature of the Minnesota lobbying system is that almost no lobbyists list just the administrative branch and not the legislative branch, as evidenced
While the data analyzed so far give us some sense that representation in the bureaucracy mirrors representation in the legislative branch — at least when measured by lobbyists or reports — it tells us little about the identity of those groups. To answer this question, we rely exclusively on the Federal data, which partition groups into ten categories. Combining the professional lobbying firms category with the business and corporation category results in nine final categories. To compare representation across venues, we calculate the distribution of organizational types within each venue. Again, we calculate these numbers at the group-policy level and at the group level. Because groups can report lobbying in either or both venues, we examine the distribution of organizations in three categories: those that lobby just the administrative or legislative venues and those that lobby both.

The results are presented in Table 5. Overall, the distribution of organizations across venues appears to be fairly similar. There are some differences, however. First, businesses and corporations are more likely to specialize by lobbying in only one venue. Second, citizen groups, hospitals, and universities all tend to specialize in legislative lobbying relative to other groups. Most other groups are more likely to focus on both venues.

These results should be tempered by three facts. First, the number of groups lobbying in just the administrative branch is small — less than 5% for both measures. Thus representation in this branch is not measured as accurately as in the other branches. Second, the differences are still relatively small. The overall pattern of representation is fairly consistent across the three venues, indicating the well-known pro-business bias in representation. Third, making inferences about how the existence of multiple venues changes representation involves a counterfactual about how groups’ lobbying would change if the available venues were different. Groups registered in just one venue might, if that option were closed off, move their efforts to the other.
4 Activity Across Venues by Policy Area

In this section we move from comparisons across groups to comparisons across policies. Here the question is whether aggregate activity in each venue is the same for a given policy area. This helps us address the issue of whether different venues dominate across policy areas. If this is the case, then groups are favored if they are most adept in a dominant venue.

To address this issue, we study the distribution of activity in each venue by aggregating over all groups indicating activity in that issue area. At the Federal level we have information on total groups and group-reports in each of the 74 policy areas for both the legislature and the administrative branch. In Minnesota, we have information on total groups and group-lobbyists for each of the ninety-five policy areas listed by the state government.

Our results provide strong evidence that policy areas that are “large” in the legislature are also large in the administrative branch. That is, the largest policies in the legislature are generally the largest policies in the administrative branch. In fact, the correlation between the two measures is 0.95 in Minnesota and 0.98 in Washington, D.C. Clearly, then, there appears to be little substitution among venues in terms of specialization or shifting of lobbying.

A comparison between group effort across policy areas in the two venues is presented in Figure 2. Because the scale of lobbying is much greater in Washington, D.C., we use two different sets of axes. Further, the data are presented on a log-log scale in order to better separate policy areas with lower levels of lobbying, of which there are many relative to a few high-attention outliers.

As suggested by the large correlations between the variables, the data cluster around the 45 degree line, though every single policy area lies slightly above it. In Minnesota, the average ratio of legislative to administrative groups is 1.89; at the Federal level it is 2.24. The marginal increases in legislative groups for every additional administrative group — obtained from a simple regression of the former on the latter — are 1.73 and 1.84.

These results are very similar if we analyze the number of lobbyists on each in Minnesota, but not if we compare lobbying expenditures. Figure 3 contains these two plots for policies in Minnesota. The correlation between the number of lobbyists per group per issue is 0.97, but the corre-
lation for expenditures is 0.06. For expenditures the relationship is clearly positive, but appears to be curvilinear — increasing at a decreasing rate.\textsuperscript{10} Recall that our measure of lobbying disbursements across policies is imputed to be proportional to the number of lobbyists working for each group on each issue. The fact that the results are so different for the two measures suggests that our imputation does not merely mimic the distribution of lobbyists.\textsuperscript{11}

5 Comparing the Size of Policy Areas

Our final task is to compare the distribution of activity across policy areas. Baumgartner and Leech (2001) provides one of the first explorations of this issue and finds that there are a few policy areas with a lot of group activity, but that the vast majority of issues have very few groups involved. Here, we extend this approach in two ways. First, we perform a similar analysis in Minnesota to provide a comparison between the distribution of activity at the state and Federal levels. Second, we also examine the distribution of activity across venues to study whether activity is more or less skewed in the administrative branch relative to the legislature.

Because we do not have data on individual issues in Minnesota, we modify Baumgartner and Leech’s approach by comparing interest group activity across policy areas rather than across issues. This facilitates comparison between the Federal data and the Minnesota data. Note that the total number of groups and issues (as well as the substantive content of those issues) are different for these two environments. To compare the two then, we take the following steps. First, we calculate the proportion of all group activity on a given policy area. Second, for both Minnesota and Washington, D.C., we order policy areas by their associated proportions of activity. To put the two distributions on the same scale, we then calculate the percentiles of each policy area. Thus the median policies measured by group activity will be directly compared, as will the seventy-fifth percentile policy areas, etc.\textsuperscript{12}

Before comparing the results, we first describe the distribution of lobbying activity in Minnesota.

\textsuperscript{10}Note that because the results are displayed on a log scale, we lose fifteen observations with no administrative expenditures. Legislative lobbying on these issues varies greatly over the entire range, so ignoring these policies does not affect the interpretation from our graph.

\textsuperscript{11}Some of the outliers for expenditures include the environment and gambling, which have large legislative expenditures relative to administrative, and telecommunications with large administrative relative to legislative expenditures.

\textsuperscript{12}Matching policy codes across the two data sets is certainly possible for some subset of issues (some are unique to each level of government), but the process is less straightforward for others. Ultimately, we hope to recode each of the Minnesota lobbying reports using the seventy-four Federal policy codes.
The top five categories account for 20% of all activity, while it takes the fifty smallest categories to obtain the same percentage. The median issue has 0.7% of groups (23 groups) and 0.7% of lobbyists (44 lobbyists). There are sixteen issues with fewer than ten groups and four issues with more than one hundred groups. Comparing the amount of activity in the top for categories (17.5% of groups) to Baumgartner and Leech’s (2001) data (34% of groups) indicates a lower concentration of lobbying activity in the top categories based on our coding of the Minnesota data.13

[Figure 4 Here.]

Figure 4 plots the densities of group activity irrespective of venue in order to directly compare the Federal data to those from Minnesota. The distributions are extremely similar, particularly given that they are from different levels of government in different years and based on different policy area codings. Certainly the Federal data exhibit greater densities for large issues and slightly lower densities for smaller policy areas, but the overall result is one of great similarity. Neither Kolmogorov-Smirnov nor Kruskal-Wallis tests indicate we should reject the null hypothesis that these distributions are the same, even at weak levels of statistical significance.

[Figure 5 Here.]

In order to compare the distribution of lobbying across venues, we construct similar graphs using only groups that mention the legislature and only groups that mention the administrative branch. These comparisons are presented in Figure 5. As with total activity, it is clear that there is little difference in the distribution of group activity across policy areas either between Minnesota and Washington, D.C., or between the administrative and legislative venues. Again, statistical tests fail to reject the null hypothesis that the densities are identical.

6 Discussion: Participation in Administrative Policy-making

A consistent pattern in the evidence above is of an interest group ecology that, collectively, attempts to direct administrative agencies to much the same set of groups and issues as the legislature.14 This has several important implications for the role of the bureaucracy in the policy process.

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13In Minnesota, the data are even more skewed if we compare the amount of lobbying expenditures across policy areas. The top five categories account for 34% of all lobbying expenditures. The median policy area accounts for only 0.5% of total activity with the bottom half of the cases accounting for 9% of all expenditures.
14We say “attempts” because, like much lobbying data, this evidence cannot address the effects of these lobbying efforts on policy. It is not an attempt to treat the population of groups as a unitary actor.
A first, basic implication is suggested by a strategic calculus behind these venue choice decisions. It would appear that groups do not feel content to lobby the legislature and let it direct the bureaucracy in turn. Rather, when groups are active in lobbying they spread their efforts throughout the policy process. They consistently use more resources on legislative than administrative lobbying, but in general, the more they use on one, the more they use on the other. This is difficult to rationalize unless the bureaucratic agencies can make some decisions, independent of the legislature (in the short run at the least), that matter to the groups.

Furthermore and more provocatively, to the extent that activities and expenditures of organized interests are consequential, the administrative policy process largely reinforces the advantages bestowed onto particular groups and issues in the legislature. Or, turning this around, it is not the case that administrative lobbying broadens the attention of the policy process in general — legislature and bureaucracy combined — to issues and interests that lobbyists cannot get on the legislature’s agenda. That would require “small” interests and issues in the legislature to be relatively “larger” in the bureaucracy. Or it would result in a different distribution of organization types in the two venues. Across several measures, that is not the case.

There are several possible explanations for this pattern of activity. First is a basic logic of collective action (Olson 1965). Administrative lobbying may be subject to essentially the same collective action problems as legislative lobbying. To that extent, assuming the bureaucracy is capable of making some decisions of value, it makes sense that groups very active in the legislature would also be relatively active in the bureaucracy. And to the extent that groups are concerned with a specific set of policy issues, the relationship between legislative and administrative activity would carry over to policies as well. Second, this pattern may reflect bureaucratic responsiveness to legislative preferences. Groups have the option not to lobby very much or at all, and if bureaucratic policy preferences track legislative preferences, groups likely to get a favorable hearing for their concerns will want to “make hay while the sun shines” in both venues.\textsuperscript{15} Again, this assumes that the bureaucracy has some policy decisions to make that the group actually cares about.

In any case, this pattern sheds light on the effect of participation opportunities in bureaucratic

\textsuperscript{15}For a formal examination of the importance of group non-participation in venue choice, see Boehmke, Gailmard, and Patty 2006. That argument shows that the possibility of non-participation can actually make a legislature want to weaken the responsiveness of bureaucratic policy preferences to legislative preferences, so that groups are induced to participate and share their information.
policy-making, relative to the legislative baseline. The bureaucratic venue presents another opportunity for the active, high-spending interests that predominate in legislative lobbying to be heard. The lobbying patterns it is exposed to do not directly broaden the set of groups or policies privileged in other parts of the policy process. Of course, only some of our data directly address the question of bias in the legislative interest group population. Given these biases, the rest of the data suggest that they are propagated in the administrative interest group population as well. Since the “upper class accent” of the chorus of organized interests in the legislature is well-known, we can conclude that the same accent exists in administrative lobbying as well.

7 Conclusion

We have assembled a new dataset that takes advantage of reporting requirements for lobbyists in the state of Minnesota, and breaks lobbying effort and expenditure into different policy areas and across policy-making venues. We compare these data to those gathered at the Federal level under the Lobbying Disclosure Act of 1995. The data show that the relative amount of attention devoted to policy areas by groups is quite similar across venues, particularly when measured by levels of activity rather than mere presence. These relationships are even strong when measured at the level of policies: the number of groups active in the legislative is highly correlated with the number of groups active in the bureaucracy. The relationship for lobbying expenditures in Minnesota across policies is clearly apparent but nonlinear (roughly quadratic on the log-log scale): policies with high spending in the administrative venue also have high spending in the legislative venue, but the converse is not true. In addition, groups that lobby heavily in the legislature, as measured by their expenditures, also lobby heavily in the administrative venue. In all, the results show that existing participatory possibilities in administrative lobbying are sufficient to “level the playing field” for neither groups nor policy issues, relative to the legislative branch.

There are, of course, a number of forms of participation that are missing from these data. The data do not include groups that engage solely in outside lobbying; both exclude groups that fall below the reporting thresholds. Further, they both exclude additional forms of participation in the

\footnote{Actually this assessment requires that the observed patterns of legislative lobbying are not a result of participation opportunities in the bureaucracy (otherwise the legislative baseline cannot be taken as exogenous). We are not aware of any evidence or argument for why this requirement would not be met.}
bureaucracy, whether through the process of notice and comment or through service on advisory committees. The alternate forms of participation may open up the door to groups not represented in our data. Though studies that analyze the distribution of groups in notice and comment, for example, also find a significant pro-business bias, whether measured by participation (Golden 1998, Furlong and Kerwin 2005) or influence (Yackee and Yackee 2006).

Linking the lobbying efforts of groups across venues, and lobbying effort on policies across venues, reveals insights that single-venue studies cannot detect. In this paper, we have focused on the fact that participation in administrative policy-making by organized interests accentuates rather than attenuates the patterns of access and attention, and presumably any biases, that exist in legislative lobbying. But the general issue of venue choice allows analysis of many new questions and ways of assessing the policy process as a whole. Datasets containing detailed information on activities and expenditures, linking lobbying behavior across venues, are only now becoming available. But as they do it will be interesting to explore the competitiveness of the interest group environment in each venue, as well as how an interest group’s strategic problem of venue choice is related to the characteristics of each issue and the behavior of other, related interests.

Our approach is consistent with recent work that argues that research on interest group lobbying should pay greater attention to the role that issues play in determining interest group lobbying decisions and the characteristics of interest group lobbying communities.17 Groups are not unaware of the advantage of defining their issues in terms that increase their chances at success (Baumgartner, Berry, Hojnacki, Kimball, and Leech 2000). Our theory fits nicely with this perspective in that opportunities for venue choice vary across issues and groups should attempt to choose the venue most appropriate to their aims.

Our analysis of the distribution of activity across policy areas also raises some interesting issues. Most prominent is the similarity of the density of groups across policy areas. It is, to say the least, intriguing that the distributions are almost identical given that they one is from Washington, D.C. and the other is from Minnesota, that they are from different years and that they use different policy codings. At this point we have no convincing explanation of this finding.

Ultimately it may have something to do with the structure of government and the ability of

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17For general information on the Advocacy and Public Policymaking project, see their website at http://lobby.la.psu.edu/. A number of papers have come out of this project — for an overview to their approach and data, see Baumgartner, Berry, Hojnacki, Kimball, and Leech 2001.
governments to deal with separate issues at the same time. There is only so much attention to go around, so it makes sense that certain issues would receive a disproportionate amount of attention from organized interests in a given year. Further, there are certain policy areas in which government is more active or in which the affected groups are likely to organize and press their case in the capitol. As Gray and Lowery’s (1996) population ecology approach has made clear, the number of groups active in a given policy area depends on the relative size of that area both in the polity as a whole and also in the halls of government.

In order to get a better handle on these questions, it will help to see how the size of issue areas changes over time. If the same policy areas are always at the top, it would call for a different explanation than if they move around consistently. Recent work has begun to determine how government activities like holding hearings on a given issue affects the number of groups active in the that issue (e.g., Leech, Baumgartner, La Pira and Semanko 2004 and Lowery, Gray, Fellowes and Anderson 2004). Yet this does not directly address the similarity between the Federal distribution and the Minnesota distribution. Their concordance suggests that there may be certain principles of government and interest group attention to issues that hold across governments. Data from additional states and years may help determine whether our finding is a coincidence or indicative of something more systematic.
References


Table 1: Distribution of Lobbying Activity Across Venues

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<tr>
<th></th>
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</thead>
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<td></td>
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<td></td>
</tr>
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<td>888</td>
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<td>2,273</td>
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<td></td>
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<td>3.64%</td>
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<td></td>
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<td></td>
</tr>
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### Table 2: Tabulation of Venue Declarations per Group-Issue

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Table 3: Tabulation of Venue Declarations by Group-Issue in Minnesota, With Metropolitan Lobbying

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<tr>
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<td>2,273</td>
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Table 4: Frequency Distribution of Number of Legislative Lobbyists/Reports per Group-Issue by Attention to Administrative Branch

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<td>1</td>
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<td>2</td>
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<td>5</td>
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## Table 5: Distribution of Organizations by Lobbying Venue at the Federal Level

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<tr>
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<th>Both</th>
<th>Overall</th>
<th>Obs.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>At the Group-Policy Level</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business or Corporation</td>
<td>47.9%</td>
<td>44.9%</td>
<td>40.4%</td>
<td>43.0%</td>
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<td>19.0%</td>
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<td>5.9%</td>
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</tr>
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<td>Labor Union</td>
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<tr>
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<td>6.0%</td>
<td>3.0%</td>
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<tr>
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<td>6589</td>
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<table>
<thead>
<tr>
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<th>Legislative Only</th>
<th>Both</th>
<th>Overall</th>
<th>Obs.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>At the Group Level</strong></td>
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<td></td>
<td></td>
<td></td>
<td></td>
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<td>59.7%</td>
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<td>3.3%</td>
<td>3.3%</td>
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<tr>
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<td>3.0%</td>
<td>3.3%</td>
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</tr>
<tr>
<td>Other Institutions</td>
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<td>1.2%</td>
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<td>3,598</td>
<td>5,783</td>
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</table>
Figure 1: Distribution of Groups’ Legislative Lobbyists/Reports Conditioned on their Administrative Lobbyists/Reports, by Group-Policy Area
Figure 2: Total Groups per Venue by Policy Area (Axes on log scale)
Figure 3: Total Lobbying Activities in each Policy Area by Venue in Minnesota (Axes on log scale)
Figure 4: Comparison of Density of Groups Across Policies in Minnesota and at the Federal Level
Figure 5: Comparison of Density of Groups Across Policies in Minnesota and at the Federal Level by Venue

Administrative Lobbying

Legislative Lobbying

Minnesota
Federal