

## DOCUMENT RESUME

ED 464 954

TM 033 885

AUTHOR Lindle, Jane Clark  
TITLE Accountability Policy at the Street Level in Kentucky: Teachers and Administrators Debate the Fairness of Continuous Improvement versus Relative Standing.  
PUB DATE 2000-04-00  
NOTE 26p.; Paper presented at the Annual Meeting of the American Educational Research Association (New Orleans, LA, April 24-28, 2000).  
PUB TYPE Reports - Research (143) -- Speeches/Meeting Papers (150)  
EDRS PRICE MF01/PC02 Plus Postage.  
DESCRIPTORS \*Accountability; \*Educational Improvement; Educational Policy; Educational Quality; Elementary Secondary Education; \*Evaluation Methods; High Stakes Tests; State Programs; \*Teachers; Testing Programs  
IDENTIFIERS \*Fairness; \*Kentucky

## ABSTRACT

While scholars of educational accountability policy will not be surprised at the power of local implementers in modifying accountability efforts, Kentucky's street-level debate splits two constituencies in defining a fair system. Advocates for the education of all children including the poor and minorities support the continuous improvement model, while elite advocates support recognition of relative standing of schools. This paper includes data from teachers and administrators in four schools identified as eligible for state assistance under Kentucky's testing and accountability system. Of particular interest are the perceptions of accountability held by teachers and administrators in one school that had received rewards over two biennial periods prior to the current accountability designation. Across all four schools, teachers found the concept of continuous improvement unrealistic. Yet, many teachers accepted the apparent inevitability of emerging accountability requirements on their profession. (Contains 61 references.) (Author/SLD)

PERMISSION TO REPRODUCE AND  
DISSEMINATE THIS MATERIAL HAS  
BEEN GRANTED BY

J. C. Lindle

TO THE EDUCATIONAL RESOURCES  
INFORMATION CENTER (ERIC)

1

U.S. DEPARTMENT OF EDUCATION  
Office of Educational Research and Improvement  
EDUCATIONAL RESOURCES INFORMATION  
CENTER (ERIC)

☒ This document has been reproduced as  
received from the person or organization  
originating it.

☐ Minor changes have been made to  
improve reproduction quality.

☐ Points of view or opinions stated in this  
document do not necessarily represent  
official OERI position or policy.

# Accountability Policy at the Street Level in Kentucky: Teachers and Administrators Debate the Fairness of Continuous Improvement versus Relative Standing

By

Jane Clark Lindle, Ph.D.  
Associate Professor & Codirector  
University of Kentucky  
UK/U of L Joint Center for the Study of Educational Policy  
101 Taylor Education Building  
Lexington, KY 40506-0001  
(859) 257-8921/6734  
FAX: (859) 257-1015  
E-mail: [jcLind00@pop.uky.edu](mailto:jcLind00@pop.uky.edu)  
[www.uky.edu/Education/IER/joint.htm](http://www.uky.edu/Education/IER/joint.htm)

A paper prepared for the annual meeting of the American Educational Research Association (AERA), April 2000, New Orleans. Please do not quote or cite without permission of the author.

BEST COPY AVAILABLE

**Accountability Policy at the Street Level in Kentucky:  
Teachers and Administrators Debate the Fairness of  
Continuous Improvement versus Relative Standing**

**By**

**Jane Clark Lindle, Ph.D.  
University of Kentucky**

**Abstract**

While avid scholars of educational accountability policy will not be surprised at the power of local implementers in modifying accountability, Kentucky's street-level debate splits two constituencies in defining a fair system. Advocates for the education of all children including the poor and minorities support the continuous improvement model, while elite advocates support recognition of relative standing of schools. This paper includes data from teachers and administrators in four schools identified as eligible for state assistance under Kentucky's testing and accountability system. Of particular interest are the perceptions of accountability held by teachers and administrators in one school that had received rewards over two biennia prior to the current accountability designation. Across all four schools, teachers find the concept of continuous improvement unrealistic. Yet, many teachers accept the apparent inevitability of emerging accountability requirements on their profession.

Accountability Policy at the Street Level in Kentucky:  
Teachers and Administrators Debate the Fairness of  
Continuous Improvement versus Relative Standing

By

Jane Clark Lindle, Ph.D.  
University of Kentucky

**Introduction**

In a March 2000 briefing paper, the Education Commission of the States (ECS) lists several threats to the implementation of accountability systems in schools. First, ECS notes three stress-points that generate resistance to assessment and accountability systems, including the following:

1. Too much pressure
2. Fear of narrowed curriculum
3. Score discrepancies. (p.1)

Then ECS notes four challenges that disrupt implementation of high stakes assessment.

1. Discrimination
2. Testing security, cheating, and mistakes
3. Public concerns (defined as confusion and frustration, unfairness, poor or absent field testing, low passing scores for exit exams, and the stakes of exit exams)
4. Civil disobedience and organized resistance. (ECS, 2000, pp. 2-6)

A fall, 1999 survey conducted by Public Agenda reports that of all groups surveyed ( $n= 2335$  people), teachers were the most resistant to standards-based education. Parents, employers, middle and high school students, even professors of first and second year students in two- and four-year colleges thought most standards-based strategies important, yet poorly adopted (Public Agenda, 2000). These other groups are probably highly accurate in their conclusion that standards are poorly adopted: if teachers resist standards and they are most responsible for standards implementation, then the standards are likely to be poorly adopted.

While studies previously have shown the power of front-line professionals in adapting or circumventing innovative educational policies, accountability policies have raised tensions over teacher professional prerogatives and public accountability to a new level. From some professional perspectives, accountability policy is viewed as a punitive, insulting, and invalid approach to monitoring teacher performance and student achievement (i.e., Hartmann & Fisher, 1999; Jones & Whitford, 1997; Smith, 1991; Wong & Anagnostopoulos, 1998). From other public liability perspectives, "the concept of assessing student on their knowledge and skills seems a perfectly innocuous proposition" (ECS, 2000, p.1). This latter thought appeals to highly rational premises in a milieu that is highly politicized (Cibulka & Derlin, 1998). Perhaps the most critical influence on the politicization of accountability policy is that more recent accountability policies ambitiously promote better instruction through better testing (Cibulka & Derlin, 1998; Foster, 1991) and thereby encroach upon notions of academic freedom, professional judgement and other hallmarks of teacher professionalism (Bull, 1990; Ginsburg, 1997; Metzger, 1987; Soder, 1990).

Kentucky's approach to educational accountability has been at once highly rationalized, highly politicized, overly general and vague, highly innovative, very comprehensive, top-down, and bottom-up (Foster, 1999; Steffy, 1993). As a result, capturing the moments of this monumental accountability policy activity has proved to be a daunting task. Nonetheless, the purpose of this paper is to describe the political contest over the definition of school-level accountability in Kentucky's decade of education reform.

### **Conceptual Framework**

The Rand studies (Berman & McLaughlin, 1973; 1974; 1976; 1978 1979; McLaughlin & Berman, 1977) and McLaughlin's (1987) revisit of change implementation cleverly documented the power of local interpretation and local implementation of most policy initiatives. The concept of street-level bureaucrats addressing public policy in a locally adaptive manner also adds understanding to analyses

of educational policy (Capper, 1989; Crowson & Porter-Gehrie, 1980; Mandritch, 1978; Weatherley & Lipsky, 1977).

By definition, a street-level bureaucrat presents an institutional image to a constituency for which he/she must provide public service (Lipsky, 1976 as cited in Crowson & Porter-Gehrie, 1980, p. 46-47). The multiple dilemmas posed by high-demand, low-resources public service place the front-line policy implementers on a constant treadmill of leveraging for efficiency (Capper, 1989; Crowson & Porter-Gehrie, 1980). While the conceptual framework of street-level bureaucrat has been pushed empirically into the worlds of school district administrators and principals (Capper, 1989; Crowson & Porter-Gehrie, 1980; Weatherley & Lipsky, 1977), comparable reports on teachers as street-level bureaucrats are assumed, but lacking among the normal annals of empirical studies. This research assumed the negotiations between scarce resources and high demands of accountability policy would occur through teacher-principal interactions at the school site. Of particular interest were the school-level bureaucrats' interpretations of accountability policy.

### **Contextual Background**

The grand Kentucky initiative in systemic educational reform celebrated its tenth anniversary on April 11, 2000. Predicated by a challenge to Kentucky's school financing system, Kentucky's reform act represented an historic and almost unimaginable consensus among its three branches of government and citizen action groups (Combs, 1991; Dove, 1991; Foster, 1999; Steffy, 1993). The reform addressed three dimensions of the public school system: curriculum, governance, and finance. A legislative Task Force on Education Reform adopted 12 design principles for drafting specific features of the act (Foster, 1999; Task Force, 1989). Figure 1 illustrates the integrated nature of the systemic design.

---

Insert Figure 1  
About Here

---

While the new financing system, known as Seeking Educational Excellence in Kentucky (SEEK), provides an equalized per pupil base for schools, it also provides line

item support for specific programs. As shown in Figure 1, at the center of Kentucky's systemic reform is the proposition that better instruction leads to higher student performance. The line-by-line financial support provides resources for nine programmatic strands: (1) assessment and accountability, (2) preschool, (3) primary, (4) extended school services (ESS), (5) technology, (6) professional development (7) school-based decision making (SBDM), (8) regional service centers (RSC), and (9) family resource/youth services centers (FRYSC). Each strand was intended to provide a variety of supports for improved curriculum and higher student performance. The complexity of each strand often led to controversy. Among the relatively controversy-free strands are preschool, extended school services, technology, and family resource/youth services centers.

Some of the controversies erupted as implementation became visible. Primary was among the first initiatives for which teachers argued they were poorly prepared. Legislators responded by moving up the implementation date by two years (Appalachian Education Laboratory, 1998; McIntyre & Kyle, 1997). This was a mere opening salvo in the prolonged dysfunctional dance between teachers and legislators.

School-Based Decision Making (SBDM) produces periodic controversy as school boards and superintendents try to reassert their perspectives into the policy and employment processes now legislated to councils (Lindle, 1995/6; 1997, in press). So far, courts and the legislators have stayed the course with SBDM justifying their consistency with apocryphal anecdotes about the historical corruption in Kentucky school districts (Caudill, 1963; Foster, 1999; Holland, 1998; Miller, 1994; Steffy, 1993).

In 1998, assessment and accountability drew an unusual coalition of parent groups and the Kentucky Education Association to battle with the General Assembly, with teachers focusing on the fairness of accountability and parents deriding the reliability and validity of testing (Lindle, 1999). The resolution of the 1998 round of controversy regarding accountability and assessment involved four provisions: (1) a retooling of the assessment instruments to include more multiple choice items and less portfolio items, (2) a suspension of accountability sanctions until 2000, (3) a voluntary process for schools' participation in the state's remedial program for those designated as low-performing on the '98 assessment, and (4) a resetting of the algorithm for determining

accountability in the interim and the calculation of another algorithm for the post-2000 accountability system (Lindle, 1998; 1999).

While assessment and accountability were the scapegoats of the 1998 Kentucky General Assembly, professional development and, through guilt by association, Regional Service Centers drew negative political attention in the run up to the 2000 session (Harp, 1999; Stepp, 1998). During the interlude between the 1998 legislative session and the 2000, the then-Commissioner of Education, Wilmer Cody, drew attention to issues of teacher quality effectively up-staging another creature of the 1990 Kentucky Education Reform Act, the Educational Professional Standards Board (EPSB). Although every August, the EPSB establishes and implements yearly goals for the improvement of teaching and teacher preparation, and the Commissioner of Education serves as an ex-officio member of the EPSB, Cody issued an independent list of initiatives for improving teacher quality using a questionable database to justify his list (*Lexington-Herald Leader*, 11/15/1998; 11/17/98). Nevertheless, the Commissioner's ideas proved politically palatable as his statements coincided with reports on teacher quality from the National Commission on Teaching & America's Future (Darling Hammond & Ball, no date; Elmore, 1997), *Education Week* (Archer, 3/31/99), the Columbia Group, a Southern U.S. consortium (1997), the Kentucky-based Prichard Committee (press release, 12/24/1997), the *Lexington-Herald Leader*, one of the state's two largest newspapers (Blackford, 11/20/1998; Blackford, Johnson & Stepp, 11/15/1998; Stepp, 11/17/1998; Stepp & Blackford, 11/21/1998), and the Kentucky's General Assembly's Long-term Policy Research Center (Clements, 1998; 1999). In response, Governor Paul Patton issued Executive Order #99-118 on January 28, 1999, establishing a bi-partisan legislative task force to issue a report and draft a bill for the 2000 legislature on the improvement of teacher quality in the commonwealth. The task force met monthly from February 1999 through November 1999. An omnibus bill over 120 pages long was prefiled for the 2000 legislative session. Among other provisions, it included its own seeds of destruction in a section that required middle school teachers with any combination of grade-level certification (K-8, 5-8, or 7-12) to obtain a minor in an academic content area within two years. If a teacher did not fulfill the requirements for "content" certification in the specified period of time, s/he would be transferred into an elementary position and



effectively lose tenure (HB 437, Section 7). No other level of teacher certification was identified for this remedy. The violent legislative dance with the Kentucky Education Association lasted the entire session. An extremely modified bill was finally passed, but at this writing the implications and provisions are not yet clear. The Governor has not signed the bill.

For the purposes of this paper, two salient issues form a backdrop for the professional educators' perspectives represented in this paper. First, the accountability and assessment system existed in a form of suspended animation during the duration of the study. Second, the recent General Assembly's debate over teacher quality entwined with the uncertainty over the accountability system. In this context, comments about school accountability are often also comments about teacher accountability. Since the driving question of this research was what are the interpretations of state accountability by educators at the school level, the responses are heavily influenced by the political context of the commonwealth.

### Methods & Data Sources

Given the volatile history of Kentucky's accountability program, schools had until January 1999 to decide if they would participate in the interim voluntary state assistance program. Cases for this research were selected in February 1999. A four-case design was determined to reflect the conditions of assistance-eligible schools. Criteria for selection included individual school history with Kentucky's assistance program (repeat or new), school level (elementary and middle schools), and location (urban, suburban, or rural). All schools had to have a racially diverse population and a high poverty rate. Figure 2 illustrates the design of case selection.

Figure 2  
Case Selection Design

	Repeat assistance	New assistance
Elementary	urban	suburban/rural
Middle	urban	suburban

The highlighted cell, the elementary school new to the state assistance program, provided the wealth of data reported in this paper. This elementary school had been recognized across two biennia of Kentucky's original accountability system as a "reward" school. Because of its unique location in a suburb of one of the commonwealth's ten largest metropolitan areas, yet also in a highly agrarian, rural school district, the school's past successes and new decline presented an interesting case for investigating the school-level bureaucrats' interpretations of their rise and fall with the state's reform. For purpose of confidentiality, the pseudonym assigned to this school throughout this paper is Garnet Elementary School.

Project personnel conducted initial visits with personnel from the four schools. All four schools received five-day visits. Key school leaders, including principals, teachers and Highly Skilled Educators<sup>1</sup>, were interviewed concerning their reactions and expectations regarding the accountability program. Twenty-four classroom observations were conducted across the four sites. Of these observations, multiple observers gathered data for interrater reliability in seven classrooms distributed across all four sites. Sites were revisited in the fall of 1999 to ascertain the direction of school improvement. Data sources include teacher and administrator interviews, classroom observations, state, local, and school statistics. Data were triangulated and coded for thematic corroboration.

## Findings

A description of the school sets the stage for this school's educators' stories of the success and challenges with Kentucky's accountability system. Four findings are highlighted.

Location and Climate: Garnet Elementary's Setting. Garnet Elementary School proved a fertile choice for obtaining perspectives of school-level bureaucrats. Located in Kentucky, a state, which has exerted its prerogative to operate public schools hands-on, Garnet Elementary, demonstrates a number of features common to Kentucky schools.

Garnet's county was first settled in 1784, ten years before Kentucky became a state. Currently the county projects a 5% census increase from 1990. Its metropolitan

---

<sup>1</sup> As part of the re-vamped accountability system, Kentucky's highly successful Distinguished Educators program (see Lindle, 1999) was renamed "Highly Skilled Educators."

statistical area covers two counties, one from a neighboring state, and the projected population increase for this area is 18% (Kentucky Population Research center, 2000). The county's two high schools graduate around 450 new members of the work force each year. The county's industrial sector is growing. During the course of this study, a Japanese company broke ground for a new plant.

Finer, newer homes pop up on the edge of the largest population center, one of Kentucky's ten largest cities with roughly 32,000 people. Although the state of Kentucky is 92% white, this community is 24% African American with a growing Latino population of 3.5%. A neighboring military complex provides work for about 55% of the local working population. That means that the community has more than the state average of rental property. The state averages 35% rentals, while this city has 46% (Kentucky Population Research Center, 2000).

Although the community's poverty rate (18%) is below the state average (20%), children in school are poorer with a 26% poverty rate. The school district poverty rate for Kentucky is 24%, making this district among the poorer half of districts (Kentucky *Kids Count*, 1998). The district serves about 9000 students in 16 schools. The district enrollment rose 5% during this study (Kentucky Department of Education 1998, 1999).

Garnet Elementary School sits on a grassy rise next to a brick New England-style church. The neighborhood features single story concrete slab founded one and two bedroom homes. But only two streets, and three children, are a part of Garnet's attendance area. While most of the county's other elementary schools draw from pie-shaped attendance areas that slice through both the city and countryside, Garnet's attendance area is bounded mostly by the inner city. The attendance areas were determined about 10 years ago.

Architect Steven Bingler would point to this school as a "brick box" (Hill, 1999, p.34; *NEA Today*, 2000, p.31). The school dates to the mid-1960s. A sunny courtyard and glass foyer and another wing were added in 1978. A colorful mixture of fake stained glass runs vertically along the front of the cafeteria-gym. The school's entrance hall is festooned with a banner showing the school's name and mascot across the top. Underneath are three bold titles listing the school's recognition for rewards under the early years of KERA.

Garnet Elementary has about 580 students in Kindergarten through 5<sup>th</sup> grade, and lists 82% of them on free and reduced-price breakfast and lunch programs. Most of the 46% minority population is African American with some Latino and Asian students. The school district allows "school choice." That is, if parents provide transportation and the pupil-teacher ratio is not affected, then parents may bring their child to any of the district's public schools. This school boasts that 100 (about 17%) of its students "choose" their school. The "choice" students are typically described by teachers and the principal as better students from families whose occupations include doctors, lawyers, and teachers. Several of the teachers mentioned that they "chose" to send their children to this school because the faculty and school had such good reputations.

The school has a principal, a director of student discipline, and a guidance counselor. The school also features a Family Resource Center, two computer labs, and one Emotionally/Behaviorally Disordered (EBD) unit. The school provides a schoolwide Title 1 program, and with its low state assessment scores was eligible for and received a Comprehensive School Reform Demonstration (CSRD, also known as Obey-Porter) grant.

The Rise and Fall of Garnet Elementary School. Data tracking Garnet Elementary School's decline actually extends back to 1995. (See Table 1).

Table 1

School Accountability Scores Trend 2 <sup>nd</sup> Biennium (1994-96) through 3 <sup>rd</sup> Biennium (1996—98)			
1994-95	1995-96	1996-97	1997-98
51.9	40.9	39.4	36.8

Document #1-512099

None of the school's other demographics show any drastic changes over the same interval. As will be reported from the interview data, some professional practices may have had an influence on the score's decreases.

In contrast, the school seems to have made a turn around under the attention of the interim accountability system. Although the Highly Skilled Educator was only present in the school from January, 1999, and students were tested in the end of April, 1999, the school had some time to implement specific testing strategies. Although the results from the previous accountability system cannot be compared with the interim system, Table 2 shows some impressive gains.

Table 2

**4<sup>th</sup> Biennium (1998-2000)  
Interim (1998-99) School Result**

96-98 Score	"Predicted" Performance (2000)	98-99 Result	from 98	Difference from "prediction"
38.2	50.3	60.3	22.1	10

Adapted from Kentucky Department of Education, 2000.

The interim accountability index was not an *a priori* projection of possible growth as the former accountability system was calculated. Instead, the goals were not identified until after all student and school scores were aggregated for the 1999 results, and then linear regression established a "predicted" performance for 2000. At this point, Garnet Elementary school exceeds its 2000 "predicted" performance by 10 points and has moved 22.1 points from its index in the last biennium.

The analysis of educators' interviews presented here represents an initial level of understanding of the stories told in this school. To the extent that these stories seem verifiable with other evidence about Kentucky's accountability system, they are used in this paper. Because this is an initial analysis of data, these findings should be considered preliminary.

Overall four issues emerged regarding school-level bureaucrats' interpretation of the stresses and challenges associated with Kentucky's accountability system. First, we focus on some cultural issues between teachers and families. Next, we look at issues of leadership associated with the instructional demands of Kentucky's accountability system. These issues spill over into issues related to the structure of the accountability system including who is tested, whether the rewards and sanctions represent appropriate incentives, and educators' personal measures of their responsibilities.

### New Age Parenting & Teachers' Assumptions of Quality

Although the school has a high poverty clientele, the teachers and administrators rarely mentioned issues of poverty. However, issues of socio-economic status and social class were imbedded in several exchanges witnessed in interviews and observations. Two vignettes are used here to illustrate these subliminal tensions.

First, an exchange between an African-American teachers' aide and three Caucasian teachers occurred in the teacher's lounge regarding an after school program.

An older, Caucasian female, teacher was questioning an African American teachers' aide about an after school program planned for the next school year and run by the local YMCA. The African American teachers' aide reported that she had used a similar program for her child at another school. The older Caucasian female teacher kept saying that students shouldn't be on school property for so long (6 AM to 6 PM). Another Caucasian female teacher questioned the operation of the program: 'who was going to supervise it?'; 'who would collect the fees?' Although the African American teachers' aide kept reminding both teachers that the local YMCA would manage the program, the second teacher was certain some parents might drop off their kids and never pay. A third Caucasian female teacher speculated that parents that couldn't pay wouldn't be able to use the service. And the older teacher kept saying that students need something to do elsewhere. She argued that the Y would not provide good activities for the kids. The general substance of the remarks was that mothers should stay home with their children and that parents were irresponsible. None of the teachers recognized a point of view that this program might be a responsible parent's means of seeing that his or her child was not a "latch-key" child. In fact, none of the teachers talked about latchkey problems, although they did note that some students stood or sat in the parking lot of their own school until 4 or 4:30 PM — more than 2 hours after school was dismissed. The undercurrents of race, socio-economic status, and even intergenerational value differences permeated this discussion. (Field Notes #3, 5/11/99)

The second set of remarks represents a discrepant case among the teachers. This teacher noted the influence of the "choice" students on teachers' efforts.

Here's what I think. The different group of kids in my opinion is the different group of kids. The fact that the kids were high achieving, high achievers, had parents that were pushing them caused the teachers to work at that pace, that level to keep ahead, to keep beyond, to keep grasping and telling them, 'yes, yes, yes,' and 'this, this, this.' Then when you did have a next group that doesn't want to climb that high, doesn't want to learn that far, don't [sic] want to run that long and [then] you come down to that [level of ambition]. (Teacher Interview ALICOMM-T4, 5/12/99)

A commonly held view among teachers was that parents influenced the outcomes of students' achievement. In some cases, that view bespoke a certain professional

impotence in the challenges of high stakes accountability. Nevertheless, the climate at Garnet Elementary was highly empowering for teachers.

### A License Required:

#### Leveraging Leadership

A telling story of the role of leadership in negotiating instructionally-based and influenced accountability systems emerged in this school. The professional work ethic was really strong in this school. Teachers all thought they were working hard. They felt empowered and they credited the principal with creating the conditions for this hard work.

The principal was an experienced elementary school teacher, but had not been in the classroom for 10 years. He freely admitted that his teaching experience in a small rural building had not prepared him for being the principal of a large elementary school. Furthermore, the advent of the 1990 Kentucky Education Reform Act (KERA) precipitated curricular and instructional changes for which the principal felt untrained. As a result, he identified as many opportunities for teachers to attend state and regional workshops as possible.

The teachers all noted that they had been to everything and tried everything. They saw themselves as early adopters of most of the KERA innovations. They credited the principal with opening these opportunities to them

However, the profligate adoption and adaptation of multiple innovations, not surprisingly, was exhausting. Teachers acknowledged that one factor in their school's decline was people taking a break from the continual drive to do more new things.

Another mixed blessing in the principal's continual pressure for teachers to uncover the latest innovation was a strong sense of teacher empowerment. The blessing was mixed in that it also provided a factor in the school's decline. Although the principal had originally asked all teachers to participate in scoring 4<sup>th</sup> grade portfolios, tired teachers asked to get out of the scoring process. When the principal agreed, the 4<sup>th</sup> grade teachers began scoring portfolios alone. One of the first actions of the Highly Skilled Educator was to re-institute schoolwide scoring. Teachers who had taken the hiatus



remarked as to how the portfolio scoring had changed, and that knowing this would change some factors in their teaching.

Perhaps the most important recognition of how to manage high stakes accountability in this school came through the support of the Highly Skilled Educator. Teachers admitted that some of their school's decline came from their inattention to the school's curricular scope and sequence for a couple of years. Initially teacher interviews indicated that they expected the HSE to help them revamp the curriculum over the summer so it would be ready in the fall. In our fall visits, teachers seemed to have changed their thinking about "finishing" the curriculum. The Highly Skilled Educator articulated the change in her interview as well.

HSE: ... Curriculum alignment is never done. It's always in the revising ... steps. You don't just say, 'It's done. We're finished,' and put it away. I mean you're constantly looking back, again go back to your needs assessments, that kind of thing. You know with your family resource people we can work with them, do parent surveys and do the surveys and collect that kind of data. There is [sic] just so many dimensions.

Interviewer: One of the things that kind of struck me about ... when I came last spring they were all looking forward to it. But ... when you said that curriculum alignment is never done, [you] really sort of triggered my interpretation of what they were saying to me [last spring] was... 'Well we did this once and then we've just not gotten back to it.' And then it struck me that they were in that kind of mode of, 'We'll do it and get it over with.' ... do you think they've moved to understanding that they're always going to be doing this?

HSE: Oh yeah. I think they've moved into that mode. I think they, they realize that it's not something that you can do one day and it be over with. Even though you know we have gotten a lot of work done and we're at the stage now where we are piloting units of study. But the big key is 'pilot' because some of these units of study will end up being done away with ... because they just didn't meet our needs. We didn't really get out of that unit what we thought we would. Some of them will be revised and updated and then we will add new ones. I mean that whole process has really, I think, taken hold and [is] finally making sense because they are, they are in the implementation mode now of it. (HSE Interview, 12/7/99)



The Highly Skilled Educator was credited with getting the school more focused. Yet, the principal was cited as influencing the school council to voluntarily accept the services of the Highly Skilled Educator. By all accounts, the principal was a good leader in leveraging support, but the subtext suggested that both he and the teachers felt a certain attack on their professionalism by dint of their accountability status.

### Apples and Oranges: The Fruit of Professional Impotence

By far the most frequent initial response to the interviews seeking educators' explanations of how their school scores had fallen in the accountability system was the phrase, "apples and oranges." On the surface, this seems a factual remark. Kentucky's system originally tested two different sets of 4<sup>th</sup> graders in a two-year cycle of accountability assessment of elementary school performance. In 1994, the tests were split across 4<sup>th</sup> and 5<sup>th</sup> grades, so although one-half of the accountability cycle students is tested for 4<sup>th</sup> and 5<sup>th</sup> grade, two other groups of students in that cycle are tested only in 4<sup>th</sup> and only in 5<sup>th</sup> grade. In very small schools, with only one classroom of 4<sup>th</sup> graders or 5<sup>th</sup> graders, this type of analysis is very unstable (Petrosko, 1997).

In this school with a relatively large student body and a fairly stable population, it was difficult to unearth any striking demographic trends that might support the "apples and oranges" indictment. When pressed individually, teachers pointed to different low achieving groups. A 4<sup>th</sup> grade teacher might tell you it was the 5<sup>th</sup> graders, but the 5<sup>th</sup> grade teacher would tell you that it was the incoming 4<sup>th</sup> graders, the 5<sup>th</sup> graders were the best group she'd had in a long time.

Teachers' own assessments of student performance tended toward personal and tacit knowledge of students. Their sense of professional accountability was from the "trust me" school of professional expertise.

### Public Accountability and Reflective Practice:

#### Thank-You Testimonials and Light Bulbs

Teachers' assessment of their professional performance tended toward two generic responses: thank-you testimonials and light bulbs. Not surprisingly, teachers assess their

achievements in very personal ways. The external incentives promoted through the accountability system were simply not recognized as an affirmation of their work.

Affirmation came through the moments of teaching when a student or parent returned to say thank you or when the teacher saw the "light bulb go off" in a student's eyes. Thank-you testimonials tended to be represented in stories like this one.

Interviewer: Can you tell what difference you make as a teacher...when you try hard?

What kind of signals or information you get to let you know?

Teacher: That I've done it?

Interviewer: Uh, huh.

Teacher: I think probably one of the biggest things that happened ... The first year that I taught I had a little girl ...and I was teaching third grade. So this was the year that we had to make the decision if they were ready to go to fourth grade. And I kept thinking, 'She's not ready.' I've plead, I've worried, I've stewed and I talked to her...And her mother was very open when I had a conference with her. She said, 'Well, I think you are right. I think she's just not ready to go on. I think she's still too immature.'...She was born premature...So she was a little bit behind ... in development and that kind of thing. So she stayed with me and I kept her the next year. ... So she was in my room again. ... The child went on to fourth grade, did beautifully, did better that year. And her mother came to me when they got ready to move to Hawaii. [She said] 'I came to tell you goodbye...To tell you were the one teacher that has made a difference in my child's life.' She said she will never forget me, neither or [sic] will I... That was one good thing.

Interviewer: Uh, huh.

Teacher: Um... I've got kids that are in sixth grade right now from here that come back and say, 'You are the best teacher I ever had. You taught me so much and in myself I didn't think I need it.' ...I didn't think I had taught them that much.... I had my fourth grade, first year that I had taught full-time, fourth grade kids which are freshmen now and sophomores and they return to say that, 'You know, you taught us so much about writing, about how we feel...to express our feelings in our life.' (Teacher interview PET106-2, 5/14/99)

The light bulb stories are a bit more terse. Teachers express a tacit knowledge about how children learn in these stories.

Well... it's very, very rewarding when you can see children just like the light bulb comes on. You really understand that. Umm... I teach what would be a

traditional third grade. And third graders when they come to your room they are babies. But when they leave they are no longer babies. They have learned a great deal and it's always very rewarding to see them...It's kind of sad to see them go, but also you really feel like you have done something with them. (Teacher Interview CLEP114-T2, 5/10/99)

Despite pointing to their success as a reward school for two biennia, teachers did not feel validated by receiving the rewards. This exchange shows the at least minimal, and nearly insulting, role that rewards play in teachers' self-evaluation.

Interviewer: Do you see any direct effects on your efforts at trying to do a good job? Is there any way you can tell whether or not what you do makes a difference?

Teacher: As far as their test scores or anything in their life?

Interviewer: Anything in your life?

Teacher: Oh I don't know how you would do that. Unless when kids come back --- I don't have ---some parents that seem to think they do okay but as far as I --- I mean I ---

Interviewer: But you really don't get much feedback?

Teacher: No.

Interviewer: What about being a reward school for two biennia? Did that make any difference to you all?

Teacher: As far as?

Interviewer: Your sense of whether or not that you were getting a bonus for doing good work or---

Teacher: Well, yeah. But just like I knew when we got it that, I knew eventually we were not going to get it. And I knew how the other teachers were feeling because they work just as hard as we've worked. I haven't worked any harder when I got those moneys than I do now, you know. (Teacher Interview PADE205-T1, 5/10/99)

The conflict between public accountability and personal reflections on one's practice forms a conundrum found in the gap between assuring public confidence and indulging in professional prerogatives. In Kentucky, teachers feel deeply and personally responsible for other people's children, but they find public accountability a direct assault on their tattered, tenuous, and hard-earned semblance of professionalism.

## Conclusion

Garnet Elementary School's street-level bureaucrats are an excellent example of how professionals negotiate public policy. In the case of school accountability, messages from the state are interpreted as highly unprofessional. Despite this demeaning interpretation, the accountability signal apparently alerted these professionals to tighten their professional practices.

This phenomenon of contradictory feelings from professionals regarding the accountability system is not unique to Garnet Elementary School. Others have documented how teachers both love and hate the external pressure on school performance. Borko and Elliott (1999) quote a math teacher who after demonstrating the constraints of the accountability system, bemoans Kentucky's retrenchment on including math portfolios in the state assessment; "I'm really uncomfortable with that, because teachers aren't going to keep portfolios in their mathematics programs. There's no accountability. If there's not accountability, it's not going to happen" (p.400).

On the other hand, the educators' discomfort with the accountability system stems from its alien evaluative criteria. For at least eight years, Kentucky's teachers have been participants in an evidence oriented, data-driven system of accounting for teaching and learning. Yet, these teachers' self-assessments of their teaching and students' learning are highly personalized -- testimonials and light bulbs. Contrary to the arguments of teacher quality proponents (e.g. Clements, 1998; 1999; Darling Hammond & Ball, no date; Elmore, 1997, *Education Week*, 3/31/99, Prichard Committee/Columbia Group, 1997), these responses are not the result of a lack of knowledge and skills or even poor capacity building (Massell, 1998). The teachers in this case were veterans of numerous professional development initiatives all focused on addressing a data-driven accountability system. Nevertheless their professional culture supports highly personalized measures of performance: hard work, light bulbs and testimonials.

## References

- Appalachian Education Laboratory. (1998). Evolution of the primary program in six Kentucky schools. *Notes from the Field: Education in rural Kentucky*, 6 (1, Sept.), pp.1-12.
- Archer, J. (Mar.31, 1999). Out-of-field teaching is hard to curb. *Education Week*, p. 1, 8-10.
- Berman, P. & McLaughlin, M.W. (1973). Implementing innovations: Revisions for an agenda for a study of change agent programs in education. *Study of change agent programs: A working note*. (ERIC Document Reproduction Service No. ED 352 720)
- Berman, P. & McLaughlin, M.W. (1974). *Federal programs supporting education changes: A model of educational change. Volume 1*. (ERIC Document Reproduction Service No. ED 099 957)
- Berman, P. & McLaughlin, M.W. (1976). Implementation of educational innovation. *Educational Forum*, 40 (3, March), pp. 344-70.
- Berman, P. & McLaughlin, M.W. (1978). *Federal programs supporting educational change, Volume VIII: Implementing and sustaining innovations*. (ERIC Document Reproduction Service No. ED 159 289)
- Berman, P. & McLaughlin, M.W. (1979). An exploratory study of school district adaptation. (ERIC Document Reproduction Service No. ED 175 089)
- Blackford, L.B. (November 20, 1998). Extra training: costly, unchecked and, teachers say, often useless. *Lexington Herald-Leader*.
- Blackford, L.B., Johnson, L.J. & Stepp, H.E. (Nov. 15, 1998). State's teachers getting by on average, even failing, grades. *Lexington Herald-Leader*.
- Borko, H. & Elliott, R. (1999). Hands-on pedagogy versus hands-off accountability: Tensions between competing commitments for exemplary math teachers in Kentucky. *Phi delta Kappan*, 80 (5, January), pp. 394-400.
- Bull, B.L. (1990). The limits of teacher professionalization. In J.I. Goodlad, R. Soder, & K.A. Sirotnik (Eds.). *The moral dimensions of teaching*, pp. 87-129. San Francisco: Jossey-Bass.
- Capper, C. (1989). Country road-level bureaucracy: Special education in the context of rural poverty. Unpublished research paper. (ERIC Document Reproduction Service No. ED 307 077)
- Caudill, H.M. (1963). *Night comes to the Cumberlands*. Boston: Little, Brown & Co.
- Cibulka, J.G. & Derlin, R. L. (1998). Authentic education accountability policies: Implementation of state initiatives in Colorado and Maryland. In R.J.S. Macpherson, J.G. Cibulka, D.H.Monk, & K.K. Wong (Eds.) *The politics of accountability: Educative and international perspectives. The Politics of Education Association Yearbook*, pp. 84-97. Thousand Oaks, CA: Corwin Press.
- Clements, S. (1998). *What we know about professional development in Kentucky: Glimpses of ongoing metamorphosis, plans for the future*. Preliminary report to the Kentucky Department of Education Study of the Statewide Professional Development System in Kentucky. Lexington, KY: Policy Analysis Center for Kentucky Education, University of Kentucky.
- Clements, S. (1999). *Kentucky's teachers: Charting a course for KERA's second decade*. Frankfort, KY: Long-term Policy Research Center, Legislative Research Commission.

- Combs, B. (1991). Creative constitutional law: The Kentucky school reform law. *Harvard Journal on Legislation*, 28 (2), pp. 367-378.
- Crowson, R. L. & Porter-Gehrie, C. (1980). The discretionary behavior of principals in large-city schools. *Educational Administration Quarterly*, 16 (1), pp. 45-69.
- Darling-Hammond, L. & Ball, D.L. (no date). *Teaching for high standards: What policymakers need to know and be able to do*. CPRE Joint Report Series: JRE-04. Philadelphia, University of Pennsylvania Graduate School of Education, Consortium for Policy Research in Education.
- Dove, Jr., R.G. (1991). Acorns in a mountain pool: The role of litigation, law, and lawyers in Kentucky education reform. Lexington, KY: Prichard Committee.
- Education Commission of the States. (2000, March). High-stakes testing systems. *ECS Information Clearinghouse*. [on-line] < <http://www.ecs.org/ecs/ecsweb.nsf> >
- Elmore, R.F. (1997). *Investing in teacher learning: Staff development and instructional improvement in community school district #2, New York City*. New York: National Commission on Teaching & America's Future.
- Foster, J.D. (1991). The role of accountability in Kentucky's Education Reform Act of 1990. *Educational Leadership*, 48 (5), 34-36.
- Foster, J.D. (1999). *Redesigning public education: The Kentucky experience*. Lexington, KY: Diversified Services, Inc.
- Ginsberg, M. (1997). Professionalism or politics as a model for educators' engagement with/in communities. In M. McClure & J.C. Lindle, (EDS.). *Expertise versus responsiveness in children's worlds: Politics in school, home and community relationships*, pp. 5-12. New York: Falmer Press.
- Harp, L. (February 17, 1999). Kentucky to toughen standards for trainers. *Louisville Courier-Journal*, A1, A10.
- Hartmann, C.E. & Fisher, G.L. (1999). When good ideas become bad policy: Implications of the National Voluntary Mathematics Test. *Educational Policy*, 13 (3, July), pp.371-385.
- D. Hill (1999, May/June). Steven Binger describes a "brick box." *Teacher Magazine*, pp.34-38, 40.
- Holland, H. (1998). *Making change*. Portsmouth, NH: Heinemann.
- Jones, K. & Whitford, B.L. (1997). Kentucky's conflicting reform principles: High-stakes school accountability and student performance assessment. *Phi Delta Kappan*, 79 (4, Dec.), pp. 276-281.
- Kentucky Department of Education. (1998). *Kentucky schools directory, 1998-99*. Frankfort, KY: Author.
- Kentucky Department of Education. (1999). *Kentucky schools directory, 1999-2000*. Frankfort, KY: Author.
- Kentucky Department of Education. (2000). *Kentucky Core Content Test, Interim Accountability Cycle Mid point (1996-1997 to 1998-1999). School and district accountability results*. Frankfort, KY: Author.
- Kentucky Kids Count. (1998). Louisville, KY: Kentucky Youth Advocates, Inc.

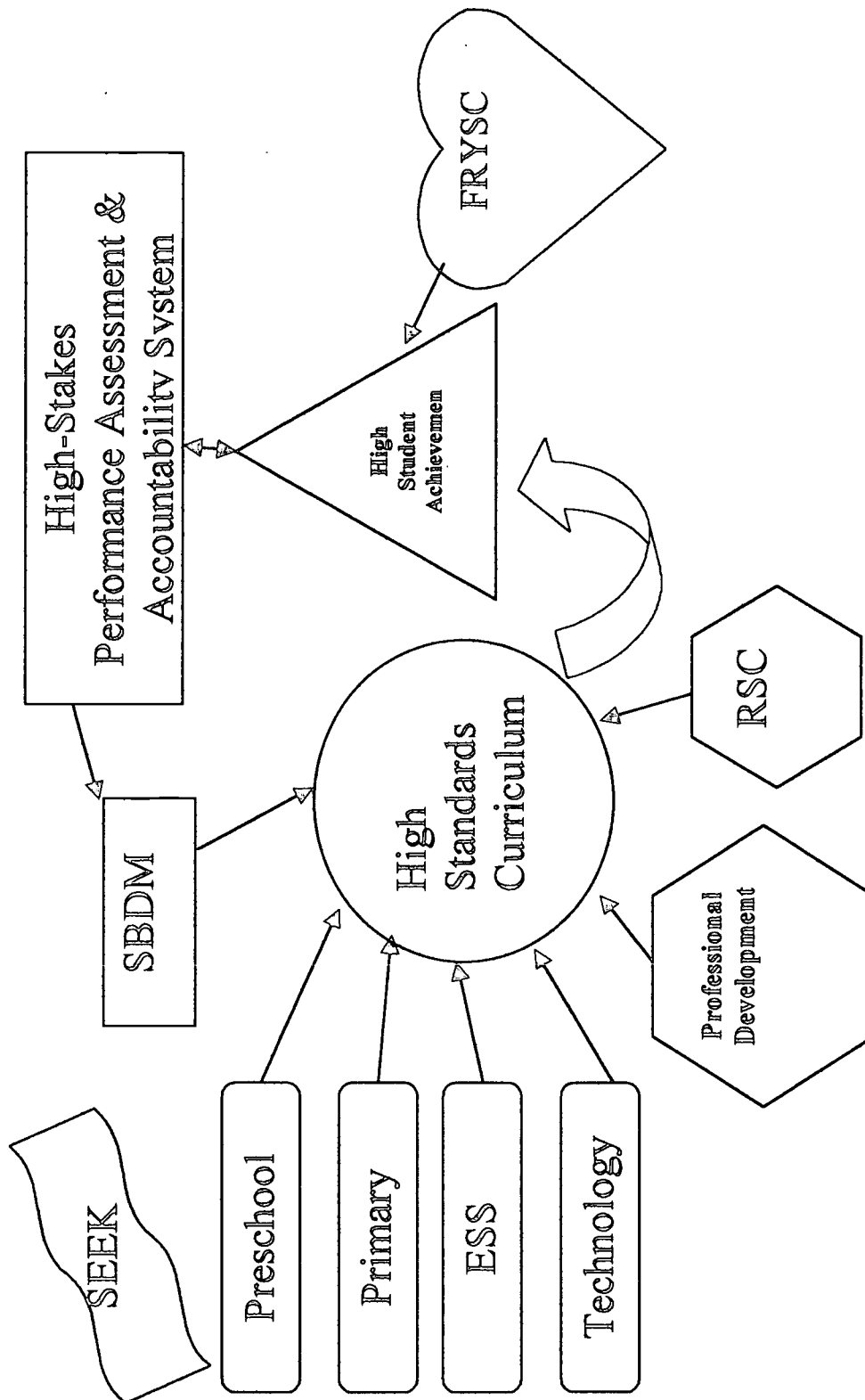


- Kentucky Population Research Center. (2000). *1998 population estimates*. [On-line].  
<<http://cbpa.louisville.edu/ksdc>>
- Lexington Herald-Leader*. (Nov. 15, 1998). Information on teachers spread out, incomplete. Hardware money lacking to gather and examine records, official says. *Lexington Herald-Leader*.
- Lexington Herald-Leader*. (Nov. 17, 1998). Cody offers ideas to improve teaching. Education Chief Wilmer Cody said his ideas were meant to start discussion. *Lexington Herald-Leader*.
- Lindle, J.C. (1995/6). Lessons from Kentucky about school-based decision making. *Educational Leadership*, 53(4), pp. 20-23.
- Lindle, J.C. (1997). School-based decision making. In Lindle, J.C., Petrosko, J.M. & Pankratz, R. (Eds.), *1996 review of research on the Kentucky Education Reform Act*, pp. 245-267. Frankfort, KY: Kentucky Institute on Education Research and the UK/UL Jt. Ctr. For the Study of Educational Policy.
- Lindle, J.C. (1998). *Fixing Failing Schools in Kentucky*. A paper presented at the Association for Public Policy and Management, New York (November).
- Lindle, J.C. (1999). *Hasn't anyone else don't this right? A field note on the political realities and perceptions in modifying Kentucky's high stakes accountability system*. A paper presented at the annual meeting of the American Educational Research association, Montreal, CA (April).
- Lindle, J.C. (in press). School-based decision making. In J.M. Petrosko & J.C. Lindle (Eds.). *Review of research on the Kentucky Education Reform Act*. Lexington, KY: Kentucky Institute on Education Research and the University of Kentucky/University of Louisville Joint Center for the Study of Educational Policy.
- Mandritch, J. (1978). The power of the street-level bureaucrat in public service bureaucracies. *Urban Affairs Quarterly*, 13 (3, March), pp. 285-312.
- Massell, D. (1998, July). State strategies for building local capacity: Addressing the needs of standards-based reform. *CPRE Policy Brief RB-25*. Philadelphia: University of Pennsylvania Graduate School of Education, Consortium for Policy Research in Education.
- McIntyre, E. & Kyle, D. (1997). Primary program. In J.C. Lindle, J.M. Petrosko, & R. Pankratz (Eds.). *The 1996 review of research on the 1990 Kentucky Education Reform act*, pp. 119-142. Lexington, KY: Kentucky Institute on Education Research and the University of Kentucky/University of Louisville Joint Center for the Study of Educational Policy.
- McLaughlin, M. (1987). Learning from experience: Lessons from policy implementation. *Educational Evaluation and Policy Analysis*, 9(2), 171-178.
- McLaughlin, M. & Berman, P. (1977). The art of retooling educational staff development in a period of retrenchment. *The Rand Paper Series*, P-5985. (ERIC Document Reproduction Service No. ED 147 954)
- Metzger, W. (1987). A spectre is haunting American scholars: The spectre of 'professionalism.' *Educational Researcher*, 16 (6), pp. 10-19.
- Miller, P.M. (1994). *Kentucky politics and government: Do we stand united?* Lincoln, NB: University of Nebraska Press.
- NEA Today*. (2000, January). Beyond the traditional brick box: Designing schools for the 21<sup>st</sup> century, p. 31.

- Petrosko, J.M. (1997). Assessment and accountability. In Lindle, J.C., Petrosko, J.M. & Pankratz, R. (Eds.). *1996 review of research on the Kentucky Education Reform Act*, pp. 3-50. Lexington, KY: Kentucky Institute for Education Research and the University of Kentucky/ University of Louisville Joint Center for the Study of Educational Policy.
- Prichard Committee/Columbia Group. (1997). *Teachers teaching in the Southeast*. Lexington, KY: Author.
- Public Agenda. (2000). *Reality check 2000*. [on-line].  
<<http://www.publicagenda.org/specials/rc2000/reality.htm>>
- Smith, M.L. (1991). Put to the test: The effects of external testing on teachers. *Educational Researcher*, 20 (5), pp. 8-11.
- Soder, R. (1990). The rhetoric of teacher professionalization. . In J.I. Goodlad, R. Soder, & K.A. Sirotnik (Eds.). *The moral dimensions of teaching*, pp. 35-86. San Francisco: Jossey-Bass.
- Steffy, B.E. (1993). *The Kentucky educational reform: Lessons for America*. Lancaster, PA: Technomic Publishing.
- Stepp, H.E. (Nov. 17, 1998). Teachers as students. Balancing act: Gaining knowledge, learning how to share it. *Lexington Herald-Leader*.
- Stepp, H.E. & Blackford, L.B. (Nov. 21, 1998). Calls from many sides signal that time is right for reform. *Lexington Herald-Leader*.
- Task Force on Education Reform. (1989). *Statement of principles*. Frankfort: Legislative Research Commission.
- Weatherley, R. & Lipsky, M. (1977). Street-level Bureaucrats and institutional innovation: Implementing special education reform. *Harvard Educational Review*, 47 (2), pp. 171-97.
- Wong, K.K. & Anagnostopoulos, D. (1998). Can integrated governance reconstruct teaching? Lessons learned from two low-performing Chicago high schools. In R.J.S. Macpherson, J.G. Cibulka, D.H.Monk, & K.K. Wong (Eds.) *The politics of accountability: Educative and international perspectives. The Politics of Education Association Yearbook*, pp. 31-47. Thousand Oaks, CA: Corwin Press.

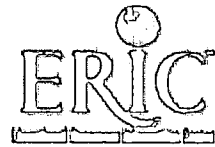


Figure 1





U.S. Department of Education  
Office of Educational Research and Improvement (OERI)  
National Library of Education (NLE)  
Educational Resources Information Center (ERIC)



## REPRODUCTION RELEASE

(Specific Document)

TM033885

### I. DOCUMENT IDENTIFICATION:

Title: Accountability Policy at the Street Level in KY: Teachers & Administrators Debate the Fairness of Continuous Improvement vs Relative Standing	
Author(s): Jane Clark Lindle, PhD.	
Corporate Source:	Publication Date: April, 2000

### II. REPRODUCTION RELEASE:

In order to disseminate as widely as possible timely and significant materials of interest to the educational community, documents announced in the monthly abstract journal of the ERIC system, *Resources in Education* (RIE), are usually made available to users in microfiche, reproduced paper copy, and electronic media, and sold through the ERIC Document Reproduction Service (EDRS). Credit is given to the source of each document, and, if reproduction release is granted, one of the following notices is affixed to the document.

If permission is granted to reproduce and disseminate the identified document, please CHECK ONE of the following three options and sign at the bottom of the page.

The sample sticker shown below will be affixed to all Level 1 documents

PERMISSION TO REPRODUCE AND DISSEMINATE THIS MATERIAL HAS BEEN GRANTED BY  <i>Sample</i>  TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)
--

1

Level 1

Check here for Level 1 release, permitting reproduction and dissemination in microfiche or other ERIC archival media (e.g., electronic) and paper copy.

The sample sticker shown below will be affixed to all Level 2A documents

PERMISSION TO REPRODUCE AND DISSEMINATE THIS MATERIAL IN MICROFICHE, AND IN ELECTRONIC MEDIA FOR ERIC COLLECTION SUBSCRIBERS ONLY, HAS BEEN GRANTED BY  <i>Sample</i>  TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)
---

2A

Level 2A

Check here for Level 2A release, permitting reproduction and dissemination in microfiche and in electronic media for ERIC archival collection subscribers only

The sample sticker shown below will be affixed to all Level 2B documents

PERMISSION TO REPRODUCE AND DISSEMINATE THIS MATERIAL IN MICROFICHE ONLY HAS BEEN GRANTED BY  <i>Sample</i>  TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)
---

2B

Level 2B

Check here for Level 2B release, permitting reproduction and dissemination in microfiche only

Documents will be processed as indicated provided reproduction quality permits.  
If permission to reproduce is granted, but no box is checked, documents will be processed at Level 1.

I hereby grant to the Educational Resources Information Center (ERIC) nonexclusive permission to reproduce and disseminate this document as indicated above. Reproduction from the ERIC microfiche or electronic media by persons other than ERIC employees and its system contractors requires permission from the copyright holder. Exception is made for non-profit reproduction by libraries and other service agencies to satisfy information needs of educators in response to discrete inquiries.

Signature: <i>Jane Clark Lindle</i>	Printed Name/Position/Title: Jane Clark Lindle, Professor	
Organization/Address: University of Kentucky/Dept. of Adm. & Subv. 111 Dickey Hall/Lexington, KY 40506-0017 USA	Telephone: (859) 257-8921	FAX: (859) 257-1015
	E-Mail Address: eaq@coe.uky.edu	Date: 04/29/2002

### III. DOCUMENT AVAILABILITY INFORMATION (FROM NON-ERIC SOURCE):

If permission to reproduce is not granted to ERIC, or, if you wish ERIC to cite the availability of the document from another source, please provide the following information regarding the availability of the document. (ERIC will not announce a document unless it is publicly available, and a dependable source can be specified. Contributors should also be aware that ERIC selection criteria are significantly more stringent for documents that cannot be made available through EDRS.)

Publisher/Distributor:
Address:
Price:

### IV. REFERRAL OF ERIC TO COPYRIGHT/REPRODUCTION RIGHTS HOLDER:

If the right to grant this reproduction release is held by someone other than the addressee, please provide the appropriate name and address:

Name:
Address:

### V. WHERE TO SEND THIS FORM:

Send this form to the following ERIC Clearinghouse:
---

However, if solicited by the ERIC Facility, or if making an unsolicited contribution to ERIC, return this form (and the document being contributed) to:

**ERIC Processing and Reference Facility**  
4483-A Forbes Boulevard  
Lanham, Maryland 20706

Telephone: 301-552-4200  
Toll Free: 800-799-3742  
FAX: 301-552-4700  
e-mail: [ericfac@inet.ed.gov](mailto:ericfac@inet.ed.gov)  
WWW: <http://ericfacility.org>

EFF-088 (Rev. 2/2001)