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# An Insidious Exchange: Racial Balance for Black Inferiority

Aleo Pugh  
*Pitzer*

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Reflective Essay

Aleo Pugh  
Library Undergraduate Research Award  
Reflective Essay  
2 April 2018

White attitudes towards school desegregation dominant the archive—white parents violently outraged at the prospect of Black students entering their lily-white havens. While oral testimonials, photos and video footage have cemented these images within the American consciousness, Black counter-discursive perspectives have deliberately been erased from historical memory. As such, my research intends to close this gap by centering working-class Black communities.

Rejecting the uncontested memorialization of *Brown*, my historiography is counter-discursive in nature. This complicated the ease with which I found sources, as the dominant narrative on school desegregation continues to haunt most scholarship. Given my focus on *Brown*, a court case, I immediately searched for critical assessments of integration produced by Black legal scholars. Using the library research guide generously crafted for my course by Jennifer Thompson, I consulted *America: History and Life*, *African-American Experience*, *African-American Biographical Database* and *Black Studies*. I came across critical race theorist and civil rights lawyer Derrick Bell's *Silent Covenants*. Bell offers a formative work in rethinking *Brown* and Civil Rights wins more generally, however his indictment of the wrongs of integration center Political Science. As an Africana Studies major, I intended my project to be interdisciplinary; however, my primary discipline is History. Howie's *The Image of Blacks in Brown* added an additional legal aspect, while Patterson's *Brown v. Board of Education: A Civil Rights Milestone and Its Troubled Legacy* provided a more historical analysis. While compelling secondary sources, none focused on the ways in which all-Black schools were understood by their working-class Black communities.

The most substantive secondary source available through the library was Charise Cheney's "Black Against Brown: The Black Anti-Integration Movement in Topeka, Kansas." I selected "Blacks Against Brown" because Cheney's research methodologies and strategies parallel my own. Most notably, Cheney critiques the NAACP's incessant pro-integration agenda in spite of Black opposition. With the NAACP a formative barrier to the needs of Black Topekans, this also inheres a class analysis as well, crucial to the orientation of my work. The NAACP was largely populated by middle-class Blacks and liberal whites with a vested interest in integration. As such, Cheney's work exhibits a focus on working-class Black Americans which is the subgroup of focus in my research.

After finding existing scholarly materials to substantiate my argument, I wanted to find primary sources centering the perspectives of working-class Black Topekans. I thoughtfully considered which modes of self-construal were available to working-class Black people. In what mediums were Black people allowed to represent themselves? Who documented these materials? What was their relationship to the documented? How did racial, classed, gendered, etc. dynamics invade the materials? Further, I considered the political nature of the archive: In what ways have Black people been systematically erased from the production of valid knowledge and authoritative histories? How have Black oral traditions, as a distinctly West African practice, been capitalized on to continue erasing Black history in a discipline where written materials are privileged? What did this mean for me as a researcher?

Initially, I decided to center Black newspapers as my primary source documents. I thought newspapers would be particularly interesting because of the anti-objectivist literary tradition of the Black press. Historically, in the white press, Black people were virtually nonexistent except for acts of criminality that conformed to preexisting racial scripts. According

to the white press, Black people neither lived nor died; graduated, nor made any noteworthy accomplishments. In effect, white media monopolized the documentation of history. In response, Black Americans adopted their pens as formative weapons against the state. Functioning as an alternative space where the meaning of Blackness was reconstituted, I anticipated that Black newspapers would offer a similar space where the meaning of integration was reconstituted. Small, local Black newspapers seemed a likely area where working-class Black Americans were able to express themselves.

Unfortunately, after consulting *African-American Newspapers: The 19th Century and Ethnic Newswatch*, I was unable to find any materials on my specific topic and location. In an unexpected turn, I had access to the Kansas Historical Society through the Claremont Colleges library. While holding a wealth of interesting material, it was rather difficult to locate many digitized Black newspapers from 1940-1960s. Some that I did find were completely illegible, or a small report on integration. However, through the Kansas Historical Society I found a silent film titled *Spirit of Washington* (1939-1941) to the dismay of traditional Historians everywhere.

*Spirit of Washington* is a silent film documenting a typical day at segregated Washington School prior to *Brown v. Board of Education* (1954) calling for the desegregation of all public schools. As a traditional field, History is characterized by dated epistemologies which complicated my undertaking of this research project. One of the primary principles of History is objectivity, created by the scientific nature of the written archive. Films are antithetical to the authoritative, objective histories History as a discipline clings to because they require some degree of theoretical work.

The use of visual materials is not only discouraged in History in lieu of written histories, but in many instances is grounds for rejection of an entire historiography. I used film because it

is an accessible means of self-authorization for people whom would otherwise be erased for the historical record.

I consider “An Insidious Exchange: Racial Balance for Black Inferiority” to be an incredibly formative intellectual pursuit. As an Africana Studies major hoping to pursue a doctoral degree in History, this project helped me understand the types of research I am interested in producing, as well as the institutional and archival barriers to its production. Turning to what academic Robin Kelley terms a “history from down below,” I am interested in focusing on working-class people in my historiographies which verges from the traditional focus on national organizations. I believe the most critical intervention of my research is in centering the systematically under/undocumented perspectives of the Black working-class. As a result, I will always have to negotiate with the archive.

I am invested in producing “nontraditional” histories that trouble the erroneous break between history and theory. I largely understand this partition as a larger political project to eliminate Black scholarship from the realm of valid knowledge. I refuse to allow the limitations of the archive to displace Black Americans from historical memory. From this research process, I came away with a more astute understanding of my historical standpoint -- much more theoretical, marginal and interpretive in nature.

Lastly, this project allowed me to reject the static notion of research that I entered with. The common research path presents one of linearity; moving from an abstract, to an annotated bibliography, to a literature review; however, research is quite messy. My research project continued to evolve as I was writing it. For me, this indicated that I was listening to what the archive was saying. It meant that I was capturing the truly dynamic nature of Black history; my principal interest in beginning my career as a Black academic.

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An Insidious Exchange: Black Inferiority for Racial Balance

Aleo Pugh

Africana Studies 10B.1: Research Methods

Maryan Soliman

2 April 2017



*Brown v Board of Education* (1954) has been inscribed within America's rhetorical legacy, memorialized as one of the finest moments in American law, and a landmark departure from its racially oppressive past. With the assertion that "separate educational facilities are inherently unequal," *Brown* is regarded as having fundamentally broken the back of segregation. Segregation's *de jure* displacement was celebrated among middle-class Blacks and liberal whites alike, considering *Brown* an unquestionable racial feat for Black Americans. The premature celebration of *Brown* overshadowed the judicial context out of which *Brown* emerged, as well as the range of Black American perspectives; crucial ruminations for the ruling to deliver any retribution. Focusing on the local particularities of the Topekan school district, the holistic glorification of *Brown* becomes all the more troubling. In a case purportedly overturning racism, its vestiges remained. With the racist assumption that Black inferiority made Black Americans emphatic beneficiaries of integration, communities prospering within the mandate's framework were indiscriminately destroyed.

Contrary to narratives of collective relief pervading historical writings on *Brown*, there was skepticism and even resistance to school desegregation within Black communities. When the NAACP initially filed *Brown* locally, it did not generate the greatest excitement within the city of Topeka, even amongst its theoretical beneficiaries (Patterson, 34). As a large national organization populated primarily by middle-class Blacks and liberal whites, the NAACP had an incongruous interest in assimilation, often unreflective of the communities it represented (McGuire, 84-96). External assessments of Black schools easily disparaged them by absorbing them all into a common Jim Crow narrative. This assumption, that all, all-Black schools were inferior and subject to overcrowding, underfunding and run-down facilities framed integration as the sole viable solution (Cheney, 488). This was perhaps a more reasonable conclusion when

applied to the rural South, plagued by the most visceral statewide institution of Jim Crow; however, segregation in Kansas was not quite comparable (Cheney, 484-485).

Unlike many schools dictated by segregation, the four all-Black and eighteen all-white neighborhood schools in Topeka had access to relatively equitable facilities and funding (Cheney, 488). To combat major issues of overcrowding and deterioration faced a decade prior, a \$850,000 bond was used to repair the schools (Rosenblum). As a result, Oliver Brown's principled objection launching the suit was less about facilities and more about the ways in which "...the system deprived some children – those who lived (as [his daughter] Linda Brown did) in racially mixed neighborhoods – of access to schools near their home (Patterson, 46). The segregation mandate required Linda Brown to "...leave home at 7:40 in the morning, walk through dangerous railroads, switching yards, and cross Topeka's busiest commercial streets to board a bus that took her to school..." (Patterson, 46). While Sumner School was located just seven blocks from her home, Linda Brown was required to make a long and arduous trek to the other side of town to attend Monroe elementary (Burgen).

Despite inconvenience and the burdensome commute initiating the case, these concerns were not raised to the Kansas Court, nor when the case was appealed to the U.S Supreme Court (Patterson, 47). Instead, Civil Rights lawyers led with psychology, indicting segregation as a dehumanizing system making Black students feel inferior (Bell, 67). In this reticulation from segregation as a logistical disturbance to one with psychological ramifications, racial balance rather than equal educational opportunity was the proposed antidote (Howie, 378). This not only mischaracterized the shared grievances of many Black Topekans regarding the practical insufficiencies of segregation, but forced them to concede a point that most cases in Topeka had never raised -- that Black schools were insufficient and offered substandard education.

Similarly, in the prelude to *Brown, Graham v. Board of Education of Topeka* (1941) addressed Black students' ability to enter junior high school in the seventh grade instead of the ninth and was opportunistically used to limn out declarations of Black inferiority (Cheney, 491). While plaintiff Ulysses Graham was troubled by the different placement systems for Black and white students, he did not regard Buchanan, one of the four all-Black schools as deficient or substandard. However, "...by law, [Graham's] attorney had to claim that seventh and eighth graders received inferior instruction at all-Black elementary schools...", implying that Black educators were substandard to their white counterparts (Cheney, 491). According to former principal Ridley of segregated Washington School and forty-nine year employee of the district, the majority of Black Topekans were satisfied with the schools as they were prior to desegregation suits (Cheney, 492). Even secretary of the NAACP Lucinda Todd and formative leader in *Brown* admitted that "...the Negro population was well satisfied with conditions in the schools until about 1938 when Mr. U.A Graham filed a lawsuit to integrate the Jr. High Schools in Topeka" (Todd, 1). The very case that cemented *Brown's* harmonious achievement was at odds with the needs of many of its community members. Further, similar to *Brown*, this successive case rejected the practicality of integration, though it was later exploited and inscribed into a mental and emotional argument.

The assumption that Black communities had "low self-esteem" and or actually "hated themselves," served as the dominant paradigm in social psychology until the mid-1960s with the rise of Black Power movements championing self-esteem and Black self-determination (Samuels, 20). Inverting this ahistorical notion, many Black educators had more advanced degrees than white instructors, academics were supplemented with lessons of self-esteem and racial pride, and teachers were visible members of their community with relationships to their

students (Blankenship). Black opposition to integration was rooted largely in concerns that dismantling segregated schools would also eliminate the rare environment of Black individual and institutional development that Jim Crow established (Cheney, 482). There was a clear tension between what Black Topekans wanted and the claims they were forced to make to gain credibility and entry into courts. In order to legitimize concerns regarding public school inequity, Black plaintiffs were effectively forced to affirm widespread beliefs of their inferiority and as a result, minimized their relatively high functioning schools.

Part of the Courts compliance with desegregation suits was the underlying acceptance of Black inferiority embedded within them. Although the concerns of both *Brown* and *Graham* lay in the logistical flaws of segregation as a poorly organized and inefficient model, civil rights lawyer Robert Carter and others working on *Brown* "...did not rely mainly on utilitarian arguments concerning the length of time that it took children to get to school" (Patterson, 47). Civil Rights lawyers neglected to emphasize that when a matter of free will, racially separate schools weren't inherently bad (Patterson, 47). Instead, they highlighted that "...the system of segregation in Topeka was legally required, and that it was reinforced. [As such], [c]hildren who were part of [this] officially sanctioned system, they said, were made to feel inferior [, leading to a loss of motivation]" (Patterson, 47).

In order to maintain the racial hierarchy in a case anxiously believed to overturn it, Black plaintiffs and lawyers were required to authenticate arguments in support of their own communities' devaluation. The utilitarian arguments raised by *Brown* and *Graham* were identified as illegitimate before they even reached the stands. Veering too far from racist presumptions of Black inferiority, their concerns were seized and immediately transcribed into a larger, more acceptable project of integration. Codifying into law that integration was endorsed,

not because Black people necessarily wanted to occupy white institutions, but purely out of convenience would symbolically delegitimize the magnetism of whiteness. Resolving this central contradiction, cases that did not explicitly mention the inferiority of Black institutions would never be plausible before the U.S Supreme Court.

If plaintiffs' Fourteenth Amendment rights were acknowledged as having been violated because of the poorly structured nuisance that was segregation, the ruling in *Brown* would not contribute to the larger project of white supremacy. However, plaintiffs' affirmation of their own inferiority by subscribing to claims of Black schools' innate inadequacy worked in tandem with pre-existing racial scripts. Applying pioneer of critical race theory and lawyer Derrick Bell's theory of interest-convergence, "Black rights are recognized and protected when and only so long as policymakers perceive that such advance will further interests that are their primary concern" (Bell, 49). The pervasive myth that Courts ruled in favor of plaintiffs in recognition of segregation's unconstitutionality is credulous. The social and political climate of the 1950s demanded an upswing in American race relations to strengthen claims of democracy (Bell, 59). This apparent racial development came with a serious caveat. In exchange for a symbolic sameness that did more to assuage American fears of Communist expansion than improve educational equity, Black Americans were forced to accept their own inferiority (Bell, 49). In true American tradition, Black Americans were again used as pawns in America's fragile democratic project.

Acceptance of Black inferiority was so critical to *Brown* that rather than its institution and simultaneous rejection of *Plessy* relying on unconstitutionality, psychological evidence took primacy. From the seminal psychological research conducted by Black psychologists Mamie and Kenneth Clark, titled "The Effects of Segregation and the Consequences of desegregation," the

Court concluded that "...racial segregation in public education necessarily damage[d] Black children, deprive[d] them of equal educational opportunities, and [was] inherently unequal (Howie, 377). This judicial reasoning emanated from near nothingness, divorced from any substantial constitutional roots. The Supreme Court failed to provide any conceptual, historical or analytical reasoning for their decision radically deviating from the earlier upholding of *Plessy* (Howie, 374-375). Rather, the Court's conclusion was influenced heavily by the nine "Findings of Fact" of the Kansas Court which determined that "...[s]egregation of white and colored children in public schools ha[d] detrimental effects upon the colored children[, and] is usually interpreted as denoting the inferiority of the Negro group (Patterson, 34). The Court concluded Black students were the sole group wounded by segregation because of Black school's inadequacy, so feelings of inferiority logically followed. It would have been egregious to suggest that Black schools offered an alternative education and environment that would make them preferential.

The Court's fixation on the psychological findings shifted the ruling from "...effect[s] of segregation on equal educational opportunity rights... [to] its psychological effects in public education..." (Howie, 378). In a decision that should have indicted segregation as an un-American and unconstitutional doctrine, the Court evaded explicit prosecution of segregation by focusing on its dehumanizing effects. The psychological evidence presented by Kenneth and Mamie Clark was merely confirmatory -- the Court had already gratuitously assumed, as did the majority of the nation, that it was in the nature of things for Black Americans to be damaged by segregation (Howie, 281). Conclusively, "...it was axiomatic that Niggers could benefit from integration" (Howie, 382). It was far easier for the Supreme Court to reconcile a decision shocking the system of white supremacy if it was accompanied by continued legal inscription of

Black inferiority. *Brown's* left-handed addendum to *Plessy* pacified Black Americans while avoiding justifications that would undermine the Court's authority in *Plessy* and set a meaningful precedent (Howie, 378). The Court's inflexible approach to integration functioned within its racist conception. To recognize the potential of Black schools when equipped with the same access would be in acknowledgement of Black success when not completely thwarted by a racial regime. This acknowledgement directly disputes a national keepsake -- that whiteness is essential to any institutions with the propensity for greatness.

The racist presumption that Black schools were inferior, and by extension unequivocally made Black students feel inferior, functioned as the basis for which all segregated schools were broadly marked as substandard in *Brown*. Without any regard for local communities thriving within the confines of segregation, all-Black schools were indiscriminately destroyed. When *Brown* was tried, Topeka had four segregated schools – Buchanan, McKinley, Monroe and Washington (The Capital-Journal). While enrollment rates fell slightly from 824 students across the four schools to an estimated 711 for the 1954-55 school year after integration, the enrollment drop-off was not hugely significant (The Capital-Journal). In spite of integration opening a new window of opportunity, which according to the Courts was in high demand, Black students still overwhelmingly attended all-Black schools. However, these institutions quickly began to dissolve shortly following *Brown*.

The myth that Black communities had nothing to lose and everything to gain from integration was wildly misinformed. In the September following the *Brown* decision, the school board stopped providing transportation for Black students (The Plain Dealer). This served as a barrier for families wanting their children to continue at all-Black schools, yet without the resources and time. Although the Courts did not explicitly mandate discontinuation of Black

schools, eliminating resources made their liquidation the outcome. Furthermore, even prior to the Court's decision, teachers were receiving letters from Wendell Godwin, the superintendent of schools for Topeka (Kansas Historical Society). Discussing her future employment, Darla Buchanan received a letter dated March 13, 1953 stating "[i]f the Supreme Court should rule that segregation in the elementary grades is unconstitutional, [the] Board will proceed on the assumption that the majority of people in Topeka will not want to employ Negro teachers next year for white children" (Kansas Historical Society). Integration posed a clear threat to the sanctity of all-Black schools by threatening access to transportation, the employment of highly qualified teachers and as a result, the futures of Black children. Given that opportunities for Black professionalism were already slim, this was incredibly consequential for Black students.

Bulldozing Black institutions for the totalizing project of integration not only eliminated post-graduate opportunities but expunged valuable representation. As Black students were displaced into white schools and Black schools were closing, greatly respected Black principals were relegated to janitorial positions in formerly white schools in order to keep their pensions (Bell, 124). This was the nightmarish futurity that the carelessness of *Brown* fashioned. Beyond the segregation mandate that secured Black students attendance at all-Black schools, their presence extended beyond requisition. In contrast to admissions of inferiority demanded on behalf of Courts and the stigmatized image of all-Black schools, they were often beneficial and affirming to attend. As illustrated in Joseph Thompson's film *Spirit of Washington* which captures the daily activities at one of Topeka's segregated elementary schools, there were undeniable benefits to attending all-Black schools -- a racially informed blind spot of the Courts.

Providing a counter-hegemonic education, Washington's community value can be attributed to its alternative and expansionist priorities. North American and Western European



psychological orientations are largely based in individualism while communalism is associated with people of African descent (Hurley). This is reflected in the methods of school, as the function of institutions is to reinforce the values and priorities of its community (Hurley, 56). As such, rather than framing school solely as a site for academic learning, practical skills and self and communal development were emphasized at all-Black schools. White American schools were characterized by a linear educational progression – a teaching *towards* – an indefinite beginning and end. In contrast, Black schools were concerned with building a holistic person.. Although all-white schools offered an opportunity for Black students to access resources made unavailable by segregation, in the relatively equitable Topeka, this simplified cost-benefit analysis was more complicated. Segregated Black schools gave students access to similar facilities and funding in addition to a stimulating pedagogy and practice. This was a major point of community pride, as evidenced by the film’s introductory intertitles reading “Washington Schools Presents (Thompson [00:00-00:05]).” Firmly centered and taking primacy over the title, the film functions as an offering – a gift on behalf of the school and its constitutive body.

As stated in the introductory intertitles of the film, school work extended beyond textbooks. “Heart and hand ha[d] been taught, character ha[d] been shaped, health ha[d] been guarded, and through work and play, the pupil ha[d] been helped towards organization and self-development (Thompson, [01:08-1:53]). While the differences in curriculum, methods of instruction and facilities were used to flag Black schools as second-rate in *Graham*, Black schools’ departure from such white normativity was the basis of community pride at Washington and was essential for students’ own pride and survival.

In contrast to the color-blind education that *Brown* was supposed to institute, in all-Black schools, the positions of Black students as classed and racialized subjects informed how and what

they were taught. In the 1930s for example, "...students began each day by singing the Negro National Anthem and [principle] Ridley insisted they learn black history" (Cheney, 489). With the recognition that white hegemony would berate them with messages asserting otherwise, constructing identities based in racial pride was a fundamental function of Black schools. This was not explicitly implemented in the schools' curriculum, but was a conscious choice based on faculty and administrators identifying the specific needs of the students they served. In integrated schools, equipped with racist teachers, peers, and textbooks historicizing Black inferiority, this type of intentional education would not have been offered.

At Washington School, one of the most striking elements documented in the film is the set-up of classrooms. In typical white American classrooms, students are placed in organized rows and sit in assigned, individual seats. The teacher is placed at the head of the classroom and a banking method of education is relied on (Freire). Students are expected to quickly absorb all information while maintaining a strict, school-appropriate decorum. In the film; however, Miss Marian Odell's kindergarten classroom is made up of large round tables, with several students seated at each of them (Thompson [05:03-05:11]). While some students are seated at tables reading books, others are engaged in a wide range of activities concurrently, including painting, rocking on a seesaw and playing with building blocks. This model provides opportunities for eye contact, conversation and community building. Positioned in activity-oriented clusters amongst peers and friends, the unconventionality observed in this kindergarten classroom seems to dissolve as Black students advance in their education; however, they still differ quite notably from white American schools.

In Miss Helen Jones' first-grade classroom, students are organized in the prototypical fashion, with desks neatly lined up in rows; however, "...the first grade[rs] open the days with

devotionals, followed by a snappy word drill” (Thompson, [05:51-05:59]). Standing adjacent to their desks, with eyes closed tightly and hands bound together, the first-grade students recite a spiritual reading in unison (Thompson, [06:00-06:04]). Immediately following, the students participate in a word drill where they come to the front of the classroom, select a word from the board and assign each word to the appropriate classroom item. Although first-grade students are placed in rows that typically resist collaboration, this set-up functions differently at Washington. It is not a tactic to curtail student participation or enforce discipline. The teacher is standing distinctly at the back of the room while students move throughout the classroom with minimal instruction. This disrupts the inherent power differential between students and teachers. Although less communal in nature, the rows of adjacent desks do not hamper student participation. Rather than students serving as containers into which educators must put knowledge, this communal style of learning allows knowledge to be created and shared in a hands-on, collaborative learning environment.

With the perception that racial balance symbolizes expanding civil rights, any skepticism regarding *Brown's* efficacy is immediately silenced. The innocuous liberal belief that racism has temporal boundaries dissipating with time is incredibly dangerous. In the instance of *Brown*, the dream of integration has yet to be realized, and this delayed development is only exacerbated by the grave sacrifices Black Americans were forced to make for its passage. In exchange for “good schools” -- antithetical to segregated schools regardless of their success, Black Americans were forced to submit to their own inferiority as the only avenue to secure improved conditions for their children. Inhered in the Court's requirement of inferiority was the belief that Black children must be allowed to attend public school with white children in order to get a good (or equal) education. Unable to fathom the hysterical possibility of Black schools' success being contingent

on their separation, the decision in *Brown* conflated a “good school” with an integrated school, and forced concerns diverging from this sentiment to be rearticulated.

The mirage of *Brown* has begun to wither away, and the shorts cuts to integration through racial balance have developed into worsening or stagnant conditions plaguing public schools in the modern era. Working towards racial balance, while not inherently flawed, has troubling potentials when not supplemented with the truth: that integration alone wouldn’t provide a quality education for Black students, particularly when integration was predicated on admissions of Black inferiority.

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Concept Map

# An Insidious Exchange: Racial Balance for Black Inferiority

A.

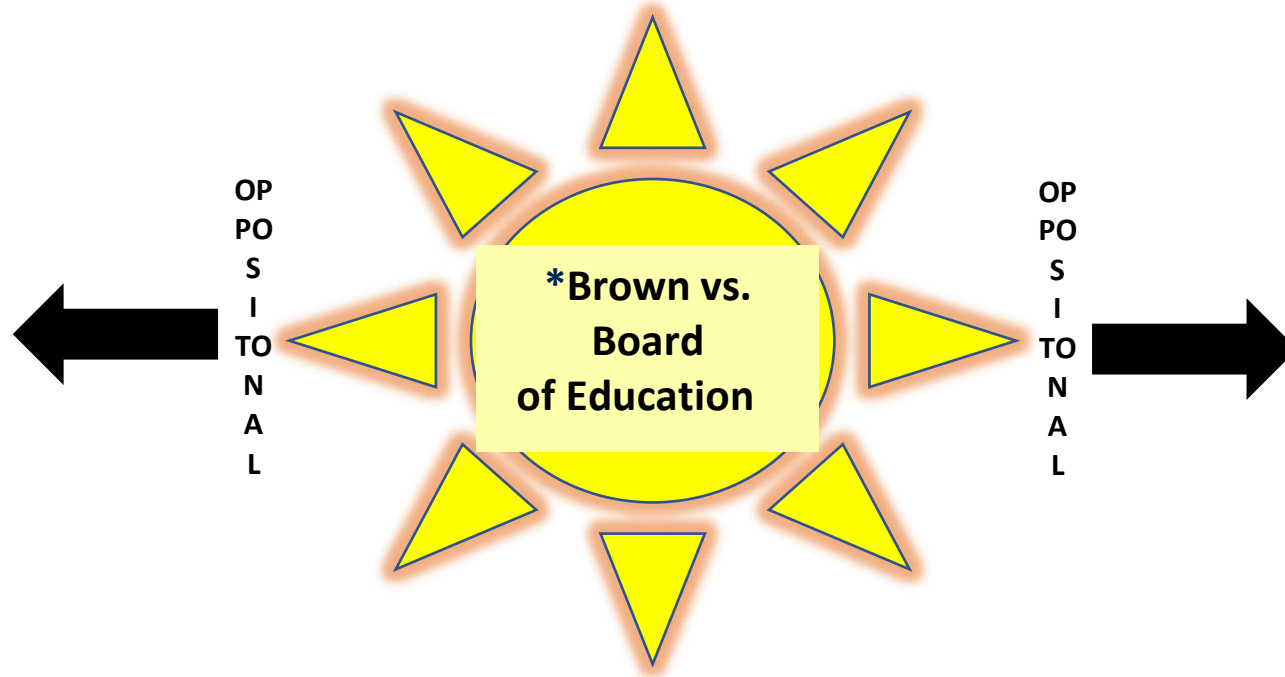
## INTEGRATION

= Education  
 Education = Good  
 Conclusion: Integration is **GOOD**



## SEGREGATION

= white racism  
 White racism = Bad  
 Conclusion: Segregation is **BAD**



B.

## Political Functions:

1. **\*\*Emphatic Beneficiaries**
2. **\*\*Degradation of Black schools**
3. **Invisibilizes Black resistance**

**\*\*Legal Reinscription of Black Inferiority**

**\*\*Maintenance of White Supremacy**

**Racial Balance**

C.

## Black working-class Perspectives: Topeka, KS

1. **\*Utilitarian arguments**
2. **\*\*Benefits of a segregated education**
  - Black newspapers & films



**Equal Educational Opportunity**

Library Resources

- **\*Cheney** – Blacks on Brown”
- **\*Kansas Historical Society**
- **\*Hurley** – “Self-Construal, Culture and Diversity”

Library Resources

- **\*Bell** – *Silent Covenants*
- **\*Howie** – “The Image of Blacks in Brown”
- **\*Patterson** – *Brown v. Board of Education*