Title
Exit, voice and loyalty : bureaucratic responses to presidential control during the Reagan Administration

Permalink
https://escholarship.org/uc/item/5cd288h4

Author
Golden, Marissa Martino

Publication Date
1991
EXIT, VOICE AND LOYALTY:
BUREAUCRATIC RESPONSES TO PRESIDENTIAL CONTROL
DURING THE REAGAN ADMINISTRATION

Marissa Martino Golden
Department of Political Science
and
Survey Research Center
University of California, Berkeley

Working Paper 91-18
Exit, Voice and Loyalty: Bureaucratic Responses to Presidential Control during the Reagan Administration

Marissa Martino Golden
Department of Political Science
and
Survey Research Center
University of California, Berkeley

Working Paper 91-18

Abstract

This paper employs a modified version of A.O. Hirschman’s exit, voice and loyalty framework as a means of evaluating two branches of the literature regarding bureaucratic behavior. It uses Hirschman’s nomenclature to assess the extent to which members of the career civil service in two government agencies (The Civil Rights Division and National Highway Traffic Safety Administration) were resistant or cooperative in response to Reagan’s application of the administrative presidency strategy.

Relying heavily on interviews conducted by the author in the two agencies, the paper finds that the bureaucratic response to Reagan was more complex than either outright resistance or cooperation, that certain factors limited the use of exit and voice within a given agency, and that the amount of resistance varied between the two agencies. The limits to the use of voice are explained by the point in the decision-making process (resistance is primarily pre-decisional). Inter-agency differences are explained by five factors: ideology, profession, agency esprit, agency history and careerist confidence. It is suggested that these explanations require further exploration in other federal agencies. It is also suggested that assessing the effectiveness of these response strategies is necessary in order to more fully understand the bureaucracy’s relationship with its principal, the presidency.
The Reagan presidency has become almost legendary for its concentrated assault on the bureaucracy and its use of what Richard Nathan has dubbed the “administrative presidency strategy” to bring federal government agencies and the career civil servants who work in them more directly under the control of the presidency. The Reagan administration used this strategy, which consisted primarily of strategic and ideological political appointments, budget cuts, personnel cuts and the centralization of regulatory review in OMB, to pursue its policy goals (many of which clashed with existing federal policy) administratively through the bureaucracy rather than legislatively through Congress. The components of this strategy have been well-documented (Nathan; Benda and Levine; West and Cooper; Rubin; Lynn; Goldenberg). The bureaucracy’s response to Reagan’s attempt to control it has received less attention (but see Lowery and Rusbult).

We would expect bureaucrats to be less than accepting of such efforts at control for a number of reasons. Among them are clashing ideologies between liberal bureaucrats and a conservative administration (Aberbach and Rockman); policy disagreements (Stehr); bureaucratic distaste for and resistance to change (Rourke; Heclo; Pious); bureaucratic protection of budgets and turf (Wildavsky; Niskanen; Heclo) and bureaucratic preferences for autonomy and discretion (Mosher; Pious). In short, given the “antibureaucratic” nature of the Reagan administration, the significant departure of its policy initiatives from the status quo, and the conventional wisdom about bureaucratic behavior, there is ample reason to expect, in the terminology developed by A.O. Hirschman, to hear bureaucrats’ “voice” and to see some exercise of their option to “exit” (Hirschman).

The conventional wisdom, however, is not unanimous on this subject and thus there are also reasons to expect bureaucrats to exhibit more cooperative behavior. Rourke notes that fear of “bureaucratic usurpation of power” from the presidency exists “in spite of the fact that genuine cases of bureaucratic challenges to presidential authority since the war have been a rare occurrence” (Rourke, p.219). James Q. Wilson has recently noted the same phenomenon, writing that: “What is surprising is not that bureaucrats sometimes can defy the president but that they support his programs as much as they do” (Wilson, p.275). A more cooperative bureaucracy could result from norms within the career civil service which encourage behavior that is more closely identified with a British model of the “yes minister” variety and the view that it is the job of the careerists to adapt to whomever their political bosses may be. (This model has been given a variety of labels including formal (Peters), passive extension of the presidency (Goldenberg), neutral competence (Kaufman; Ingraham and Ban) and overhead democracy (Redford) and harkens back to the politics/administration distinction).
These two competing views of bureaucratic behavior will be examined by looking at the actions and reactions of career bureaucrats in two government agencies: the Civil Rights Division of the Justice Department and the National Highway Traffic Safety Administration in the Department of Transportation, in response to the substantial policy changes which emanated from the White House during the Reagan administration. One body of literature, the more conventional one, portrays bureaucrats in a way that leads to the expectation of resistance, or in Hirschman’s vocabulary, exit and voice, while the other branch of literature suggests the more cooperative responses of loyalty and neglect. This paper examines which of these two sets of expectations regarding bureaucratic behavior is borne out in the two agencies studied. It does so by using a modified version of Hirschman’s framework to ask, to what extent do we find exit and voice in a bureaucratic setting? How did these responses (and their alter-egos loyalty and neglect) manifest themselves? What particular voice strategies were used? Why did career civil servants resist or cooperate to the extent that they did and why did they choose to use particular exit and voice strategies? In addition, the paper compares the two agencies to determine the extent to which bureaucrats responded in similar or different ways and attempts to account for these similarities and differences between agencies.

Exit, Voice and Loyalty

In Exit, Voice and Loyalty (1970), A.O. Hirschman uses the title concepts chiefly in an economic context to explain the reactions of consumers to decline in business firms and their products, though he also applies his theory to voluntary associations, trade unions, political parties, and to a lesser extent, to governmental organizations. To Hirschman, the exit option is exercised when “some customers stop buying that firm’s product or some members leave the organization” (p.4). In contrast, according to Hirschman, “To resort to voice, rather than exit, is for the customer or member to make an attempt at changing the practices, policies and outputs of the firm from which one buys or the organization to which one belongs” (p.30). More specifically, Hirschman defines voice as “any attempt at all to change ... an objectionable state of affairs, whether through individual or collective petition to the management directly in charge, through appeal to a higher authority with the intention of forcing a change in management, or through various types of actions and protests, including those that are meant to mobilize public opinion” (p30). Hirschman recognizes that different expressions of the voice option must be distinguished because voice “can be graduated all the way from faint grumbling to violent protest...”(.16). And finally, loyalty, in the context of Hirschman’s work denotes “attachment to a product or organization” (p.77). It is not a third option but rather serves as an intervening variable that “holds exit at bay and activates voice” (p.78).
Loyalist sentiments include disagreement with the organization, dissatisfaction and qualms but loyalist behavior is conditioned by loyalty to the organization. In Hirschman’s framework, this has the effect of “reluctance to exit in spite of disagreement” (p.98).

Hirschman’s work is primarily concerned with comparing the voice and exit options and enumerating the conditions under which one or the other will prevail and be more efficient. He moves beyond the world of consumers and business firms to develop a typology of the types of organizations which experience certain mixtures of exit and voice. The concern in the present paper is not in testing Hirschman’s theory and accordingly a more complete discussion of that theory is not presented here (but see Golden, Chapter 2). However, Hirschman’s work draws attention to the options that members of organizations have when faced with “decline” or, in the context of the current paper, policy change. The focus of this paper is in examining the specific reactions (exit, voice and loyalty) of a specific set of actors (career members of the civil service) to decline (change) in a specific type of organization (executive agencies). Viewing bureaucratic reactions through this prism should shed light on the issue of bureaucratic resistance.

In adapting Hirschman’s nomenclature to the context of bureaucratic response to presidential control, I have found it necessary to modify and expand that classification system. First the notion that bureaucrats viewed Reagan’s attempts at presidential control as “decline” is merely a hypothesis; hence the need to add an option that can accommodate the possibility that careerists viewed policy changes neutrally or even favorably. This is where my use of loyalty differs from Hirschman’s. I use loyalty as a stand-in for cooperation to include either of the following responses:

a) a response of cooperation and loyalty to the administration based on the philosophical principle that the role of the civil servant is to unquestioningly accept the direction of political superiors, or

b) loyalty resulting from loyalty to the Reagan administration based on policy congruence between the careerists and the president.

In addition, I add a fourth option, neglect, to accommodate career civil servants whose behaviors are not accounted for by exit, voice or loyalty. In their adaptation of Hirschman’s typology to a bureaucratic setting, Lowery and Rusbult also found it necessary to add a fourth response category which they called neglect. Following them, I define neglect as “passively allowing conditions to worsen” (Lowery and Rusbult, p.49). Neglect has two components. The first is attitudinal. Neglect contains the belief that conditions are “worse.” The second component is behavioral. Neglectful bureaucrats are “passively” acquiescent and compliant, not resistive. Bureaucrats who, like those exercising voice and exit, disagree with the
changes brought to their agency by politically appointed officials but who in spite of that disagreement comply with those appointees without resorting to voice or exit fall into this category. Neglect can also indicate cooperation with change agents due to uncertainty regarding agency mission or policy means. The critical difference between neglect and loyalty is the reason behind cooperation. Neglect is compliance out of apathy and lethargy. In short, neglect is the absence of any proactive protest response such as voice or exit in the presence of perceived “decline”. Despite its passive component, it is not passive resistance through mechanisms such as foot-dragging or deliberate slowdown of agency activities; it is not resistant at all.

In sum, bureaucrats appear to have had four possible options to employ as responses to the Reagan administration: exit, voice, loyalty or neglect. Two of these (exit and voice) are indications of resistance and two (loyalty and neglect) imply some measure of cooperation with executive authorities though for very different reasons. Which of these responses bureaucrats used has considerable significance for the way we perceive the bureaucracy and the type of behavior that presidents can expect from their subordinates.

Data and Methods

The principal source of data for this study is a series of in-depth interviews, supplemented by questionnaires, with thirty one current and former career civil servants in two federal agencies: the Civil Rights Division (CRD) of the Justice Department and the National Highway Traffic Safety Administration (NHTSA) in the Department of Transportation. A smaller number of congressional staffers and interest group representatives were also interviewed to obtain their views of the bureaucratic reaction in the two agencies. Interviews were conducted chiefly in Washington, DC in January and June, 1990 and were anonymous and confidential. Current civil servants at NHTSA were selected from the United States Government Manual, Federal Executive Directory and Federal Yellow Book and at the Civil Rights Division from the Martindale-Hubbell Law Directory as well as the other directories. Some former attorneys in both agencies were also found through Martindale Hubbell with the remainder of the former careerists interviewed located through networking and word of mouth. Accordingly, the sample is not random and may not be completely representative of former careerists. Selection criteria included experience in the agency prior to as well as during at least part of the Reagan years. Careerists at NHTSA tended to have higher GS rankings and to be more likely to be SES members because of the sources used to acquire respondent’s names but almost everyone interviewed was at least a GS-13 and in a professional position vested with authority and discretion. I had only one refusal at NHTSA and two at CRD although the return rate for questionnaires was slightly lower.
The open-ended questions in the interview schedule focused on appointee/career relations, self-reported bureaucratic behavior in response to presidential control efforts, and assessments of the effectiveness of bureaucratic and presidential strategies on actual policy change. The close-ended items on the questionnaire focused on the personal political beliefs of the respondents and on their evaluation of the influence of various political players over agency policy. While the sample size in this study is too small for statistical analysis, some frequencies are reported and the open-ended interview questions are used principally to chronicle bureaucratic responses to Reagan's attempt at control. In this respect, the number of interviews is more than sufficient and the nonrandomness of the sample is not a problem.

The two agencies were selected for their varied characteristics on the premise that organizational context may have a significant impact on the way bureaucrats reacted to the Reagan administration (Stehr). Both cases are agencies where Reagan clearly had an agenda and set of policy goals that represented a marked departure from those of the previous Carter administration. For this reason both are cases where we would expect an agency reaction. Yet the agencies vary in ways that are hypothesized to affect their response such as agency mission, policy domain (regulatory versus nonregulatory), dominant profession in the agency (attorneys versus engineers), interest group environment and the types of control measures that were used by the administration.

The Civil Rights Division

The Civil Rights Division is located in the Department of Justice. It was elevated to the status of a Division in 1957 and is headed by an Assistant Attorney General for Civil Rights, a politically appointed position requiring Senate confirmation. William Bradford Reynolds held this post throughout Reagan's tenure. The Division gets its enforcement responsibilities from the Civil Rights Acts of 1957, 1960, 1964, and 1968, the Voting Rights Act of 1965 (renewed in 1982), the Fair Housing Act of 1968 (and 1988 but that legislation went into effect after the period under study), the Equal Credit Opportunity Act of 1974, the Equal Educational Opportunities Act of 1974 and the Civil Rights of Institutionalized Persons Act of 1980 (CRIPA). Responsibility for these statutes is shared by a host of other agencies but the Civil Rights Division shoulders primary responsibility for a number of enforcement activities. Enforcement is carried out by CRD's approximately 150 attorneys through investigations, negotiations, the filing of suits, and the filing of amicus curiae briefs. These attorneys are divided into functional units called Sections. Each Section is headed by a Section Chief who is
typically a career person. Section Chiefs are usually the highest ranking careerists in the agency. 

Ronald Reagan arrived in Washington with a clear agenda for policy change. His policy goals in the area of civil rights were clear and were forcefully expressed not only in his speeches and press briefings but in those of the Attorneys General and Assistant Attorney General and in the Special Analyses prepared by OMB that accompanied the budget to Capitol Hill (Weekly Compilation of Presidential Documents; U.S. Justice Department; U.S. Senate Committee on the Judiciary; OMB). At the forefront of this agenda Reagan sought to change the remedies of affirmative action quotas and timetables, and school busing used by the government and the courts in discrimination cases (Bawden and Palmer; Govan; Wines; Yarbrough; National Journal).

Reagan’s use of the administrative presidency strategy at CRD was quite simple. At its core was the appointment of an ideologically committed attorney, William Bradford Reynolds to the position of Assistant Attorney General. All (100%) of the survey respondents credited Reynolds as having had “the most” influence over agency policy during the Reagan years, more than the president, Congress or the Attorney General. The Civil Rights Division did not experience budget cuts or RIFs and, since it is not a regulatory agency, it was not subject to OMB regulatory intervention.

The changes initiated by the Reagan administration at the Civil Rights Division parallel the causes political scientists have traditionally argued lead to bureaucratic resistance: policy redirection; turf threats; loss of autonomy and bureaucrat-bashing. The most prominent policy changes were those involving remedies sought in employment discrimination cases and school desegregation cases. But those were not the only policy changes that the agency experienced. There were changes that affected the pursuit of voting rights, housing rights, and the rights of institutionalized persons as well. In many cases these policy changes required the Division to switch sides in cases already in progress or to rescind earlier filings in pending cases. (See Govan for a thorough analysis of Reagan administration changes. See also, Golden, 1990).

In terms of the day to day running of the agency, Reynolds ruled the Civil Rights Division with an iron hand, centralizing control of the agency in the Assistant Attorney General’s office, instituting a system under which almost all of the work of the career attorneys came to be reviewed by politically appointed special assistants or by Reynolds himself, and generally reducing the autonomy and discretion of the career attorneys. Reynolds also increased the number of political appointees in the agency by hiring Schedule
C Special Assistants to serve in the office of the Assistant Attorney General. The strategy of increasing the number of appointees in the Division had two chief effects on the workings of the agency. The first was that the appointees took to handling cases themselves, something that had traditionally been done only by the careerists. The second effect of this control strategy was increased review of the careerists' work by the appointees. (For a more complete discussion of presidential control at CRD see Golden, Chapter 3).

These changes reflected a lack of trust on the part of the appointees toward the careerists. Although this changed somewhat over time, Reynolds and his appointed subordinates were, at least initially, highly distrustful of the careerists and displayed the same antibureaucratic attitudes noted in other research on the Reagan administration (Lowery and Rusbult; Waterman; Rector and Sanera; Ban and Ingraham).

Finally, there was an ideological cleavage between the careerists and the appointees. Reynolds, Meese, and Charles Cooper (one of the schedule C deputies) are all active members of the Federalist Society, a conservative organization committed to a conservative agenda. Almost all of the career respondents, when asked, "In your opinion, what was the degree of partisanship among the Reagan appointees?" responded with either of two adjectives to describe Reynolds: "ideologue" or "zealot". By contrast, none of the respondents in the study were self-identified conservatives and 12 out of 17 labeled themselves as liberals (one was a Republican). In one interview, an attorney commented that in her Section, out of a Section of about twenty attorneys as far as she could tell there were only two Republicans.

Voice at CRD

Voice was by far the predominant response of career attorneys of all ranks in the Civil Rights Division. It was engaged in almost universally. Even those who I later refer to as loyalist or neglectful exercised the voice option to some extent or in response to some incidents. Almost all of those who exited, except those who left the agency between November, 1980 and January, 1981 before the Reagan administration actually took over the reins, responded with their voices before resorting to exit. Voice was used because career lawyers held strong convictions that many of the Reagan administration's civil rights policies were seriously misguided, detrimental to the effective enforcement of civil rights, and in conflict with existing statute and case law. Not all respondents articulated this view as clearly as the CRD attorney who believed that, "[our] ultimate boss is not Reagan or Reynolds but the courts. They set the law. That's why attorneys disagree."
They take an oath to carry out the law.” But those who used voice gave other indications that they shared her sentiment. This section will focus on four mechanisms through which voice was (or was not) exercised: voice in the form of oral argument and memoranda, collective action, leaks, and sabotage.

Voice by argumentation

Career attorneys used their voices most vociferously to argue both orally and via written memoranda with Reynolds and other appointees. As one attorney commented, “one thing attorneys like to do is argue.” Another said, “we’re a noisy lot.” I call this expression of voice, voice by argumentation. It implies voicing disagreements over policy or procedure directly with political appointees either in face to face meetings or through written memoranda advocating a point of view.

Division attorneys were not hesitant to use this mechanism to exercise their voices. There was considerable consensus among both current and former career attorneys that people were frank and open about their disagreements with Reynolds. They were not hesitant to express their point of view when it differed from Reynolds, and most were not worried about reprisals or other repercussions. One thing they all give Reynolds credit for is being accessible and willing to hear out their arguments whether or not he was persuaded. One thing that they all felt comfortable doing was presenting their case whether it was in person or in the form of memos. “Brad would hear you out,” a number of respondents commented. “He might not do it but his door was open,” added one. A Section Chief described the standard operating procedure in his Section, “We had lots of meeting on ... and lots of arguments with Brad on [it].”

The lawyers at Civil Rights acknowledge that they became quite adept at formulating those arguments most likely to win Reynolds over. They came to know the types of arguments he found persuasive. It was in this way that they developed their voice -- incrementally, one pleading, brief or case at a time, using the same voices that they were used to using in court, to point civil rights policy in the direction which they believed was more consistent with the law.

Collective Action

Collective action implies a group of bureaucrats acting as a group. This can be contrasted with the modus operandi of individual attorneys arguing the merits of individual cases. Though it was common for supervisors and Section Chiefs to support their attorneys, this does not constitute collective action. The group had to extend beyond those directly involved in a case. To
be labeled a collective action, it must involve more than two individuals and must reflect a conscious effort to organize.

In spite of the active use of some types of voice by Division attorneys attempting to resist control, collective action was rare at CRD. There were two protest memos one of which followed the decision of the Justice Department to side with the Administration against the IRS in the Bob Jones University case. The case involved the tax exempt status of religious schools with discriminatory policies (in this case a discriminatory admissions policy and a rule prohibiting interracial dating). The other petition was written and signed by more than 100 careerists in the Division after one of the politically appointed deputies, Robert D'Agostino, stated in a memo regarding the much-publicized Yonkers case, a case involving both educational and housing discrimination in Yonkers, New York, that "blacks, because of their family, cultural and economic background are more disruptive in the classroom" and therefore "would benefit from programs for the emotionally disturbed" (Brownstein and Easton). Both petitions were directed to Reynolds; the first requested that the agency support the IRS, the second called for D'Agostino's resignation.

Collective action also occurred when early in the administration career attorneys, who were themselves members of racial or ethnic minorities, met with Reynolds to discuss their policy disagreements. According to one of the attorneys who attended the meeting Reynolds was receptive to meeting with them but not to their policy views.

The only other collective action that was related to me was spontaneous, not a planned group resistance movement. It also had little effect on policy. It pertained instead to the annual office Christmas party, historically an eagerly anticipated event. Reynolds decided to change the nature of the party and raised the cost (paid for by employee contributions) significantly. Since no one wanted to socialize with Reynolds and his deputies anyway, almost everyone decided that the party was too expensive and in effect boycotted it. While this was a symbolic act of rebellion, it hardly challenged agency civil rights policy.

The lack of collective action seems to be due to a combination of professional and bureaucratic norms as well as the nature of the work these bureaucrats engage in. By the latter I mean that lawyers are assigned to cases and while there is often more than one lawyer assigned to a case there are rarely more than two or three. The grievances that emerged were on a case by case basis stemming from disagreements on how to handle those individual cases. Reynolds contributed to this by rarely issuing memos with specific guidelines or blanket statements of policy direction. One former
Civil Rights attorney felt that Reynolds did this to avoid providing ammunition for leaks or as another put it "to avoid seeing his memos turn up in the Washington Post." But it also had the effect of not giving groups of bureaucrats anything to rally around. Even the highest ranking career people, the Section Chiefs, learned of policy mainly on this case by case basis. As a result, disputes, for the most part focused on individual cases. By contrast, in the D'Agostino example there were two things about D'Agostino's remarks that made him a target for collective action. First, his remarks provided a concrete statement behind which careerists could rally. Second, the careerists' action did not directly concern a policy issue over which appointees could claim to have decision-making authority but instead involved what careerists viewed as inappropriate behavior that reflected poorly on the agency.

Leaks

Leaks have a murky status as a voice tactic. On the one hand, whistleblowing is protected by law to encourage bureaucrats to alert the public and those charged with oversight (Congress) of wrongdoing in their agency. On the other hand, executive branch politicians spend a great deal of time trying to stifle leaks. In fact, leaks are used by both civil servants and appointees. They are used to get information out of the agency and into the hands of those in Congress, interest groups and the media who might be able to use the information in a way that those leaking the information have been blocked from doing by their superiors.

Leaks did occur in the Civil Rights Division during the Reagan years though only to a limited extent. The attorneys did not feel that leaks were appropriate behavior. Leaks were controversial because for the most part they involved specific cases and not only are lawyers prohibited from discussing pending cases but civil servants more generally are not allowed to discuss pre-decisional material. This information is protected from disclosure by the Freedom of Information Act. Many of the lawyers interviewed were offended merely by my asking them about such behavior. When leaks were used it was often to reveal the racially insensitive comments of Reynolds and his deputies such as Reynolds reference to the black parents in a South Carolina school desegregation case as "those bastards", rather than to publicize internal policy deliberations (Senate Judiciary, 1985). Other leaks were what one respondent referred to as "red flags", information designed to alert Congress to internal agency problems but contained in ordinary informational packets or budget requests prepared by career staff for Congress at congressional request.

With respect to Congress, current and former careerists alike
complained that members and staff on the Hill did not know enough about the substance of the issues to pick up on the red flags sent to them and were more likely to respond to leaks of a non-policy nature (like the one described above) in a symbolic manner by lambasting Reynolds during hearings but without any concrete action. This limited the incentive to engage in leaks of this nature.

Sabotage

One additional type of voice behavior often attributed to the bureaucracy is sabotage (Heclo). A dictionary definition of sabotage as an "underhanded effort to defeat or do harm to an endeavor" or to "obstruct productivity or normal functioning" is sufficient for the present purposes. Manifestations of sabotage in the agency under study could hypothetically include deliberately losing cases, deliberately missing court deadlines, providing false information to political superiors or not following the specific orders or instructions of those political superiors.

Sabotage was anathema to the attorneys at Civil Rights. These attorneys have highly developed professional ethics. Deliberately presenting weak arguments in a case or deliberately losing a case were simply not considered. Comments on this behavior showed little variation: "You try to win the case or you don't go on the case"; "It is unprofessional and unethical to act as a double agent;" "The only example I know of is Grisswold in the Pentagon papers case. He threw it" (a decade before Reagan). Rather than sabotage a case, if an attorney felt that he or she could not in good conscience make the arguments that the appointees wanted made in a given case, the attorney would ask to be removed from that case. Attorneys did in fact ask to be taken off cases during the Reagan years though it was not a common occurrence. However, as a number of them commented, "if you need to ask to be taken off enough cases then, its time to leave". Nor did attorneys provide their political bosses with false information. As time went on they certainly became more astute at presenting their case in a certain light in order to win approval from the noncareer personnel, a tactic discussed above, but my interviews do not reveal any instances where careerists actually misled the appointees or withheld information. Nor did respondents give any indication of any deliberate slowdown of work in the agency.3

Exit

Exit did occur in the Civil Rights Division, but it was not widespread. Precise numbers of exiters are difficult to come by for several reasons. First, turnover is always high in Justice Department agencies. For example,
31 lawyers left the Division in 1974, 24 in 1978 and 24 in 1982. Civil Rights Division attorneys feel more confident than other types of civil servants that due to the prestige of the Justice Department their job prospects outside of government are fairly promising. Few of the respondents in this study joined the agency expecting to make a career of government service (although many have ended up staying for over 20 years). Thus, it is not possible to count the number of people who left the agency during the Reagan years and attribute that turnover to dissatisfaction with the administration. Second, Reynolds denied, at congressional hearings, that there was any turnover due to protest (Senate Judiciary, 1985). As a result, no data is publicly available on what proportion of those who left the agency resigned in protest.

Nonetheless, there is evidence that of the attorneys who left the agency during the Reagan years, an unprecedented number did so out of frustration with the redirection of policy in their agency. At least 25 attorneys exited the agency at least in part over policy disagreement, compared with zero leaving the agency for this reason during the Carter administration. This number is derived from: a) former members of the agency who were interviewed for this study; b) the signatures on the letter sent to Congress during Reynolds 1985 confirmation hearing; and c) information provided to me by those interviewed in the study regarding other careerists who had left the agency.

Most of those interviewed did not act one-dimensionally and resign solely as a protest. There were other factors (such as personal factors, a chance for early retirement etc.) involved but these other factors alone do not fully explain turnover during the Reagan years. To an extent that, according to those interviewed, was not true during the Nixon years, another administration marked by ideological conflict, both junior and senior career attorneys felt that they had no choice but to leave the Division because they could not, in good conscience, comply with the policy changes they were being asked to bring about (see Aberbach and Rockman on the ideological schism under Nixon). I interviewed eight attorneys who left the Division in the 1980s and all explained their decision to leave as attributable to a mix of factors. But for all but one of them, dissatisfaction with the agency’s policy direction was among those factors. Many of them wrote exit letters to or held exit interviews with Reynolds outlining their disagreements. Others did not because they sought employment elsewhere in the government and were afraid of jeopardizing their careers.

Turnover in some sections was greater than others. In one section, the Special Litigation Section, it almost amounted to a mass exodus. In general, however, the exit was more of a trickle that occurred over the eight years of the Reagan administration precipitated for the most part by a specific case or
incident that served as the catalyst or "the straw that broke the camel's back" for a given individual. In the Special Litigation Section, the section with the most dramatic turnover, by 1984 only one line attorney and the Section Chief remained who had been with the Division before the Reagan era (out of approximately 18). Ten of those attorneys who left this Section submitted a letter to the Senate during Reynolds 1985 confirmation hearing in which they stated; "All of us vigorously opposed Mr. Reynolds narrow views of the rights of institutionalized persons and resigned in part due to that opposition." (Senate Judiciary Hearing, Reynolds hearing, 1985). One of the respondents in this study articulated his reason for leaving this way, "it became impossible to prosecute cases when ideologues were running the Division so I felt that I had no choice but to leave."

Exiting was not taken lightly and was often a last resort. The exit response was higher in the Special Litigation Section in part because the attorneys there were younger and more optimistic about their job prospects outside government and in part because they felt thwarted from actively enforcing the law to a greater extent than those in other sections. Older, more senior attorneys were more concerned about job opportunities. In addition, the lawyers in Special Litigation felt thwarted to a greater extent because agency policy restrictions left them with less work to do. Whereas in, for example, the area of education, attorneys could bring suit with limitations on the remedies they could seek, in Special Litigation, career attorneys found that many of the restrictions limited them from bringing suit at all.

Exit is an uncommon response in part because it is viewed by career bureaucrats and political appointees alike (though not by consumers) as extreme behavior. Its viability as an option is also limited by the confidence of the people involved that they can get employment elsewhere. Nonetheless, quite a few career attorneys at the Civil Rights Division found the situation so extreme that they believed that they had no choice but to leave. They believed that they could not, in good conscience, cooperate in the execution of policies that they viewed as antithetical to the vigorous enforcement of civil rights.

Exit is also limited by the availability of other employment and by the condition observed by Hirschman that "once you have exited, you have lost the opportunity to use voice but not vice versa; in some situations, exit will therefore be a reaction of last resort after voice has failed" (p.37). Those who resigned from the agency were no longer in a position to influence civil rights policy from the inside and gave up the opportunity to influence the decline of their agency in the future. This is why some of the lawyers interviewed chose voice over exit. Many lawyers felt that they could play a
positive role in shaping Reagan's civil rights policy by remaining in the agency. One career supervisor hoped to "help keep the Division on the moderate course it had steered [in the past] through both Republican and Democratic administrations" (Selig 1985). Another related to me that she was committed to seeing civil rights law enforced and felt that the resources of the Justice Department, even under Reagan, enabled her to do so more effectively than she could in a public interest law organization.

**Loyalty**

Loyal behavior can be either the result of policy agreement with political appointees or the belief that loyalty to the president is proper bureaucratic behavior. The former view was inconceivable at the Civil Rights Division. The Civil Rights Division is without question an agency where conservative appointees confronted liberal bureaucrats. There were no conservatives among my seventeen survey respondents and there was only one Republican. Nor were there many indications of policy agreement except in those areas where the Reagan administration did not seek major policy changes. As one attorney characterized it, the overall relationship between careerists and appointees was one where "there was more disagreement than agreement." Nor are there any interview statements which provide evidence of this type of loyalist behavior.

There is considerable evidence for the latter type of loyalist behavior. Most interviewees felt that the Attorney General was their legitimate boss. The attorneys at the Civil Rights Division understood and respected the authority and legitimacy of their political superiors. On the surface, this may seem to conflict with the extensive use of voice discussed earlier. I argue that it does not and that the relevant conditional variable that explained when and where voice rather than loyalty was present is the time of the behavior. Agency lawyers exercised voice at all of the pre-decisional points in the process. They argued for the conduct of an investigation or against a Section 5 voting rights preclearance. But once Reynolds made a decision, that decision was accepted. To pursue the example of Section 5 voting rights objections, once Reynolds said that in spite of staff objections, he was overruling them and preclearing a redistricting plan, the careerists precleared the plan. The same norms that acted as a deterrent to sabotage precipitated loyal behavior at the later stages of decision-making or after Reynolds had edited a pleading to be submitted in court. This finding of the presence of both voice and loyalty is an important one and the explanation that both behaviors can be found at different points in the decision process with respect to the same case or policy also sheds considerable light on the bureaucratic reaction to political control. It will be discussed in more detail below.
It turns out that there is a third type of loyalist behavior, not anticipated in the literature. It involved cooperative behavior based on political expedience and career gain. The best illustration of this involved two attorneys assigned to the same employment discrimination case. An already existing consent decree governing the hiring practices of a municipality's police force was challenged by white employees and a decision had to be made regarding the agency's response. The two line attorneys disagreed over the appropriate response. Most of the attorneys in the section felt that one attorney's response was "shaped by what Brad [Reynolds] wanted" (rather than his understanding of the law) and his was the approach adopted as the agency stance in the case. He was later promoted to Section Chief whereas the other career attorney after being passed over for a number of promotions ultimately left the Division. The other career attorneys felt that the prevailing attorney's stance had been based on political expedience and not out of committed support for the white employees in the case.

Overall, this third type of loyalist behavior based on personal career concerns seems to have been rare in the Civil Rights Division. However, a few career executives cooperated with the appointees in this manner. These career people tended to be high-ranking, generally Section chiefs (one was promoted to section chief as a result of his loyalist behavior). They were not "converted" to the administration's point of view. As I have already reported, CRD attorneys remained overwhelmingly liberal and Democratic, even at the end of the Reagan years. However, a few careerists found it politically expedient to cooperate with their political superiors. They were probably somewhat less zealous in their commitment to civil rights than their peers and more concerned with career gain. Their behavior reveals the possibility that "capture" is a two-way street and that committed appointees can capture career people as well as be captured by them. Having a few loyalists in the career ranks assisted the appointees in their efforts to control the agency.

Neglect

In the Civil Rights Division neglect was rarely the only response pursued by a given individual and it was seen to a greater extent during the later years of the administration than during the earlier years. Initially, according to the interviewees, almost all of their colleagues (themselves included) voiced their objections to the redirection of civil rights policy to Reynolds and his assistants. As time went on, however, the bureaucratic response of some career attorneys shifted from voice to neglect. Respondents referred to those who persevered in fighting the good fight for the duration of the eight years with respect. However, they also described a leveling off of voice behavior and its replacement by neglect. Again, time
turns out to be an important explanatory variable. In the case of explaining the presence of neglect, the relevant units for measuring time are not the point in the decision process but the point in the term of the president.

Neglect took the form of not recommending investigations or suits that would have been recommended prior to 1981 but that under Reynolds were unlikely to be approved. In the early years of Reagan those recommendations would have been made. By the later years, careerists, recognizing the futility of such recommendations did not pursue them. Overall, neglect took the form of less arguing, less activism and fewer initiatives on the part of the careerists.

The comments of the interviewees make it clear that neglect resulted from their getting worn down and tired and adopting a more defeatist attitude. "The problem", according to one Section Chief, "was that the lawyers stopped proposing things because they got discouraged after awhile." A deputy Section Chief noted that "the career people were beaten down and stopped trying as hard." An attorney who ultimately left the Division observed that after awhile it was, "not worth it to break your neck working to prepare lawsuits that they won't file anyway." I do not want to create the impression that the dedicated civil servants at CRD abandoned their commitment to what they viewed as the proper approach to civil rights enforcement. However, as attrition took its toll through exit it was more difficult for those who remained to retain their zeal and diligence, especially as they saw little payoff for their efforts. Traditional political science wisdom makes a great deal of the fact that bureaucrats can simply outlast politicians because politicians come and go (Heclo; Light). In this case, Reagan and Reynolds outlasted many careerists and beat those who remained at their own game of time.

The National Highway Traffic Safety Administration

The National Highway Traffic Safety Administration (NHTSA) was created in 1966 by the National Traffic and Motor Vehicle Safety Act. The agency is headed by a presidentially appointed Administrator who reports to the Secretary of Transportation. It was created in large part as a result of the public outcry over two scandals: the first the dangerous defects in the GM Corvair publicized by Ralph Nader in Unsafe at any Speed, and the second the well-publicized wiretapping and spying conducted by GM against Mr. Nader (Graham). Approaching the 1980s, the agency prided itself on the Ford Pinto recall and the regulations it had instituted regarding auto safety. However, it still reeled from the embarrassment over a regulation it had issued on automatic ignition interlock systems and the subsequent congressional legislative veto of this rule, and from the court's rejection of an early
attempt to issue a passive restraint rule due to the court's holding that the
test dummies were unsatisfactorily specified (Graham; Mashaw and Harfst).

NHTSA implements its statutory mandate through the investigation and
recall of defective automobiles, the issuance of regulations and the
attempted modification of driver behavior. Some have argued that it has
traditionally focused on the former two to the neglect of the latter due to the
composition of the 670-people workforce which is predominately engineers
with smaller numbers of attorneys and even fewer numbers of psychologists,
highway safety management specialists and economists (Pruitt; Lynn).

During the Carter years, NHTSA Administrator and Carter appointee
Joan Claybrook took an activist stance toward regulation and a rather
negative view of the auto industry that the agency regulates. In July 1977,
the agency issued a new passive restraint rule requiring the phase in of
automatic occupant restraints in all new cars by 1982-84.

NHTSA was one of several agencies targeted by the Reagan transition
team for deregulation. Though the President himself did not deal in specific
plans for the agency he expressed his more general plans for both
deregulation and relief aid for the ailing auto industry -- both of which
clearly would affect NHTSA (Weekly Compilation of Presidential Documents;
Wines). In April, 1981, a Reagan commissioned Vice Presidential Task Force
issued its report entitled, Actions to Help the U.S. Auto Industry. This report
singled out the EPA and NHTSA for regulatory review. Many of the careerists
interviewed felt that this report set the tone for presidential policy toward
NHTSA for the duration of Reagan's two terms. That tone was reinforced by
the appointment of Ray Peck, a self-pronounced deregulator and former coal
industry lobbyist as Administrator for the agency. During his short tenure
(though not atypically short for an appointee), he rescinded Claybrook's
passive restraint regulation. The tone was maintained by his replacement,
Diane Steed who came from OMB and was believed by careerists to follow the
President's and Secretary's lead. She served as Administrator from 1983
until the close of the administration.

The administration's efforts at NHTSA focused chiefly on deregulation.
In addition, NHTSA grants-in-aid programs to the states (which deal with e.g.,
driver education, drunk driving) suffered significant budget cuts.
Interviewees felt that the section of the agency responsible for automobile
defects investigation and recalls was not targeted by the Reagan
administration but consumer groups argue that recalls declined dramatically
under Reagan (Center for Auto Safety) and all agree that the approach in
recalls was a much more accommodating one towards the auto industry.
The agency was the object of a number of components of the administrative presidency strategy. It suffered budget cuts and RIFs, was headed by anti-regulation administrators and was initially overseen by an anti-regulation Secretary of Transportation (Drew Lewis) though he was later replaced by the more moderate Elizabeth Dole. OMB also played an active role as NHTSA is a regulatory agency subject to OMB review though its role was largely indirect. OMB was held up as a threat by the political appointees and therefore served as a deterrent to regulatory activity though interviewees reported that it did not actually reject any agency proposals. (For a more extensive discussion of OMB's role at NHTSA see Golden chapter 4).

Both Peck and Steed ran the agency in a way that slowed down productivity without directly challenging the agency's mission. Unlike at the Civil Rights Division, career staff recommendations were rarely rejected outright. Instead Peck and Steed would send proposals back to the lower levels of the agency and request more research without ever directly commenting on the merits of the proposals or vetoeing them. Interviewee comments in this regard are revealing:

"No one ever straight out said deregulation."
"In most cases the decision was long delay but not rejection."
"Everything was researched to death."
"They just called for more research."

An example is illustrative. A proposal for a rule requiring child restraint hooks in the rear seat of automobiles was being considered. The estimated cost was $1 per car. Peck kept sending the proposal back and requesting a hook that could be installed for .97c per car. The engineer who related this story to me added, "Ray never said, 'I just don't want to do it.'" However, his strategy which was continued under Steed, considerably altered the way the office had been run under Claybrook and did so in a manner which careerists found frustrating and demoralizing.

As was the case at the Civil Rights Division, career bureaucrats at NHTSA had considerable provocation for resistance of the type identified by political scientists: budget cuts and RIFs, challenge to their regulatory mission, and OMB intervention. One difference, however, and one which might lead to the expectation of cooperation, was the more mixed ideological and partisan composition of the agency. Career survey respondents were split ideologically with 7 careerists identifying themselves as conservative and 6 as liberal. And while there was only 1 Republican among them, 7 considered themselves Independent of party affiliation (with the remainder Democrats). A second difference is that following the departure of Ray Peck in 1983, interviewees indicated a lessening of career/appointee tensions.
Voice at NHTSA

Voice, and resistance more generally, were limited at NHTSA by two aspects of the way the appointees ran the agency. The first is that decision-making on the air bag issue was done without consultation with the careerists. Initially, Peck made a unilateral decision to rescind the passive restraint (air bag) rule that was in place when the Reagan administration took office. When the Supreme Court overturned Peck's rescission of the air bag rule, the new Transportation Secretary, Elizabeth Dole, took the air bag issue out of the hands of NHTSA and moved it "upstairs" (the careerist term for the Secretary's office). The second factor is the manner, elaborated above, in which the Reagan appointees handled rule-making activity by employing a strategy of slowdown, stalling and requests for more research. These two factors reduced the number of opportunities to pursue the voice option because on a number of issues careerists were excluded from the loop. Nonetheless, as the discussion that follow reveals, there were opportunities where voice was present and others where loyalty and neglect rather than exogenous factors better describe the absence of voice at NHTSA.

Voice by argumentation

Voice by argumentation occurred at NHTSA but was not nearly as common as it was at CRD. Certain NHTSA career officials were critical of Reagan administration policies and expressed both that criticism and their support for air bags, 5 mph bumper standards, higher fuel economy requirements etc. Other careerists were for the most part silent on these issues. There was some concern about reprisals for taking issue with Peck but that concern was obviated when Diane Steed became agency Administrator. Careerists found Steed to be more receptive to career input and in fact to be quite dependent on career expertise.

Where we do see voice, it is within constraints similar to those seen at CRD. Voice was used pre-decisionally. For example, when Peck called careerists into his office on the Sunday he made the decision to rescind the passive restraints rule some careerists took issue with his decision. However, once it was clear that his decision was final careerists did not try to thwart him from proceeding.

A few examples where voice was used are illustrative. Again, in the case of Peck's rescission of the passive restraint rule, an estimated 15 careerists "lobbied" Peck prior to his making the decision. They did not do so collectively and did not all have identical concerns but they expressed their concerns to Peck. Then on the day that Peck met with the top level careerists to announce his decision a few of those careerists angrily disputed his
decision. One of those present told Peck that he thought he was "completely wrong."

There was similar voice in the form of back and forth discussion and lobbying in the case of the automobile bumper standard. Here, by law, NHTSA must issue a standard; the debate was between a 2 or 5 m.p.h. standard. In this case there was no consensus among careerists, in part due to controversies over data. But those with data and opinions presented their cases to Peck fairly aggressively.

Over the course of the eight Reagan years there were a host of other issues involving redirection of agency policy or procedure where barely a peep was heard from the careerists. Careerist profession and the technical nature of their work seem to account, in part, for the relative absence of voice by argumentation at NHTSA. Attorneys and generalists were more likely to use voice than engineers or physical scientists. Engineers frequently commented that the only thing they did not like about their jobs was the "politics." This produced a tendency among them to avoid taking part in disputes that required them to take what they viewed as political stances.

Equally, however, the engineers relied heavily on research and data. They viewed their jobs as the presentation of that data for others to use as the basis for decisions. Moreover, in spite of their extensive research efforts, existing data was often incomplete or inconclusive. The ambiguity of the data often reduced the degree of consensus among careerists. Lacking consensus among themselves, I argue, reduced the likelihood that they would take on the political people.

Collective Action

The only collective action organized by careerists at NHTSA actually occurred after Reagan had left office and was directed not at the political appointees but at an interest group. In 1989, career personnel from the office in NHTSA responsible for the recall of defective automobiles wrote a letter to the Center for Auto Safety, a consumer advocacy organization, chastising the Center for what the careerists argued was unjustified criticism of the agency's recall record during the Reagan years (Brown). The letter, signed by 50 members of the NHTSA career staff, also accused the consumer organization of selling information on defective automobiles, information which the agency asserted was available from the agency for free. (This letter was also leaked to the Washington Post.) The letter did not express any views or opinions concerning appointee/career relations or appointee behavior internal to the organization and may be a better example of loyalty than voice.
Leaks

According to interviewees, leaking has a long tradition at NHTSA. The primary channel for leaks is between junior level engineers within the organization and engineers in the auto industry or at consumer or insurance organizations. The material leaked is generally of a technical nature and the leaks are generally precipitated by the excitement of a technological breakthrough. Their use long predates the Reagan administration.

During the Reagan administration information was also leaked to Congress and to interest groups. In interviews, both careerists and the recipients of the leaked information were vague as to the content of these leaks. When Tim Wirth moved from the House to the Senate and his top aide moved back to Colorado, NHTSA lost its principle advocate in the House. Without a primary recipient for the leaks, fewer leaks occurred, though agency careerists continued to provide information to Senator Danforth. With respect to interest groups, the disdain expressed by many of those interviewed toward the Center for Auto Safety, the leading consumer group concerned with auto safety, (and also expressed in the letter sent to the Center, discussed above), limited the outlets for leaks. Nonetheless, Center for Auto Safety files to which I was granted access do contain documents that appear to have been leaked such as internal agency memoranda written by Peck. Finally, the Center for Auto Safety letter discussed above was leaked to the press.

Overall, leaking did occur at NHTSA and did not seem to have the negative associations attached to leaking at the Civil Rights Division. Leaking seemed to have been limited by the lack of receptive outlets (in Congress, the media and the interest group community) as much as by moral compunction. Nonetheless, nothing in the interviews conducted indicates that leaking was more than an unusual occurrence.

Sabotage

As at CRD careerists at NHTSA did not believe that sabotage was appropriate conduct for a member of the career civil service. Careerists at NHTSA, engineers and attorneys alike, expressed the view that the Administrator was the legitimate decision-maker and that once his or her decisions were made, they were binding. The example of the original decision to rescind the air bag rule by Ray Peck illustrates this principle. Most interviewees were convinced that Peck had acted unilaterally on this decision, disregarding staff advice (though Peck claimed to have read the
entire docket on the subject). Peck made the decision himself on a Sunday. Careerists felt that this was his prerogative. The telling aspect is the comment that consistently followed the recounting of this episode. The gist of the comments was that if Peck had let the careerists write the rescission of the regulation it would not have been dismissed by the Supreme Court as "arbitrary and capricious". If the goal had been sabotage, careerists would have viewed this as an opportunity to weaken the notice of rescission. Instead, their comments indicated a desire to follow the political decision and use their expertise to strengthen that decision.

Exit

There was little use of the exit option as a form of resistance at NHTSA. Some exit of this type did occur at NHTSA but this behavior primarily occurred in anticipation of the new administration and primarily among the legal staff. The majority of exit that occurred did so independently of any protest motivation. It resulted mainly from RIFs or, more frequently, from the fear of RIFs. Fear of RIFs was frequently mentioned by interviewees as a factor that led careerists who believed that their jobs were vulnerable to initiate the search for other employment. For the most part it was junior engineers who felt most vulnerable. Interviewees believed that actual RIFs were a lesser factor in accounting for agency turnover because while there was considerable reshuffling and redefining of positions, few people were actually fired. Those who remained in the agency speculated that the atmosphere created by RIFs had an additional effect on exit in that those whose jobs were secure but who might otherwise have considered leaving NHTSA ruled out such a move due to an increased appreciation of their job security. A final factor limiting the use of exit at NHTSA was the limited availability of alternative job prospects. In an era of deregulation, Detroit was doing less hiring of auto safety engineers. In addition, a few interviewees mentioned that auto safety engineering does not have a large research community in universities and research institutes. In the context of exit, this would further serve to limit the availability of jobs outside the agency. The attorneys in the agency left at a higher rate (though this represents only three or four people) due, in part, to their greater confidence regarding job prospects outside the agency. It is important to note that lawyers did not leave over policy conflicts but more as a result of boredom and malaise caused by the slowdown of agency activity.

Some interviewees expressed surprise that some of the high-ranking officials in their agency who, though careerists, had been closely identified with the Carter/Claybrook administration and pro-regulation advocacy did not exit the agency. While the explanations offered above may explain the lack of exit from this small group, I think a different explanation is necessary for
the more general absence of this response. That explanation is the more pervasive acquiescence of the careerists at NHTSA, their less ideological orientation and their more centrist view (falling somewhere between the Carter and Reagan administrations) of regulation. It is relevant to note that careerists at NHTSA did not seem to exit the agency over policy disputes during the Carter/Claybrook era either although according to careerists many of their colleagues did not "welcome" Claybrook and her aggressive policy views and long hours.5

Loyalty

Almost everyone at NHTSA can be characterized to some extent as a loyalist. Careerists cooperated with the appointees, especially Diane Steed and her special assistant Erika Jones who were well-liked and well-respected. Cooperation stemmed in part from fewer policy disagreements between careerists and appointees than there was at CRD. Careerists at NHTSA were pro-regulation. They believed that their enabling statutes mandated the development of auto safety regulations. "NHTSA careerists have a regulatory orientation" explained one former careerist. In addition, a former NHTSA attorney believed that "careerists wanted more regulation than the Reagan people. They believe in general in the necessity for regulation." However, many civil servants at NHTSA felt that Joan Claybrook had gone too far on the regulatory side, sacrificing thorough research for speed, and were critical of her staunchly anti-auto industry stance. Under Claybrook the careerists had adopted a position of tempering Claybrook (interview). So, at least initially, they were not averse to a change to a slightly slower pace of regulation than what they perceived as Claybrook's extremeness. In addition, as noted earlier, they were more ideologically split than careerists at CRD. Nonetheless, most careerists at NHTSA also found themselves frustrated under Peck and Steed. These careerists were committed to regulation as a necessary part of improving auto safety and interpreted of the agency's mission as including regulatory authority. Greater policy congruence, therefore, does not sufficiently explain loyal behavior.

Instead, most loyalty is better accounted for by the widely shared belief that, as one career engineer put it:

Career staff are here to do the job we're told to do. We try to do our best whether it is regulation or deregulation. We carry it out in the best manner... It's up to the elected officials to decide what they want to do.

This belief cannot be emphasized enough. Throughout the agency's history, the
Administrator (who has always been a political appointee) has been the ultimate decision-maker concerning the issuance of rules and recall decisions. As a result, these have always been considered appropriately "political" decisions. Careerists view them as "political" decisions drawing on the research of the experts but always being made by people in political positions. One NHTSA attorney viewed decisions regarding regulatory proposals to be "matters of judgement" with the Administrator or Secretary as the appropriate judge. The example of writing Peck’s recission announcement discussed in detail above is an excellent illustration of this type of loyalty mentality at NHTSA. This loyalist behavior, however, does not explain the lack of voice by argumentation in the "pre-decisional" stages and the pervasiveness of neglect. These are better explained by other factors discussed elsewhere in the paper such as the agency's history, mix of professions and lack of consensus.

**Neglect**

There was a great deal of acquiesence, apathy and neglect at NHTSA. As one outside observer on the Hill assessed the reaction to Reagan at NHTSA:

> There was a bunker mentality at NHTSA -- a ride out the storm mentality if you know what I mean. Some careerists were fairly docile and cooperative but there were others who were clearly not pleased by the situation but felt powerless to do anything. But I don't think it's fair to say people at NHTSA are more docile than people at EPA. The factors are different.

A number of factors contributed to the prevalence of neglect. One such factor was the looming possibility of RIFs. One mid-level careerist claimed that, "because of RIFs you kept your mouth shut and your head low to keep your job." Attention was focused on job security rather than "the public interest". At NHTSA this factor did not effect careerists at the highest echelons of the career ladder who were not threatened by RIFs but did effect those in middle management who were constantly being shuffled around and reassigned. Another factor that explains neglect among one group of NHTSA careerists, the engineers involved in R6D, is that they actually gained autonomy and discretion during Peck and Steed's tenures. Since Peck and Steed shared the goal of no new regulation, they lacked an agenda for research necessary for developing new regulations and therefore did not communicate any research priorities to the R&D staff. As a result, researchers were "left to their own devices" and "could study whatever they wanted to - anything that interested them." In essence, neglect on the part of this corps of engineers was due to complacency rather than bunker mentality dissatisfaction.
An additional factor contributing to neglect was the lack of consensus among careerists. There were, and always had been, disagreements among the different professions and disputes over the data within professions. Careerists had traditionally debated among themselves and then turned to the Administrator for final decisions (this is institutionalized in the procedure by which draft regulations are circulated). Rather than presenting a united force to the Reagan appointees this internal conduct continued, resulting in an acquiescent response.

Finally, and the factor that best accounts for neglect at NHTSA, the political appointees adopted early on in their tenure and maintained throughout the eight Reagan years, an approach to running the agency which involved slowing down the rule-developing machine by increased research and data requirements. "Under Reagan, decisions just were not made but were sent back to generate more information. Things were left hanging" (interview). Careerists characterized this atmosphere as demoralizing and I argue that that demoralization led to a loss of energy and enthusiasm on their part. One career supervisor hinted at this when he commented that, "morale went down because our work wasn't going anywhere." Many careerists contrasted this with the excitement generated by Joan Claybrook who inspired long hours and hard work and some contrasted it with the current Administrator Jerry Curry who has provided careerists with specific goals complete with timetables.

Inter-agency Comparisons

Career attorneys in the Civil Rights Division engaged in vociferous voice activity during the Reagan years, while at NHTSA the voices of the career engineers and attorneys were more muted. There was also considerably greater use of exit at CRD than at NHTSA. On the other hand, there was more loyalty and neglect at NHTSA than at CRD though both these behaviors were also reported at CRD. In short, there was considerably more resistance on the part of civil servants at the Civil Rights Division than there was at NHTSA. Why were careerists at the Civil Rights Division so much more resistant at the Civil Rights Division during the Reagan administration than careerists at NHTSA? And more generally, why isn't the degree of resistance uniform across agencies? The explanation draws upon the importance of organizational context. As discussed earlier, the two agencies varied on a number of different dimensions, five of which will be discussed here: ideology, profession, esprit, agency history and confidence.

Ideology

We have already seen that the Civil Rights Division was heavily
populated with liberals and lacked many career Republicans, whereas the partisan and ideological composition of NHTSA was more mixed. In addition to measuring ideological beliefs directly, interviewees were asked why they joined their respective agencies. The modal response for joining at NHTSA was being a "car nut" whereas at CRD answers usually pertained to a commitment to civil rights or a desire to do public interest law. NHTSA was described by one career attorney as an agency that doesn't attract "crusaders" but that instead has a "safety mentality." The differences in attraction to the agency also reveal a greater ideological commitment at the Civil Rights Division.

**Profession**

In a previous paper, Golden argues that attorneys may be more inclined to use the voice option than scientists or technicians because of their professional training and norms and because the day to day work of attorneys entails arguing, rebutting and counter-arguing (Golden, 1990). This possibility is borne out here. Attorneys at Civil Rights seemed more "comfortable" arguing constantly and forcefully than did careerists at NHTSA. In addition, of those who did exercise voice at NHTSA, most were attorneys, and one, while not an attorney was a generalist. Few of those exercising voice at NHTSA were engineers. The engineering, physical science and economic professionals at NHTSA seemed more "comfortable" presenting research evidence and data, presenting both sides of an issue and leaving decision-making to others.

**Esprit**

All but one of the interviewees at the Civil Rights Division characterized the agency as having a strong esprit de corps. Only one of the interviewees at NHTSA felt this way. The reasons for the strong sense of esprit at CRD are readily apparent; all share a strong sense of commitment to the active pursuit of civil rights. In addition, many interviewees referred to the intense bonding experience that occurs from spending months "on the road" with two or three other attorneys during the trial portion of cases. The lack of esprit at NHTSA is more difficult to understand since everyone I spoke with seemed quite collegial and spoke of their career colleagues in friendly and respectful terms. Part of the explanation seems to stem from agency history and historical divisions among careerists over policy. These divisions are abetted by the internal agency review process which circulates drafts to each office for comments thus pitting groups of careerists against each other, and by the multiplicity of professions in the agency. In addition, culturally, the agency is not a crusading agency although Claybrook tried to
instill the agency with a crusading spirit. It is also important to note that although the agency with the high sense of comraderie was the more resistant, even in that agency, few voice activities were collective in nature.

Agency history

The history of NHTSA prior to Reagan has been mired by a two-decade long debate over air bags and the automatic ignition interlock and test dummy fiascos. By contrast, the Civil Rights Division entered the 1980s with an almost impeccable record in court. The experiences at CRD have resulted in careerists viewing their agency as engaging in precedent-setting work that over the two decades preceding 1981 had established the existing body of civil rights case law. The precedents and case law that the Reagan administration sought to challenge were the precedents and case law established by the CRD career attorneys.

Confidence

This combination of historical experiences and agency esprit result in what I call careerist “confidence”. By this term, I mean that careerists at CRD shared a set of factors that gave them the confidence to challenge the executive branch political leadership. By contrast, the lesson learned by NHTSA careerists from their setbacks and the uncertainty of the external response by the courts and Congress to their actions (as well as the competing demands of auto industry and consumer advocacy interest groups) was to move cautiously. Careerists found themselves caught between the zealotry of Claybrook, whom they had tried to “temper” and the slowdown of the Reagan appointees. They lacked the confidence to resist and instead opted for the more cautious path. In this case, the cautious path was one of a mixture of loyalty and neglect.

All five of these factors appear to have contributed to resistance at CRD and neglect at NHTSA. They imply that bureaucratic behavior is shaped in considerable part and in predictable ways by the backgrounds brought to agencies by those who people them and by the experiences they share during their service in the agencies. This highlights the significance of the American civil service system where, even with the advent of the SES, civil servants are likely to spend their entire career in the same agency

Conclusions

With the usual caution about generalizing from two cases, the findings presented here provide evidence of both resistance and cooperation. In the two agencies examined, we have found a variety of responses to the Reagan
administration's effort to use administrative tools to reshape policy. We have found considerable use of voice but in the limited context of arguing with the appointees prior to the point of decision-making. We have seen some use of exit in one agency. We have seen considerable loyalty after the point of decision in both agencies. And we have seen some neglect, especially after the initial transition years as the agencies settled down to eight years of waiting for a new administration.

However, although the use of exit, voice, loyalty and neglect varied between agencies, one similarity warrants attention because of the light that it sheds on the outer bounds of resistance. Within each agency, the use of voice as a response to Reagan was limited. It was limited almost exclusively to voice by argumentation. It was constrained to a limited time in the policymaking process. Bureaucrats seem willing to argue with appointees prior to the point of decision-making. However, in both agencies careerists seemed to accept the authority of politically appointed officials to have the final say once careerists exercised their voice. While this behavior is not the strict neutral competence envisioned by adherents of the politics/administration dichotomy, it is also not the intransigent, insubordinate behavior feared by politicians (Neustadt; Pious; Rourke). Instead it seems to suggest a model which is adversarial in that divergent views are likely when presidential administrations seek policy change and in that careerists are active in voicing their opinions but it is also cooperative in that disagreements are limited to a pre-decisional time frame and sabotage is uncommon. The two cases examined here are both agencies that are small, centralized in Washington, DC and lack vast implementation networks. Further research is needed in a larger agency with more employees in the field and more discretion in implementation where there might be more room for sabotage at the lower levels or field offices before these apparent pre-decisional, anti-sabotage limits to resistance can be generalized.

In addition, certain patterns emerged from the differential use of exit, voice, loyalty and neglect in the two agencies. These patterns led to the identification of five factors: ideology, profession, agency esprit, agency history and careerist confidence (discussed more fully in the preceding section), that can be used to explain where and why resistance, in the guise of exit and voice, will occur.

Nonetheless, although this paper has begun to explore bureaucratic resistance and cooperation to the presidency in the context of bureaucratic use of exit, voice, loyalty and neglect, it has focused primarily on describing these bureaucratic behavior and accounting for their presence or absence. Yet part of what makes the presence of exit and voice of interest is their effectiveness vis-à-vis the presidency. Further research is needed to address
the questions: Do exit and voice matter? and, Does resistance influence agency outcomes? In order for bureaucratic voice and exit to be effective they must be seen and heard. If career civil servants shout but nobody listens, their effectiveness will be severely limited, and moreover, this is likely to affect their strategy of using exit and voice in future disagreements with their political principals in the executive branch.
Notes

The author wishes to thank the civil servants interviewed for this study for their cooperation.

1 During transition periods, however, a career attorney has often filled the role of Acting Assistant Attorney General.

2 The question wording used on the questionnaire was: "If you had to choose one word or phrase to describe your political beliefs, which of the following would you choose?" The party identification question was phrased: "Generally speaking, do you usually think of yourself as a Republican, a Democrat an Independent, or what?"

3 It is possible that those interviewed either deliberately deceived me or were not as frank as they could have been. I attempted to avoid this problem by interviewing former as well as current personnel who should have no reason to be guarded in their responses. In addition, in reviewing my interview transcripts, a coder concurred with my assessment that all respondents, current and former, seemed to be frank throughout the interview. Reagan appointees will be interviewed in the future and questions about sabotage behavior will be included in these interviews.

4 The total N is 13.

5 See the footnote numbered 2.

6 In Retreat from Safety, Joan Claybrook claims that considerable expertise was lost at NHTSA due to the exodus of specialist engineers but I did not find support for her claim in the interviews conducted for this study. I tried to interview Ms. Claybrook in part to confirm her claims regarding agency turnover and to request the data cited in her book but while she consented to an interview she repeatedly cancelled our appointments.

7 Self-identified ideological belief does not indicate policy preferences on specific issues but I am confident that this group of highly educated elite respondents are highly constrained in their belief systems. Questions on policy issues were not used because in pre-tests respondents complained that multiple choice questions were too simplistic.

8 Difference is not attributable to lack of understanding of the meaning of esprit. Nothing in the interviews indicated a problem. Question wording: "Do you think that NHTSA/The Civil Rights Division has a particular culture (like a "corporate" or organizational culture) or esprit de corps?"
REFERENCES


Golden, Marissa Martino. "Presidential Control and Bureaucratic Responsiveness during the Reagan Administration." Diss. University of
California, Berkeley, in progress.


Ingraham, Patricia and Carolyn Ban. "Models of Public Management: are they useful to federal managers in the 1980s?" Public Administration Review. 46 (March/April 1986).


________. "Bureaucracy in the American Constitutional Order." *Political Science Quarterly*. 102 (Summer 1987).


Wines, Michael. "Administration says it merely seeks a better way to enforce civil rights." National Journal (March 27, 1982).


IGS Working Papers

$3.50 each plus 20% for shipping and handling, tax where applicable

1991

91-18 Exit, Voice and Loyalty: Bureaucratic Responses to Presidential Control During the Reagan Administration Marissa Martino Golden

91-17 Democracy and Self-Organization: The Systemic Foundation for the Democratic Party Gus diZerega

91-16 The Myth of the Independent Voter Raymond E. Wolfinger

91-15 Bureaucratic Responses to the Administrative Presidency: The Civil Rights Division Under Reagan Marissa Martino Golden

91-14 The Emergence of Strong Leadership in the 1980's House of Representatives Barbara Sinclair


91-12 Elites and Democratic Theory: Insights From the Self-Organizing Model Gus diZerega

91-11 Indispensable Framework or Just Another Ideology? The Prisoner's Dilemma as an Anti-Hierarchical Game Aaron Wildavsky

91-10 Intra-Party Preferences, Heterogeneity, and the Origins of the Modern Congress: Progressive Reformers in the House and Senate, 1890-1920 David W. Brady

91-9 The Information-Seeking Behavior of Local Government Officials Marc A. Levin

91-8 Working in Practice But Not in Theory: Theoretical Challenges of “High-Reliability Organizations” Todd R. LaPorte, and Paula M. Consolini

91-7 Pork and Votes: The Effect of Military Base Closings on the Vote in Ensuing Congressional Elections David Hadwiger

91-6 Designing an Interactive, Intelligent, Spatial Information System for International Disaster Assistance Louise K. Comfort

91-5 Constitutional Mischief: What's Wrong with Term Limitations Nelson W. Polsby

91-4 Thermidor in Land Use Control? Paul van Seters

91-3 Parchment Barriers and the Politics of Rights Jack N. Rakove


91-1 The Revision of California's Constitution: A Brief Summary Eugene C. Lee

1990

90-34 Recent Developments in Disease Prevention/Health Promotion in the Federal Republic of Germany, Rolf Rosenbrock

90-33 Recent Developments and Reform Proposals in the Politics of Pharmaceutical Supply in the Federal Republic of Germany, Rolf Rosenbrock

90-32 Speech Before the Meeting of Texas Public Interest Organizations, David Cohen

90-31 A Curious Life—The Pursuit of an Understanding of Public Administration, James W. Fesler

90-30 The Cultural Conquest of the Presidency: Incorporation and the Transformation of American Political Life, 1890-1916, Peter Schwartz

90-29 The Fat Lady Has Not Yet Sung: Is the Tax Revolt Over? Randy H. Hamilton

90-28 A Tightrope Walk Between Two Spheres of Logic: Observations—and Self-Observations—of a Social Scientist in Parliamentary Politics, Rolf Rosenbrock

90-27 Iran Air Flight 655 and the USS Vincennes: Complex, Large-Scale Military Systems and the Failure of Control, Gene I. Rochlin

90-26 Political Leadership and Value Change: Reagan, Thatcher and the Conservative Revolution? Pippa Norris


90-24 Political Cultures, Michael Thompson, Richard Ellis, and Aaron Wildavsky

90-22 The San Jose Metropolitan Area: A Region in Transition, Donald N. Rothblatt

90-21 The Demand for Referendums in West Germany “Bringing The People Back In?” Wolfgang Luthardt

90-20 Sunset As Oversight: Establishing Realistic Objectives, Cynthia Opheim, Landon Curry, and Pat Shields

90-19 Government Expenditure Levels: Alternative Procedures for Computing Measures, Brian Stipak

90-18 Transformation of American Liberalism, 1940s-1980s: An Analysis of Liberal Policy Change and the ADA, Ichiro Sunada

90-17 The Politics of Policy: “Political Think Tanks” and Their Makers in the U.S.-Institutional Environment, Winand Gellner

90-16 CAUTION: Excessive Use of Government Statistics May be Injurious to the Health of the Body Politic, Randy H. Hamilton

90-15 Thermidor In Land Use Control? Paul van Seters

90-14 Taxation For a Strong and Virtuous Republic: A Bicentennial Retrospective, W. Elliot Brownlee

90-13 How the Cases You Choose Affect the Answers You Get: Selection Bias in Comparative Politics, Barbara Geddes

90-12 Counterfactuals and Hypothesis Testing in Political Science, James D. Fearon

90-11 Pat Crashes The Party: Reform, Republicans, and Robertson, Duane M. Oldfield

90-10 The Acquisition of Partisanship by Latinos and Asian-Americans: Immigrants and Native-Born Citizens, Bruce E. Cain, D. Roderick Kiewiet, and Carole J. Uhlane

90-9 New Perspective on the Comparative Method, David Collier

90-8 California Agency Reconnaissance Project: Teaching Public Administration Through Field Research, Todd R. La Porte and David Hadwiger

90-7 Earthquake Safety For New Structures: A Comprehensive Approach, Stanley Scott

90-6 Government Policies And Higher Education: a Comparison of Britain and the United States 1630 to 1860, Sheldon Rothblatt and Martin Trow

90-5 Dominance and Attention: Images of Leaders in German, French, and American TV News, Roger D. Masters, Siegfried Frey, and Gary Bente

90-4 Nonverbal Behavior and Leadership: Emotion and Cognition in Political Information Processing, Roger D. Masters and Denis G. Sullivan

90-3 The Dredging Dilemma: How Not to Balance Economic Development and Environmental Protection, Robert A. Kagan

90-2 Turning Conflict Into Cooperation: Organizational Designs for Community Response in Disaster, Louise K. Comfort

90-1 The Effect of Campaign Spending, Turnout, and Dropoff on Local Ballot Measure Outcomes and The Initiative and California's Slow Growth Movement, David Hadwiger

1989

89-27 On Campaign Finance Reform: The Root of All Evil is Deeply Rooted, Daniel Hays Lowenstein

89-26 Toward A Dispersed Electrical System: Challenges to the Grid, Jane Summerton and Ted K. Bradshaw

89-25 Top Bureaucrats and the Distribution of Influence in Reagan's Executive Branch, Steven D. Stehr


89-23 Learning From Risk: Organizational Interaction Following the Armenian Earthquakes, Louise K. Comfort

89-22 The Elusiveness of Rural Development Theory and Practice: Domestic and Third World Perspectives Joined, Ted K. Bradshaw

89-21 Saints and Cardinals in Appropriations Subcommittees: Academic Pork Barreling and Distributive Politics in an Era of Reistributive Budgeting, James D. Savage
89-20 The Case for Experiential Knowledge, Gene I. Rochlin

89-19 Choice vs. Control: Increasing Organizational Effectiveness in Interdependent Environments, Louise K. Comfort and Keun Namkoong

89-18 Bingo! An Untapped Revenue for California Cities, William B. Rumford, Jr. and Randy H. Hamilton

89-17 The Research on Higher Education Program: An Appreciation of Eskil Bjorklund, Martin Trow

89-16 Santa Cruz County Planning Issues: Papers on Planning, Housing And Forestry, Edward J. Blakely and Ted K. Bradshaw

89-15 Why Pretend One Size Fits All: An Examination of Management Issues That Concern Small Federal Agencies, Randy H. Hamilton

89-14 Music of the Squares, a Lifetime of Study of Public Administration, Herbert Kaufman


89-10 Ernst Fraenkel Lecture, Free University of Berlin the American Election of 1988: Outcome, Process and Aftermath, Nelson W. Polsby

89-9 The Ambiguous Status of Science and Technology in Australia, Anthony Pecotich and Kelvin Willoughby

89-8 1992, European Integration and The Times, David Morgan

89-7 American Higher Education: "Exceptional" or Just Different? Martin Trow

89-6 American Higher Education: Past, Present and Future, Martin Trow


89-4 London 2001, Peter Hall

89-3 The University of London: An American Perspective, Eugene C. Lee, Frank M. Bowen

89-2 Ukiah, 1904: A Modest Footnote to the History of the Council-Manager Form of Municipal Government in the United States, Randy H. Hamilton

89-1 American Identity and the Politics of Ethnic Change, Jack Citrin, Beth Reingold, Donald P. Green

1988

88-27 Locality and Custom: Non-Aboriginal Claims to Customary Usufructuary Rights as a Source of Rural Protest, Louise Fortmann

88-26 Bruce Keith's Almanac: Patterns of Voting in California, Bruce Keith

88-25 Cold Turkeys and Task Force: Pursuing High Reliability in California's Central Valley, Todd R. La Porte and Ted Lasher

88-24 Environmental Ethics in California, Carolyn Merchant

88-23 Crisis as Opportunity: Designing Networks of Organizational Action in Disaster Environments, Louise K. Comfort

88-22 The Logic of Uncertainty: Interorganizational Coordination in International Disaster Assistance, Louise K. Comfort

88-21 Information Networks in International Disaster Assistance, Louise K. Comfort

88-20 The Decay of Federal Theory, S. Rufus Davis

88-19 Inside Japan's Leviathan Decision-Making in the Government Bureaucracy, Brian Woodall and Nobuhiro Hiwatari


88-17 From Crisis to Community: The 1988 Oil Spill in the Pittsburgh Metropolitan Region, Louise Comfort, Joel Abrams, John Camillus, and Edmund Ricci et al.

88-16 The Arrogance of Optimism, Martin Landau, Donald Chisholm

88-15 American Democracy in World Perspective and What to Do About It, Nelson W. Polsby
88-14 Modernization of the U.S. Senate, Nelson W. Polsby

88-13 The Iowa Caucuses in a Front-Loaded System: A Few Historical Lessons, Nelson W. Polsby

88-12 The Reagan Presidency After Seven Years, Eugene C. Lee (moderator)

88-11 The United States Air Traffic System: Increasing Reliability in the Midst of Rapid Growth, Todd La Porte

88-10 Issues in Rural and Small Development, Case Study: Watsonville, Santa Cruz County California, Trish Ramos, Lakshmi Srinivas, Miriam Chion, Ana Lopez, Harry Hecht, Chris Broughton, Robert Murray

88-9 White Reactions to Black Candidates: When Does Race Matter? Jack Citrin, Donald Philip Green, David O. Sears

88-8 Are Chicanos Assimilating? Jorge Chapa

88-7 California Agency Reconnaissance Project Reports, Todd R. La Porte, David Hadwiger, Steven Stehr

88-6 Do You Have To Be Crazy To Do This Job? Causes and Consequences of Job Satisfaction Among Local Legislators, Edward L. Lascher, Jr.

88-5 American All-Mail Balloting: A Summation of a Decade's Experience, Randy H. Hamilton

88-4 Corporate Campaign Spending and Initiative Outcomes in California, Tom E. Thomas

88-3 Research Applications: Perspectives on the California Seismic Safety Commission, Stanley Scott

88-2 Earthquake Engineering and Public Policy: Key Strategies for Seismic Policy, Stanley Scott

88-1 What Do Decision Models Tell Us About Information Use? Evert A. Lindquist

1987

87-7 The Politics of the AIDS Vaccine or How the California Legislature Searched for the Magic Bullet—And Wound Up Squabbling With the Trial Lawyers, the Budget-Cutters, and the Alzheimer's Establishment, David L. Kirp and Hugh Maher

87-6 The Reagan Presidency After Six Years, Eugene C. Lee (moderator)
SEND ORDER TO:
Institute of Governmental Studies
102 Moses Hall
University of California
Berkeley, CA 94720
(415) 642-5537

PLEASE PRE-PAY ALL ORDERS
UNDER $30: checks payable to The Regents of the University of California.
SALES TAX: California residents add sales tax.
HANDLING AND SHIPPING: add 20% of sales price. Allow 4 weeks for delivery.

<table>
<thead>
<tr>
<th>QUANTITY/COST</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Please add my name to the PAR mailing list (free).

<table>
<thead>
<tr>
<th>TITLE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SUBTOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SALES TAX</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HANDLING (20%)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ADDRESS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CITY</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>STATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ZIP</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>