**Critical Issues Commentary**

**A BIBLICALLY BASED COMMENTARY ON ISSUES THAT IMPACT YOU**

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**“PERFORMANCE ORIENTATION”**

**DO OUR ACTIONS MATTER?**

**By Bob DeWaay**

“And let us not lose heart in doing good, for in due time we shall reap if we do not grow weary.” (Galatians 6:9)

The last two months we have examined the issue of Self-esteem. A related matter that bears directly upon this question is that of behavior or performance. Because many teach that high self-esteem is an important prerequisite for personal and spiritual well-being, they see the need to separate self-esteem from performance. If one has to do well to feel good about “self,” then there is a danger that many will feel badly. Feeling badly for any reason is anathema to the feel good generation.

Many assert that “performance orientation” is the culprit behind various persistent behavioral and psychological problems. They claim that one must experience unconditional love from “self” and others in order to become a better person. The key to this experience is to remove performance as any criterion for judgment. Some in the educational system have instituted student evaluation that does not use traditional grading systems so that no student feels badly about his or her performance. Some parents have removed all “shaming” language from their vocabulary so that their children never feel badly about their behavior. Some shun saying “no” or bringing corrective discipline, believing that providing an unconditionally loving environment will cause the natural goodness in their children to come to the surface and overcome the negative forces that might influence them.

This approach has been adopted by some Christians in their therapies and theologies. They claim that reference to standards of behavior, expectation of performance, or codes of conduct will psychologically damage Christians (some call it “abuse”) and is tantamount to legalism. Christians are to be loved “unconditionally” and taught the unconditional love of God that always accepts them as they are and never places performance expectations upon them. The hope is that this unconditionally loving environment will cause Christians to do naturally the right things even if they are never asked to. This goes for sanctification and salvation - no conditions or expectations are attached to the call of God. The purpose of this month’s commentary is to show that the popular “performance orientation” teaching is not compatible with important, Biblical doctrines.

**SIN AND PERFORMANCE**

Before going any further, I want to make clear the Biblical teaching on salvation, “...For by grace you have been saved through faith; and that not of yourselves, it is the gift of God” (Ephesians 2:8). There are no meritorious works one can perform to earn salvation. “For all have sinned and fall short of the glory of God” (Romans 3:23). There is, I believe, a big jump from this truth to the notion that one’s performance is inconsequential or should have (if we had an ideal situation) no influence on his relationships. Do one’s actions really have no effect on his relationship with God or others? The promoters of the “performance orientation” theory will quickly say that they do not approve of heinous, evil acts. What they claim is that the needed change of behavior will come only after one experiences unconditional acceptance, not only from God, but from other significant people such as family and Christian friends.

Many who hold to this theory claim that people do evil because they were raised in a performance oriented society. If the resultant performance orientation is not changed, the person will not change no matter what legal or moral restraints are placed upon them. Accordingly, if people were given unconditional love and acceptance in an environment that placed no restraints or expectations upon them, their natural goodness would cause them to do the right things.

This approach creates a significant dilemma. How does one determine what the “right things” are without acknowledging a changeless standard and thus risking that people will become aware of their shortcomings and and fall into the dreaded state of feeling badly? Removing all standards of behavior is very difficult since even the God-given conscience (Romans 2:14, 15) “accuses” those who transgress it.

One could resolve this dilemma by recognizing no standard and declaring every action, no matter how destructive, to be valid. This would seem rather foolish or callous so increasingly loose “standards” (like prohibiting murder and mayhem) are retained but the blame shifted from the perpetrator to somewhere else (like “society”). Thus even those who do evil need not feel badly about “self.”

However, the Bible teaches that our actions are significant. Sin in all of its forms is condemned and those who engage in sinful acts are held accountable. “For the wrath of God is revealed from heaven against all ungodliness and unrighteousness of men, who suppress the truth in unrighteousness, because that...”
which is known about God is evident within them; for God made it evident to them. For since the creation of the world His invisible attributes, His eternal power and divine nature, have been clearly seen, being understood through what has been made, so that they are without excuse” (Romans 1:18-20). Moral relativism and blame shifting do not change the fact of moral accountability nor the abiding legitimacy of God’s moral law.

A major problem with the modern, psychological, “performance orientation” theory is that it cannot account for original sin. Adam and Eve lived in a perfect environment and were experiencing love and acceptance from God. Their rebellion cannot be accounted for by the idea that they were reacting to “shaming messages” from family and society. Selfishness (the desire to exalt self to “godhood”) was behind the Serpent’s temptaion, not low self-esteem and the psychological malady called “performance orientation.”

**CLARIFYING “UNCONDITIONAL”**

God told them that the day they ate of the tree of the knowledge of good and evil they would die. The condition He placed on their right standing with Him and their blessed estate in His creation was that they refrain from transgressing this one law. The assertion that being in a perfect environment and were experiencing love and acceptance from God had the idea that continuance in sin would help grace abound. He reacts, “may it never be,” (Romans 6:1) a phrase he reserves for expressing the greatest possible repulsion. If there were no conditions involved in our relationship with God, then the death of Christ for our sins would have been unnecessary since He died to fulfill the conditions required by God’s justice. “For Christ also died for sins once for all, the just for the unjust, in order that He might bring us to God” (1 Peter 3:18).

When Christ died for us, the conditions that God, who cannot lie, placed upon man were fulfilled. He died a substitutionary death so that justice and justification of sinners could coexist. Paul wrote, “For the demonstration, I say, of His righteousness at the present time, that He might be just and the justifier of the one who has faith in Jesus” (Romans 3:26). Even here there is a qualifier, “the one who has faith in Jesus Christ.” There are a number of conditions involved in the process of salvation, but boasting on our part is excluded (Romans 3:27).

Salvation that is not based on our meritorious works is different from the concept of unconditional love. Since God is love (1 John 4:8) it can be said that God loves all people, including lost sinners (John 3:16). Because the Bible does not teach universalism (that all people are saved) clearly many people who are loved by God in the most general sense are headed for eternal perdition. Having been loved “unconditionally,” if this is how one defines it, has not solved man’s greatest problem - spiritual and eternal death.

The doctrine of unconditional election is unlike the current psychological teaching of unconditional love. Unconditional election means that there was nothing in us that commended us to God. This idea is found in the Old and New Testaments:

For you are a holy people to the Lord your God; the Lord your God has chosen you to be a people for His own possession out of all the peoples who are on the face of the earth. The Lord did not set His love on you nor choose you because you were more in number than any of the peoples, for you were the fewest of all peoples, but because the Lord loved you and kept the oath which He swore to your forefathers, the Lord brought you out by a mighty hand, and redeemed you from the house of slavery, from the hand of Pharaoh king of Egypt. (Deuteronomy 7:6-8)

God’s choice of Israel was not based on what they had to offer God, but on His sovereign, covenant keeping love. Paul’s teaching is similar:

For consider your calling, brethren, that there were not many wise according to the flesh, not many mighty, not many noble; but God has chosen the foolish things of the world to shame the wise, and God has chosen the weak things of the world to shame the things which are strong, and the base things of the world and the despised, God has chosen, the things that are not, that He might nullify the things that are, that no man should boast before God. But by His doing you are in Christ Jesus, who became to us wisdom from God, and righteousness and sanctification, and redemption. (1 Corinthians 1:26-30)

We cannot claim that God chose us because there was some condition in us that obligated Him to.

**ARE THERE ANY CONDITIONS TO SALVATION?**

However, this does not equal the universalist claim that salvation is totally unconditional. Universalism denies that one must confess Christ as Lord, believe that God raised Him from the dead, and repent (turn from serving self to serving God) to be saved. These are all conditions that are based on the sinner acknowledging his inability to please God by his own efforts and believing
that Jesus the Messiah fulfilled the conditions for salvation. By eternal decree and by His divine nature Jesus is Lord. Refusing to acknowledge, confess, and submit to the Lord is to stay in the state of spiritual death, headed for eternal destruction.

What is “unconditional” is God’s eternal decree, not the parameters of our lives as Christians. Paul called for the expulsion from fellowship of one who was unrepentantly involved in incest (1Corinthians 5). He placed a condition upon that person’s fellowship and acceptance in the church. What he had said in chapter 1 (quoted above) clearly did not imply “unconditional” in the sense that modern psycho-theology uses the term. Paul did not ask whether the abuser in question had been himself abused as a child so that blame could be shifted, he said

-But actually, I wrote you not to associate with any so-called brother if he should be an immoral person, or covetous, or an idolater, or a reviler, or a drunkard, or a swindler—not even to eat with such a one. For what have I to do with judging outsiders? Do you not judge those who are within the church? But those who are outside, God judges. Remove the wicked man from among yourselves. (1Corinthians 5:11-13)

Certain actions (such as incest) should not be tolerated for any reason. No one has a right to sin abusively and demand to be “unconditionally” accepted. Also, people who have been loved and accepted sometimes engage in evil (like Adam and Eve).

**THE SOURCE OF PERFORMANCE ORIENTATION TEACHING**

A persistent problem that has developed since many have sought to integrate modern psychology with Biblical teaching is the use of psychological terms that may not have the same meanings as the Biblical concepts being described. Substituting “performance orientation” for the Biblical warnings against seeking salvation through works is an example of this. Paul Brownback has a chapter in his book, *The Danger of Self Love*, entitled “The Self-Theory of Carl Rogers” in which he shows that the theories of this secular psychological practitioner are behind many now popular self-help theories. Brownback explains Rogers’ theory:

Rogers sees the individual as a missile that has an internal guidance system taking it to its destination. The system is perfectly designed to do its job, but for some unknown reason it has also been equipped with an override capability that can be controlled by someone on the ground. Now the person on the ground does not really have the capability of hitting the target that the internal guidance system does . . . As with the missile, the problem for the person begins when acceptance is given on a conditional basis by significant others. The person then can accept himself only if he meets those conditions. So he stops taking his direction from his self-actualizing tendency (his internal guidance system) and begins following the conditions established by others.

Conditional acceptance is seen as the problem and unconditional acceptance as the solution in the “non-directive” approach to counseling. The answers innately lie within each of us and the problems are caused by external directives. It is not hard to see what this will do to Biblical morals, law, and guidance. It will accuse those parents, for example, who raise their children by Christian standards of being the cause of evil through having placed external directives upon their children, overridden their internal guidance systems, and thereby caused psychological harm.

Brownback explains Rogers’ process, “Beginning with the self-actualizing tendency he displays the same humanism, relativism, and existential tendencies that we found in Fromm, only developed more fully. The heart of his theory is that I know what is best for me. No one else does, and no one should try to tell me or influence me.” Brownback disputes the notion “that unconditional acceptance leads to fulfillment” and laments that evangelicals have adopted these speculations “into their own thinking.” I concur with Dr. Brownback on this matter - Biblical teaching is incompatible with the idea that man has within himself the answers and direction he needs. “I know, O Lord, that a man’s way is not in himself; nor is it in a man who walks to direct his steps” (Jeremiah 10:23).

The performance orientation theory effectively says that man’s problem is not sin, it is that he feels badly and unaccepted because outside influences show him his sin. This certainly does not fit well with God’s counsel to Cain: “Then the Lord said to Cain, ‘Why are you angry? And why has your countenance fallen? If you do well, will not your countenance be lifted up? And if you do not do well, sin is crouching at the door; and its desire is for you, but you must master it’” (Genesis 4:6,7). Where is “unconditional” acceptance in this directive?

The Bible says that we often do not feel badly enough about our condition. “Were they ashamed because of the abomination they had done? They certainly were not ashamed, And they did not know how to blush; therefore they shall fall among those who fall; At the time of their punishment they shall be brought down,’ Declares the Lord” (Jeremiah 8:12). The reason that Biblical teaching cannot be integrated with the unconditional acceptance and self-actualization theories of secular psychology is that it presents a completely different view of the nature of man. If humans are innately sinful as the Bible teaches then nothing could be more futile that trying to combine that idea with Rogers’ theory of a perfect, internal self-guidance mechanism. This is like trying to mix oil and water.

**SHAME BASED THEORY**

A similar theory sees “shaming messages” from parents and others as the cause of human problems. Some suggest that the evangelical church (as it was before the self-esteem reformation) is
the major culprit in causing psychological damage through making people feel ashamed of themselves. Like the unconditional love idea, it is supposed that people do badly because they are trying to “live up” to other people’s expectations. When they do not “measure up” (part of the title of a recent book that relies heavily on the notion of shame) to the demands of the performance-oriented people around them, people act out in wrong ways. Supposedly they either try futilely to be perfect or simply live blatantly evil lifestyles because they have decided they cannot measure up no matter how hard they try.

Though it is true that people can be wrongly manipulated by the expectations of others (as some were by the Pharisees - Matthew 23:4), it does not follow that man’s basic problem is the feeling of shame or the fact of living in a performance-oriented, “shame based” environment. I assert that the problem is the fact of missing God’s mark (the meaning of the Biblical words for sin) and the futile attempts to solve that problem through self-help rather than repentance, faith, and humble dependence on God.

The Bible rebukes people for not feeling ashamed, (Jeremiah 8:12, previously quoted). Paul writes, “Become sober-minded as you ought, and stop sinning; for some have no knowledge of God. I speak this to your shame” (1Corinthians 15:34). Clearly there are times when one ought to be ashamed. We are given no assurance that if we persistently rebel against God and His moral directives that we will not feel ashamed! One can have a “seared conscience” (1Timothy 4:2), but this is not good. If one becomes so calloused to sin that he no longer feels badly about it, or redefines sin so that he feels justified in it, he has not removed the problem nor has he given himself a basis for living a happy, fulfilled life.

When I first encountered the performance orientation teaching in the late 1970’s, I noticed how its promoters defined us all as potential clients. If someone always showed up on time, cheerfully gave of their time and money, and consistently tried to do what was expected of him or her, that person was obviously “performance oriented.” People like that were regarded as “Marthas” who run about doing good - they needed help. If someone else came to the fellowship who was lazy, continually doing poorly, and unwilling to give of time or money, he or she was also deemed a “performance oriented” person. The reason for the poor performance was that their performance orientation had caused so many frustrations that the person gave up - they needed help.

In this “no win,” situation the real frustration was the performance orientation teaching itself. It was hopeless to escape its grasp because no matter what the person’s condition he was considered to need counseling and therapy to find deliverance. The most difficult “performance” was the one necessary to convince the practitioners of the performance orientation therapy and their followers that one did not need their services. “The fact that you object to this teaching and therapy proves you need it,” they often said. Only those who had already submitted to therapy found acceptance in the group. This process is self-defeating if “getting therapy” is a “performance” that is done to satisfy others.

In the previously mentioned book on this subject, three types of people are identified with the problem. “I want to put the cycles described in this chapter into everyday context by describing three types of people that result from buying into the lie that self-effort is the way to healthy self-esteem: the Underachiever, Overachiever, and the Roller-coaster.” This adds one category that I had not thought of, those who do well sometimes and poorly at others. If those who do well, those who do badly, and those who do well and badly are included, it seems that we all fit the bill. This must be a universal problem. I will seek to show that performance “orientation,” to use their term, is universal but it is not the problem.

**Performance Orientation** is Inescapable

All humans are performance “oriented” in a sense in which therapy to change this condition is useless. We are “oriented” toward performance in the sense that God created us such that we have functions and choices that will have consequences in our own lives and in the created world in which we have been placed. Humanness includes the fact that actions are meaningful because we are neither determined in the absolute sense of the word nor driven by irrational instinct like beasts. God created Adam and placed him in the Garden to till and keep it (Genesis 2:15), gave him the freedom to name the animals (Genesis 2:19) and gave him the responsibility to obey God’s moral law (Genesis 2:16-18). These things distinguished him from the non-human creation. His “performance” was to affect him and the rest of the creation.

A tilled garden looks much different than a non-tilled garden. We do not know exactly how this worked before the fall; but after the fall the difference is clear. There is the old story of the farmer who took over an abandoned, run-down property and began to fix it up. After a year of fixing fence, plowing, planting, weeding, etc., the local pastor came to visit. Seeing the beautiful property he remarked, “You and God did a wonderful job with this place.” The farmer answered, “You should have seen it when God had it all to Himself.”

This does not mean that God does not (in the ultimate Providential sense) have full rulership over all things. It does mean that the sphere of God’s rule over which He has placed man (the animate and inanimate non-human creation - Genesis 1:26) is directly affected by what humans do or fail to do. If our garden is overgrown with weeds because we sleep until noon every day and then waste the rest of the daylight hours in unproductive activity, we cannot blame God. God gave us this responsibility. Likewise, when Adam rebelled against God’s moral law, he was completely unjustified in blaming God (Genesis 3:12). If Adam was to have named a cow “dog” and an eagle “dog,” and a camel “dog,” etc., he would not
have changed the nature of any of them, but would have left himself a most difficult task in fulfilling the rulership duty God had given him. He would have been lacking needed categories and descriptions with which to work.

The point of this is that human action or inaction always has consequences. As humans live on the face of the earth their performance counts. This is true because of the act of God in creating man in His image and giving him dominion over the other creatures. Performance “orientation” did not come from repressive, legalistic, fundamentalists as the modern critics like to assert, it came from the creative activity of God. Therefore, it is a universal truth that can be temporarily denied but never escaped. Even redemption as a free gift of God’s grace does not negate the reality that our performance matters, but shows it. Christ died to deliver us from the effects of sin and sin would mean nothing if human actions and choices meant nothing. Otherwise the Serpent would have been right and Adam and Eve would not have died.

Even in practical matters, people cannot escape the reality of performance “orientation.” For example, in some grade schools it is now a common practice to shield students from the knowledge of their performance as compared to achievement standards by placing them in groups whose performance is similar enough to their own that they are not conscious of their shortcomings.

In one situation like this, parents of a grade schooler who came home with “happy faces” for marks in reading all year to indicate good progress were told at the end of the year that their child would have to repeat the same grade level. The shocked parents asked how this was possible with all the good reports that came home. The answer was that the student had been placed in the lowest group with all the other students who read very poorly so that he would not notice that he was doing poorly compared to the class as a whole. In the desire to “escape” performance orientation they merely postponed it until the end of the year. Not being able to read when one ought to does not equal reading ability no matter how kindly it is described.

**Performance Counts**

Performance matters for everyone. Employees who do not come to work on time nor do their job well are fired. People who do exceptional jobs at most realms of human endeavor are commended. Spouses who abuse their relationships soon have unpleasant consequences to face. Could a coach who had lost 300 straight games over many seasons legitimately protest if he were fired because the team owner was guilty of being performance oriented? Should any criminal not be arrested, any student who failed to study given a degree, any drunk given the privilege to drive, any employee who never worked given job security, etc., under the use of creating a non-performance oriented society? Clearly the answer is “no” to all of these questions.

Who then escapes evaluation and consequences that are based upon performance? No humans do - that is my point. This psychological theory is actually delivering us not from some repressive, Victorian attitude, but from being human. 1Peter 2:12 rebukes false teachers who revel in immorality as being like “unreasoning animals born as creatures of instinct...” As I mentioned earlier, psychological and theological theory that would deliver us from performance orientation so that as delivered we will be better citizens, husbands, Christians, students, etc. is itself endorsing criteria for judging performance unless “better” persons in these categories are no different in performance than “worse” ones. If they are indeed better, then performance matters and nothing has been gained. If performance matters in all of the important things in life, then we cannot help but be “oriented” in that way.

We might protest that the only reason Christians try to do well is because of God’s grace (a good and proper statement), but how can we be sure that we do not have some ulterior motive and have really never found deliverance from performance orientation? What if we do the right thing because God told us to in the Bible (“For you have need of endurance, so that when you have done the will of God, you may receive what was promised” - Hebrews 10:36), are we not still guilty of performance orientation? We would be doing what someone else (God) expected because of promised reward. Seeking freedom from performance orientation turns out to be a bigger burden than seeking to do well.

**Feeling Good While Doing Evil**

As previously stated, the key concept for self-esteem that is not based on performance is unconditional love. Dr. Brownback states, “In a sense the term unconditional love makes no sense, because there must be some underlying basis for love. And there is in fact such a basis in self-theory, the same one postulated both by secular and evangelical teachers, and that basis is human-ness.” What is being done in many cases is reducing the matter to the lowest common denominator. If we are expected to love ourselves and have high self-esteem and that not based on performance, then it must be based on the fact that we exist. Mere being is all one needs to feel good about himself.

This separates us from no one. On this basis Hitler, Herod, Nero, and all other evil despots had just as much warrant for self-love and self-esteem as Moses, David, Paul, and John the apostle. They are all human, they were all created by God and their performance cannot be allowed into the equation. If we can feel unconditionally loved, have high self-esteem, and know our “infinite” worth no matter how evil and cruel we are, then what reason does anyone have to change? What great comfort can I get knowing that I am just as lovable as Attila the Hun and Adolf Hitler? Everyone gets to be happy, self-affirmed, comfortable, etc. no matter what they do. Is there some great benefit in feeling good while doing evil?

People were horrified by the recent case of British children who laughed
and joked while they cruelly murdered a young lad, leaving his body to be mutilated by a train. One has to wonder where the outrage comes from since so much contemporary thinking has it that all people have a right to feel good about themselves without regard to their behavior. These kids were feeling good while doing evil, which fits with self-love based on nothing more than the fact of a being a live person. They fit that category. Non-performance orientation is an unworkable, hopeless, and ultimately dehumanizing philosophy. Part of being human (created in God’s image) is that we are accountable for our actions - it matters what we do.

No matter how many of these foolish philosophies modern man accepts, he cannot escape the fact that one’s performance counts and that he faces judgment by God for “deeds done in the body” (2 Corinthians 5:10, Romans 2:6, Matthew 16:27). The doctrine of salvation by faith, not of works, not of human merit, etc. does not negate the equally clear teaching of final, universal judgment in which we are judged according to our actions. The Bible speaks of degrees of reward (1 Corinthians 3:8-15, Luke 6:35) and of punishment (Luke 12:42-47, Matthew 23:14). There is no Biblical justification for the teaching that our performance should have no bearing on our feelings about ourselves.

**The Gospel as the Work of God**

“Draw near to God and He will draw near to you. Cleanse your hands, you sinners; and purify your hearts, you double-minded. Be miserable and mourn and weep; let your laughter be turned into mourning, and your joy to gloom” (James 4:8,9). This does not fit with feeling unconditionally loved, high self-esteem, etc. no matter what we do. Rather than feeling good about the situation, a little misery, mourning and weeping (accompanied with faith and repentance) like James prescribes will result in a more meaningful joy than the one that is gained through trying to feel good while doing evil. Performance counts, but we can be forgiven for our bad performance through the blood of Jesus and empowered for good performance by the indwelling Holy Spirit. This is the good news of the Gospel.

No amount of human effort can deliver us from our lost condition. No autonomous works can be done to commend us to God. Only humble acknowledgement of our sin and our need for supernatural regeneration is acceptable to God. We can never “perform” well enough to come to God without Messianic atonement. “They said therefore to Him, ‘What shall we do, that we may work the works of God?’” (John 6:28). “Jesus answered and said to them, ‘This is the work of God, that you believe in Him whom He has sent’” (John 6:29). If Messiah is rejected, all other works, no matter how commendable, are useless in finding acceptance with God. Yet even believing upon Him is called “the work of God.”

For by grace you have been saved through faith; and that not of yourselves, it is the gift of God; not as a result of works, that no one should boast. For we are His workmanship, created in Christ Jesus for good works, which God prepared beforehand, that we should walk in them. (Ephesians 2:8-10)

According to this passage, faith in God (including believing upon Messiah John 14:1) is the basis of salvation, grace is the agency of salvation, and good works are the purpose (“for”) of salvation. These “good works” are conditioned by the fact of our being “His workmanship,” not our own cleverness. The obedience of faith (Romans 1:5) is part and parcel of salvation and sanctification. The Gospel cannot be divorced from the importance of human actions neither in the reason for its proclamation (human sin and lostness) nor in its result (changed lives).

**Conclusion**

The performance orientation theory of pop-psychology confuses and fails to do justice to the Biblical teachings about human actions. It gives no basis for Biblical morality, law, and restraint. It gives no clear understanding of salvation as taught in Scripture. It is unworkable because it denies the fact that having been created in God’s image makes all humans aware of their performance and accountable for its results. It fails to adequately distinguish between humans as moral agents and instinctive beasts. It tacitly or overtly denies the Biblical doctrine of the Fall by claiming that unrestrained humans will do what is right without external motivation or intervention. It claims to give all humans the right to have self-esteem and good feelings about self on no other basis than the fact that they exist, thus putting kindness and virtue on equal footing with evil cruelty. It is self-defeating in the sense that those who try to follow performance orientation psychological teachings and practices are judged by those teachings and either “measure up” or do not, making these teachings “performance oriented.” For these reasons, I urge Christians to reject the performance orientation theory as popularly taught and cling to the teachings of God’s word.


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**End Notes**

2. ibid. 81.
3. ibid. 82.
4. ibid. 83.
6. ibid. 82.
7. op. cit. Brownback, 66.