

# Education Clauses in State Constitutions Across the United States\*

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## Executive Summary

This article documents the variation in strength of education clauses in state constitutions across the United States. The U.S. Constitution is silent on the subject of education, but every state constitution includes language that mandates the establishment of a public education system. Some state constitutions include clauses that only stipulate that the state provide public education, while other states have taken more significant measures to ensure the provision of a high-quality public education system. Florida's constitutional education clause is currently the strongest in the country – it recognizes education as a fundamental value, requires the state to provide high-quality education, and makes the provision of education a paramount duty of the state.

Minnesota can learn from the experience of other states. Most states have amended the education clause of their state constitutions over time to reflect the changing preferences of their citizens. Between 1990 and 2018, there were 312 proposed amendments on ballots across the country, and 193 passed. These amendments spanned various issues. Policymakers and voters in each state adopted the changes they deemed necessary for their education system. Minnesota has not amended its constitutional education clause since it was first established in 1857.

Constitutional language matters. We use Florida and Louisiana as case studies to illustrate that constitutional amendments can be drivers of change. Institutional changes to the education system that citizens of Florida and Louisiana helped create ultimately led to improved outcomes for their children. Minnesota can do the same. The first step is to amend the 1857 language to better reflect the preferences and needs of citizens in 2020.

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# 1 Language in Constitutional Education Clauses

This section outlines the variation in the strength of education clauses in state constitutions across the United States. The U.S. Constitution is silent on the subject of education, but every state constitution includes some language that mandates the establishment of a public education system. There is large across-state variation in strength of the education clauses. Some state constitutions only require that a free, public or a common system of education be established and maintained. Other states are more specific and include language such as "uniform" or "thorough and efficient." These terms form the minimal constitutional mandates to which the legislature must conform in establishing a public school system.

Table 1 documents the specific provisions included in current state constitutions across the United States. We focus on terms used to specify the qualities of the system required. These terms ensure that education provisions go beyond just the establishment and maintenance of a free, public, or common system. For each of the following terms, Table 1 provides a list of states that include such provisions in their education clause: (1) "Uniform" (2) "Thorough"/"Efficient" (3) "Equal Rights" (4) "Paramount"/"Primary" Duty of the state (5) "High-Quality Education," and (6) "All Children."

In addition to defining the rights of citizens (or children), duties of the state, and the characteristics of the system to be provided, the education clauses also include specific provisions. Row 7 lists the states that include constitutional provisions requiring the legislative or executive body to define academic standards. For example, Section 8 in Article VIII of Oregon's constitution mandates that the Legislative Assembly appropriate sufficient funds to *"ensure that the state's system of public education meets quality goals established by law..."* Virginia's education clause is more explicit in its standards of quality:

**Article VIII, Sec. 2. Standards of Quality; State and Local Support of Public Schools.**

Standards of quality for the several school divisions shall be determined and prescribed from time to time by the Board of Education, subject to revision only by the General Assembly. The General Assembly shall determine the manner in which funds are to be provided for the cost of maintaining an educational program meeting the prescribed standards of quality, and shall provide for the apportionment of the cost of such program between the Commonwealth and the local units of government comprising such school divisions. Each unit of local government shall provide its portion of such cost by local taxes or from other available funds.

An important fact to note from Table 1 is that Florida's current education clause includes the strongest language in the country. The education clause states that *"education of children is a fundamental value of the people"* and requires adequate provision to be made by law for a *"uniform, efficient, safe, secure and high quality system of free public schools."* It is strong because it recognizes children's right to education and mandates that it is a *"paramount duty of the state"* to provide for high-quality education.

**Table 1:** Language in Education Clause of Current State Constitutions

	<b>Provision</b>	<b>States</b>
1	Uniform	Indiana, North Carolina, Florida, Minnesota, Nevada, Oregon, Wisconsin, Arizona, Colorado, Idaho, New Mexico, North Dakota, South Dakota, Washington, Wyoming
2	Thorough/Efficient	Delaware, Ohio, Pennsylvania, Arkansas, Florida, Illinois, Kentucky, Maryland, Minnesota, New Jersey, Texas, West Virginia, Colorado, Idaho, South Dakota, Wyoming
3	Equal Rights	Florida, Indiana, Illinois, Louisiana, Michigan, Montana, Washington
4	Paramount/Primary Duty	Florida, Washington
5	High-Quality Education	Florida, Illinois, Virginia
6	Provisions defined for “All Children”	Alaska, Florida, New Mexico, New York, North Carolina, North Dakota, Oklahoma, South Carolina, Utah, Virginia, Washington
7	Requires legislative or executive body to define academic standards	Oregon, Virginia
8	Includes a specific education policy prescription	
	Class size	Florida
	Charter schools	Georgia
	Early childhood education	Florida, Hawaii, Nebraska, Tennessee
	Compulsory attendance	Colorado, Delaware, Idaho, New Mexico, North Carolina, Oklahoma, Virginia
	State takeover of failing schools	Louisiana
	Unbiased textbook choice	Colorado, Oklahoma, Wyoming
	Teacher training	New Mexico

## 2 Amending Education Clauses in State Constitutions

The specific language from current state constitutions described in the previous section may not necessarily be the same as the original language. The language in constitutions evolves over time through the process of constitutional amendments, an option all state constitutions include. There are two main ways to initiate an amendment – through a legislative referral or through a direct initiative by the people.

The legislature-generated amendment process begins with the legislature passing an act proposing a change in the constitution. The proposed amendment must be approved by both chambers of the legislature.<sup>1</sup> Some states require a simple majority, while others require a super majority. Once approved, it is put to popular vote on the ballot. The threshold of votes required for passing an amendment varies across states. All states currently allow legislatures to generate amendments.

In the case of a direct initiative or a citizen-initiated amendment, once a sufficient number of signatures have been collected through a petition, the proposal is put to popular vote as a ballot measure. Currently, only 18 states permit citizens to initiate constitutional amendments, including Florida, Illinois, and Massachusetts.

In addition to legislature-generated and citizen-initiated methods, the 1968 Florida constitution was the first in the country to authorize an independent commission to directly submit recommended amendments to the electorate for a vote. By constitutional mandate, an automatic commission called the Constitution Revision Commission (CRC) is established every 20 years.<sup>2</sup>

Most education clauses have been amended several times over the past century. We collected and verified data from official sources on all recently proposed amendments that reached the ballot. Figure 1 shows the across-states distribution of proposed amendments related to education between 1990 and 2018. A total of 312 amendments were put on state ballots across the country in this time period. The number of amendments proposed varies across states. Colorado, Oregon, and Texas each have more than 20 proposed amendments, while New Jersey and Illinois had only one proposed amendment. Minnesota had none.

Figure 2 plots the frequency of proposed amendments by year for the time period 1990-2018. As expected, the number of amendments proposed spiked in major election years. The average number of proposed amendments on the ballot is higher in the 1990s compared to the late 2000s and 2010s.

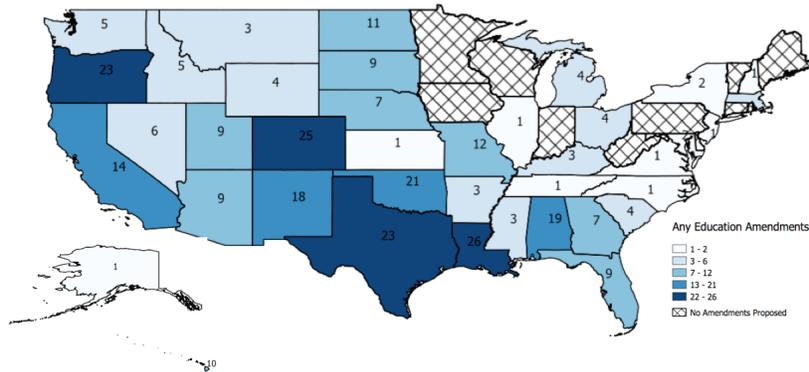
These proposed amendments address various issues ranging from general management of

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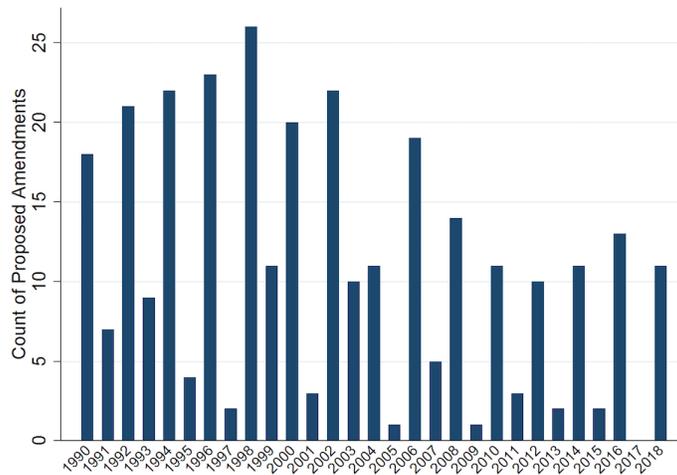
<sup>1</sup>Nebraska is unicameral and requires three-fifths legislative approval.

<sup>2</sup>Florida is currently the only state in the country where a proposed amendment can be put on the ballot based on recommendations of an independent commission.

**Figure 1:** Proposed Educational Amendments on the Ballot by State, 1990-2018



**Figure 2:** Frequency of Proposals to Amend Education Clause of State Constitutions



Source: Authors' calculations

the school system to specific prescriptions such as state takeover of failing schools (Louisiana). Table 2 categorizes the ballot measures based on the main issue to be amended. Panel (a) provides the distribution of nonrevenue-based amendments. There were four amendments proposed to declare education as a fundamental right (or of "fundamental value"). Of these, only one passed – Florida’s 1998 amendment. Of the 12 proposed amendments that provide for equal access to education,<sup>3</sup> eight were passed.

Panel (b) provides the count of ballot measures introduced and the proportion which were revenue-based amendments. The category with the largest number of amendments proposed is "Creating Dedicated Funds." This category includes creation of education funds using the revenue received by the state from special levies and lottery monies. The second-biggest category is to increase revenue through either raising taxes and debt limits or removing

<sup>3</sup>These are primarily antidiscriminatory provisions.

property tax exemptions. Panel (c) of Table 2 lists other miscellaneous amendments.

**Table 2:** Proposed Amendments by Category (1990-2018)

Category	Total Proposed	Total Passed
<b>[a] Nonrevenue-Related Amendments</b>		
Compulsory Attendance	1	0
Early Childhood Education	5	3
Education First - Paramount Issue	2	2
English Language Requirements	4	1
Equal Access	12	8
Fundamental Right to Education	4	1
Improving Quality of Education	1	0
Parental Rights	2	1
Reduce Class Size	2	2
Role of State in Funding	7	5
School Choice	8	1
School Oversight and Accountability	6	4
State Takeover of Failing Schools	2	1
Teacher Pay for Performance	3	1
Use of Public Facilities	2	2
<b>[b] Revenue-Related Amendments</b>		
Expenditure - Limitations or Requirements	6	2
Expenditure - Increase Per-pupil Amounts	2	0
Funding - Creating Dedicated Funds	66	48
Funding - Equitable Allocation of Funds	5	4
Funding - Increase in Revenue	47	27
Funding - Investing Public Funds	13	6
Funding - Tax or Debt Limits	14	10
<b>[c] Other Amendments</b>		
Higher Education	64	40
Other Miscellaneous Provisions	32	24
<b>Total</b>	<b>312</b>	<b>193</b>

Source: Authors' calculations

### 3 Constitutional Amendments As Drivers of Change

In this section, we illustrate that constitutions provide a framework for policymakers to make changes necessary for providing quality education services. We use Florida's 1998 amendment and Louisiana's 2003 amendment as case studies to illustrate that constitutional amendments can be drivers of change.

#### 3.1 Case Study: Florida's 1998 Amendment

Florida's constitution stands out not only in the strength of the language of its education clause but also in allowing direct community involvement in amending the state constitution. When the members of the 1998 Constitution Revision Commission (CRC) held public hearings across Florida in their year-long tour, the issue of education was salient. At that time, Florida's educational achievement levels were among the worst in the country. One of the recommendations of the 1998 CRC was an amendment to the education clause of the constitution. The language added to the then-existing Article IX, Section 1 is underlined in the text below. The CRC's recommended amendment was put directly on the ballot, and it passed with 71 percent of the votes. It led to Florida's constitutional education clause becoming the strongest in the country.

##### Florida's 1998 Constitutional Amendment

###### ARTICLE IX EDUCATION

SECTION 1. ~~System of~~ Public education. The education of children is a fundamental value of the people of the State of Florida. It is, therefore, a paramount duty of the state to make adequate provision for the education of all children residing within its borders. Adequate provision shall be made by law for a uniform, efficient, safe, secure, and high quality system of free public schools that allows students to obtain a high quality education and for the establishment, maintenance, and operation of institutions of higher learning and other public education programs that the needs of the people may require.

Following the amendment, a comprehensive set of legislative policies were adopted in June of 1999. To meet the state's constitutional duty to provide all children the opportunity to obtain a high-quality education, the state of Florida enacted the "School Readiness Act" to prepare at-risk children for school. It established an "Opportunity Scholarship Program," which would allow students from failing schools to attend a public school that is performing satisfactorily or to attend an eligible private school.<sup>4</sup> To ensure improvements in quality of teaching across public schools, the state raised standards for certifying professional educators,

<sup>4</sup>Section 229.0537, *Florida Statutes*, was added to describe the eligibility, the obligations of school districts, and the funding requirements.

established a statewide system for inservice professional development, and increased accountability for postsecondary programs that prepare future educators.<sup>5</sup> To ensure continuous and improved learning, the Legislature added requirements for public schools to monitor attendance, to reach out to families whose children display a pattern of nonattendance, and to find appropriate remedies to enforce school attendance.<sup>6</sup>

In addition to amending Section 1, other sections of the education clause in Florida's constitution were amended in 1998 to authorize the reorganization of Florida's education system. The objective was to centralize the structure of governance in order to align responsibility with accountability for academic success and funding efficiency. It required a new state board of education consisting of seven members appointed by the governor (subject to confirmation by the Senate), and it required that the State Board of Education appoint the Commissioner of Education. These changes were codified in 2000 as the Florida Education Governance Reorganization Act of 2000. The Florida Board of Education was granted the authority for education from pre-kindergarten through graduate school education (K-20), and it took over responsibilities from numerous commissions and boards that were eliminated.<sup>7</sup>

In 2002, the citizens of Florida initiated two more constitutional amendments with the objective of introducing specific prescriptions in the constitution to ensure that the goal of "high-quality" education is met. The first proposal required the legislature to restrict the number of students in a classroom and for the legislature to provide the funds to do so. It passed with 52.4 percent of the votes. The second citizen-initiated proposed amendment in 2002 required the establishment of free voluntary universal pre-kindergarten that would ensure a high quality learning opportunity for every four-year-old child in Florida. It passed with 59.2 percent of the votes.

Education outcomes have improved in Florida since the adoption of constitutional amendments and the resulting legislative policy changes in the early 2000s.<sup>8</sup> Panel (a) in Figure 3 plots the Grade 4 reading scores on the National Assessment of Educational Progress (NAEP) in 2003 (x-axis) and 2019 (y-axis). States above the red 45-degree line have improved their test scores from 2003 to 2019, while scores for states below the 45-degree line have declined during the same time period. Florida's Grade 4 reading scores (circled in red) have improved over time, and its relative ranking has improved from 33rd in 2003 to 6th in 2019. Panel (b) in Figure 3 shows that while there was a significant increase in the level of average Grade 8 math scores, Florida made marginal relative gains – its ranking improved from 39th to 35th.

In addition to improvements in average test scores, Florida made substantial reductions

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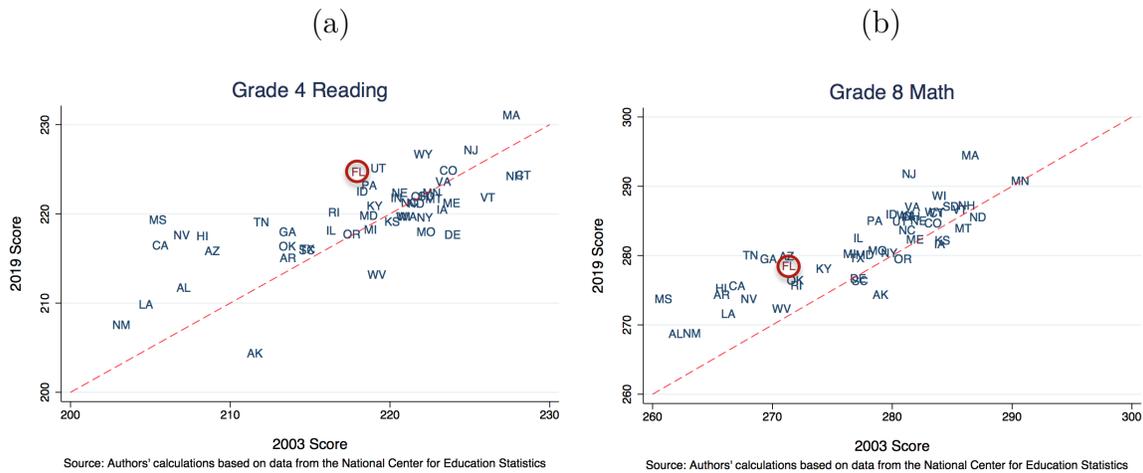
<sup>5</sup>See the following sections of the *Florida Statutes* (1999): Section 231.09, Section 231.145, Section 231.15, Section 231.29(3), Section 236.08106(2), Section 240.529, and Section 231.6135.

<sup>6</sup>See Section 232.17, *Florida Statutes* (1999).

<sup>7</sup>The "Florida K-20 Education Code" was enacted in 2002. See Ch. 2002-387, Florida Laws.

<sup>8</sup>The changes documented in this section are illustrative and should not be interpreted as causal. Without rigorous empirical analysis, it is not possible to assess the contributions of specific policies in accounting for the observed patterns.

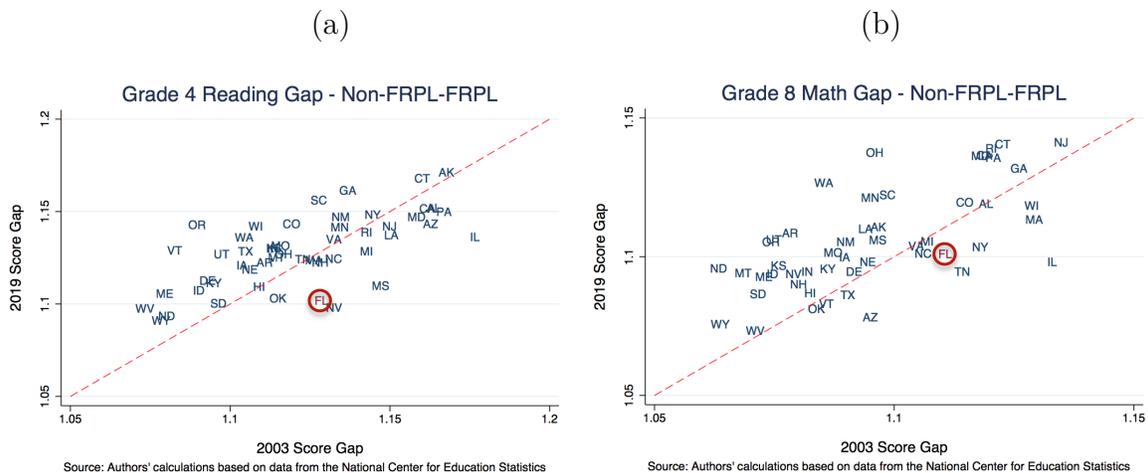
**Figure 3:** Across-states Comparison of Average NAEP Scores



in test score gaps across socioeconomic status. Students' socioeconomic status is proxied by whether they are eligible for free or reduced price lunch (FRPL). Figure 4 shows the ratio of Non-FRPL-FRPL students' NAEP scores in 2003 (x-axis) and 2019 (y-axis). Florida lies below the 45-degree line for both reading and math, indicating that gaps across socioeconomic status declined over time. Panel (a) plots the gaps in Grade 4 reading scores. Florida had the 30th lowest gaps in 2003 and 6th lowest gaps in 2019. For Grade 8 math NAEP scores (panel (b)), Florida had the 37th lowest gaps in 2003 and 23rd lowest gaps in 2019.

In 2003, Florida had the lowest White-Hispanic gap in the country for both Grade 4 reading scores and Grade 8 math scores, and it remains one of the states with the lowest gaps. While the White-Black gaps in NAEP scores have declined over time in Florida, they remain much higher than the White-Hispanic gap.

**Figure 4:** Across-states Comparison of Gaps in NAEP Scores Across Socioeconomic Status



### 3.2 Case Study: Louisiana's 2003 Amendment

We now chronicle the case of a legislature-generated amendment adopted by the state of Louisiana and argue that it led to major policy changes in New Orleans following Hurricane Katrina. Recent research has documented that these major policy changes in turn had positive effects on educational outcomes. Table 4 outlines the major events described in this section.

In May 2003, Louisiana's legislature passed Act 9, which led to a legislature-initiated proposed constitutional amendment to allow state takeover of failing schools. In October 2003, the amendment passed on the ballot with 59.8 percent of the votes. It provided the Louisiana Board of Elementary and Secondary Education (BESE) the legal right to take over chronically low-performing schools. Schools identified as failing due to low test scores and other performance measures were eligible for takeover by BESE and could be handed over to the newly created, state-run Recovery School District (RSD).

In the first year after the amendment was passed, 17 schools statewide were deemed eligible for takeover. Of these, 16 were in New Orleans. Moreover, 34 more schools in New Orleans (roughly a third) were labeled as academically unacceptable (AUS) and thus likely eligible for takeover in subsequent years. At the end of the 2004-05 school year, over 63 percent of public schools in New Orleans had been deemed AUS, compared to 13 percent of public schools across the state. The state took control of four more of the lowest-performing schools in Orleans Parish, handing them over to the RSD to be reopened under new management.

The takeover of a handful of failing schools, however, did little to solve the problems facing public education in New Orleans. The severity of the system's problems was well understood by public officials at the local, state, and federal levels. The Orleans Parish School Board (OPSB) and the district central office continued to be considered ineffective and corrupt, so much so that in 2004 a special FBI task force was assigned to investigate the school system, and 11 district employees were indicted (Vaughan et al. (2011)).

In August 2005, Hurricane Katrina struck New Orleans. Approximately 65,000 New Orleans public school students and their families were forced to evacuate the city. District leadership and teaching staff were similarly displaced. The city was in a state of turmoil. The destruction caused by Katrina drove a need to take over the majority of public schools in New Orleans.

It was Louisiana's constitutional amendment and creation of the RSD that acted as a vehicle for state intervention. In mid-November 2005, in a special session of the Louisiana Legislature, legislators approved Act 35, which redefined the performance threshold by which schools and districts were identified as failing and increased the state's power to intervene in school districts. Based on Act 35, a district became "academically in crisis" if it had at least 30 failing schools and/or 50 percent or more of its students enrolled in failing schools. As a

result, entire districts could be labeled “academically in crisis.” Schools in a district labeled “academically in crisis” would be deemed failing schools based on their performance relative to the state average, rather than the constant performance threshold previously used. This was a significant change. Schools in a district labeled “academically in crisis” were considered failing if their school performance score (SPS) fell below the state average of 87.4, while schools in other districts were considered failing if their SPS fell below 60 (Vaughan et al. (2011)).

Under this new benchmark, Orleans Parish was considered a district “academically in crisis” based on school performance. This allowed the state to intervene on a large scale. As a result, 114 low-performing OPSB schools were moved into the state-run RSD, which was charged with opening and operating the schools under its control for an initial period of five years. The OPSB retained control of only 17 of the schools it operated before Katrina. Students enrolled in state takeover schools were guaranteed seats in the RSD.

Abdulkadiroğlu et al. (2016) evaluated the causal effects of the RSD on students’ achievement using an instrumental variables strategy based on the grandfathering provisions used initially to fill student enrollment. They found that school takeovers in the RSD generated substantial achievement gains for the low-income student population. The takeover effects were larger in Grade 7 and Grade 8 compared to earlier grades and were larger in the first two years following a school takeover compared to later.

**Table 4:** Constitutional Amendments Can Be Conducive to Major Policy Changes

2003	<ul style="list-style-type: none"> <li>● May – Act 9 adopted in the legislature authorizing Louisiana’s Board of Elementary and Secondary Education (BESE) to provide for operation of failed schools and establishing the Recovery School District (RSD).</li> <li>● November 6 – Constitutional amendment passed on the ballot with 59.8 percent of the votes. It provided BESE the legal right to take over chronically low-performing schools.</li> </ul>
2004	<ul style="list-style-type: none"> <li>● Under the constitutional provisions, 17 schools statewide were deemed eligible for takeover. Of these, 16 were in New Orleans. Only five school takeovers completed prior to Katrina.</li> <li>● At the end of the 2004-05 school year, over 63 percent of public schools in New Orleans had been deemed academically unacceptable (AUS), compared to 13 percent of public schools across the state.</li> </ul>
2005	<ul style="list-style-type: none"> <li>● August 29 – Hurricane Katrina hit New Orleans. Orleans Parish School Board (OPSB) was unable to re-open schools for the next school year, while private and charter schools re-opened for the fall semester.</li> <li>● September 15 – All OPSB employees were placed on disaster leave without pay.</li> <li>● November 30 – Louisiana’s 2003 constitutional amendment and creation of the RSD acted as a vehicle for state intervention. Governor Blanco signed Act 35 under which a district became “academically in crisis” if it met certain criteria, under which New Orleans qualified.</li> </ul>
2006	<ul style="list-style-type: none"> <li>● March 24 – OPSB officially terminated all remaining employee contracts as school governance and operations were transferred to the RSD.</li> </ul>

## 4 Education Clause in Minnesota's Constitution

The current education clause in Minnesota's constitution has its origins in the 1857 constitution. The provisions for public education in the 1857 Minnesota constitution were outlined in Sections 1 and 3 of Article VIII. Section 2 (omitted below) outlined the use of proceeds from land.

### Education Clause in Minnesota's 1857 Constitution

#### ARTICLE VIII School Funds, Education And Science

Section 1. The stability of a republican form of government depending mainly upon the intelligence of the people, it shall be the duty of the Legislature to establish a general and uniform system of public schools.

Section 3. The Legislature shall make such provisions by taxation or otherwise as with the income arising from the School fund, will secure a thorough and efficient system of Public Schools in each township in the State.

In Minnesota's 1962 constitution, various sections of the education clause were moved into separate articles. In particular, Sections 1 and 3 of Article VIII in the 1857 Minnesota constitution were combined and remain as such today. The current provision for public education in Minnesota's constitution is as follows.

### Current Education Clause in Minnesota's Constitution

#### ARTICLE XIII MISCELLANEOUS SUBJECTS

**Section 1. Uniform system of public schools.** The stability of a republican form of government depending mainly upon the intelligence of the people, it is the duty of the legislature to establish a general and uniform system of public schools. The legislature shall make such provisions by taxation or otherwise as will secure a thorough and efficient system of public schools throughout the state.

## 5 Concluding Remarks: Lessons for Minnesota

In 1968, Florida became the first state in the country to set up a commission that would recommend amendments to the constitution directly to the citizens of the state. The idea was to allow the citizens and communities to directly define the scope of policies adopted by the state. In 1998, the commission recommended and the citizens approved changes to Florida's constitutional education clause that would make it the strongest education clause in the country – it recognized education as a fundamental value, it required the state to provide high-quality education, and it mandated that the provision of education is a paramount duty of the state. Following the amendment, a comprehensive set of legislative policies were adopted to execute the new provisions.

This article shows that most states across the country have amended the education clause in their state constitutions over time to reflect the changing preferences of their citizens. Between 1990 and 2018, there were 312 proposed amendments on state ballots across the country, of which 193 passed. These amendments spanned various issues from declaring education as a fundamental right to provisions for charter schools. Each state adopted changes it deemed necessary for its education system. Minnesota has not amended its constitutional education clause since 1857.

The case study of Louisiana further illustrates that constitutional language matters and that constitutional amendments can be drivers of change. The institutional change to the education system that the citizens of Louisiana helped create ultimately led to improvements in outcomes for their children.

What worked in Florida and Louisiana may not work for Minnesota. However, Minnesota can learn from the experience of other states. Minnesota currently has one of the largest disparities in educational outcomes across race and socioeconomic status. These outcome gaps have persisted over the past two decades. It is time to re-evaluate the framework within which education policies are chosen. The first step is to amend the 1857 language to better reflect the preferences and needs of citizens in 2020.

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