**Changing The Rules of the Game:**

**Quorum Requirements and Preservation of Partisan Advantage in State Legislatures**

**Abstract**

Legislative rules organize the business of legislative chambers. Existing research shows the rules may affect legislative outcome, and that they may be manipulated by self-interested legislators either for electoral or policy gain. I hypothesize that quorum rules established by a legislature itself should be no greater than the elected majority, and when constitutions establish higher quorums, self-interested legislative majorities will reduce them unless they are disincentivized or procedurally unable. This paper reviews state legislative rules, state legislative election results, and state constitutions to evaluate these hypotheses. I identify whether legislative quorum requirements are in constitution or rule, the size of the quorum required, the partisan breakdown of select state legislatures, and the constitutional amendment procedure of select state legislatures. I find that in states where the legislature retains endogenous control of their quorum requirements, those requirements have been set at a simple majority. I further find that states that retain two-thirds constitutional quorum requirements do so because the higher quorum requirement does not affect legislative business or because some aspect of the state constitutional amendment procedure empowers the legislative minority, but do not find an explanation for the retention of the two-thirds quorum requirements that applies to every case in which they are retained.

**Introduction**

In 2019, Oregon Republicans walked out. Objecting to the Democrats’ tax plan, but with an insufficient number of legislators to prevent its passage if it came to a vote, Senate Republicans denied the Democrats a quorum and brought the business of the legislature to a halt (VanderHart, 2019). For the most part, they seemed to flee the state, only returning when two unrelated pieces of legislation, addressing gun control and childhood vaccine exemptions, were scrapped. They walked out again later that session over carbon cap-and-trade legislation, which Democrats removed from the docket to ensure their return (Roberts, 2020). Viewing their actions as successful, in subsequent sessions Oregon Republicans walked out in protest of climate legislation (Borrud, 2020) and Covid restrictions (Borrud, 2021).

This tactic is not unique to Oregon Republicans. In recent years, Democrats in Texas have done similarly, while Oregon Democrats walked out in 2001. This tactic is a sound strategic decision under circumstances where the legislative majority has sufficient votes to enact their legislative agenda but does not have a majority sufficient to continue floor business on its own. We might then ask why the mismatch exists between the size of the legislative majority and the majority required to secure a quorum. In a world where legislators are rational actors who in many cases can design the rules of their institutions, this tool should not be available to a legislative minority.

This paper examines quorum requirements in state legislatures, by reviewing state constitutions and state legislative rules, to identify under what circumstances a quorum requirement remains a tool of the legislative minority to impact the majority’s legislative agenda. I find that in most states, the majority required to advance a legislative agenda and the majority required to conduct legislative business have harmonized. I further find that, in those few states that have constitutionally adopted a higher quorum requirement than a simple majority, the quorum requirement has not been lowered due to a lack of incentives or rigorous constitutional requirements empowering the partisan minority.

**Background and Literature Review**

Legislative business is regimented through rules of procedure. Legislative rules of procedure may be defined as “both the standing orders the legislature may establish for itself and those statutory or constitutional provisions that materially affect the legislature’s processing of bills” (Cox, 2000, p. 169). However, for the sake of clarity, this paper will restrict the meaning of legislative rules to those “standing orders the legislature may establish for itself” and will specify when referring to constitutional requirements. Standing orders are generally adopted at the beginning of each legislative session. They may be modified, and generally have provisions for their own suspension if necessary. At the state level, an unelected official such as the clerk of the chamber or parliamentarian is frequently responsible for the maintenance of these rules.

In general, existing scholarship has focused on rules of legislative procedure at the national level. Research has identified that legislative rules can affect legislative outcomes, whether those rules are set by the legislature itself or by additional external actors. Scholars have also found that legislators may strategically manipulate the procedural options available to them. At the state level, research is more limited, but the comparability of states coupled with variations in procedure, rule, and partisan context presents significant opportunities for further study.

In his overview of the effect of legislative rules, Cox (2000) discusses the mechanics of legislative rule change and interrogates why rules might constrain a majority who can otherwise alter them. For the most part, as Cox notes, legislative rules of procedure may be changed by a simple majority of legislators (p. 169); however, he indicates a distinction critical in any analysis of a rule change. There are “endogenous rules” that the legislature may change, and “exogenous rules,” which can only be changed with “the assent of some other actors separate from or external to the legislature” (Cox, 2000, p. 170). In some states, quorum requirements are exogenous, enshrined in the state constitution with additional procedural requirements for their modification. In others, however, quorum requirements are endogenous.

Cox further details rationales behind a lack of rule change when endogenous rules stymie the elected legislators from enacting policy preferred by a majority of their number, with the objective of demonstrating why endogenous rules controlled by the legislative majority might still constrain that majority. Cox (2000) notes that rules may be preserved because they are the preference of the majority party or costly to enact (p. 172). If the majority party benefits from retaining the rule, the rule may be preserved even if it is endogenous and can impact the outcome of legislation; parties may be able exert sufficient control over their members that they may prevent them from defecting on matters of legislative rule changes. Cox (2000) explains at length the potential cost of legislative rule changes, with time expended to research alternatives, develop strategy, and assemble coalitions (p. 172). When considering the opportunity cost of advancing other substantive legislation, a rule change may not be worth the effort even if it is objectively in the best interest of the legislators involved.

Research shows that changes to quorum rules at the national level can change legislative behavior. Koo (2018) reviews evidence from the Korean National Assembly before and after a rule change increasing the quorum threshold for reporting a bill out of committee and finds that while bipartisan association of a bill negatively impacted its chances of passing when the committee quorum was a simple majority, bipartisanship positively impacted a bill’s chances of passing when the committee quorum was increased to three fifths. Koo (2018) notes, however, that significant changes to quorum requirements in national legislatures are rare and credits the preexisting institutionalization for that rigidity (p. 162). That rigidity means that few opportunities exist to test Koo’s findings elsewhere.

Research also shows that, despite challenges in changing rules of legislative procedure, lawmakers strategically manipulate existing procedural rules to their own advantage. Crisp and Driscoll (2012) show that legislators in Mexico and Argentina will make strategic decisions between voting methods, choosing to take roll call votes, rather than using other means by which legislators are not individually accountable, when the value of position-taking is enhanced. Sinclair (2017) outlines the ordinary and extraordinary rules of the US Congress, demonstrating that the general conception of the movement of a bill through congress is no longer accurate when Congress considers legislation of a particular magnitude or importance. Sinclair argues that the unorthodox procedures she describes, often demonized when contrasted with “regular order,” can be used as solutions to problems of legislative gridlock when deemed necessary by legislative leaders. The authors’ demonstration of procedural decision-making shows that legislators possess sophisticated awareness of the consequences of different legislative procedures and will take advantage of those procedures when the benefits outweigh the costs of doing so.

Existing research focuses on national legislatures, at the expense of the states, which may themselves provide a fertile ground for interrogation. As Clucas writes in his 2003 review of state legislative research, “these 50 bodies provide significant, but limited, variation on structural, cultural, and political variables that can influence lawmaking, while still being far more comparable than, say, most national legislative bodies.” He continues that, at least within the 1990-2003 timeframe of his review, research on rules and processes of state legislatures had been limited (Clucas, 2003, p. 395). Clucas (2003) writes, “we know little about why legislatures adopt particular rules” (p. 396); this opens wide expanses for study.

Squire and Hamm (2005) dedicate some attention to legislative procedure in their study of state legislative chambers. They note that, in states other than Nebraska, the majority party will vote in a bloc to organize the chamber (Squire & Hamm, 2005, p. 103). They further identify that “the ability of the majority of the legislature to work its will” (Squire & Hamm, 2005, p. 118), as well as floor procedures more generally, is under-studied in the literature. While the rise in formal theory has brought the importance of rules to the forefront, similarly to Clucas they note that studies focus on the US House and neglect state legislatures (Squire & Hamm, 2005, p. 126). Squire himself works to fill that gap in his 2013 article on the exploitation of quorum rules by legislative minorities from colonial legislatures to the present. He finds that the strategic use of quorum requirements has changed in its nature as legislatures have modernized, and further finds that quorum rules are only seriously exploited in legislatures where there is a requirement higher than a simple majority.

The research sets the stage for questions of quorum requirements in the states. If legislators at the state level can change rules, and are aware of the strategic importance of their procedural rules, and are aware that rules can change outcomes, have they adapted those rules to match their political fortunes? If not, why not? Is simple exogeneity a sufficient explanation? There are varying degrees of exogeneity and the exogeneity of quorum requirements may not make those requirements inalterable. While legislators may set the rules of their chamber with a majority vote of either senators or house members, a change to statute requires the ascent of only one more player, the Governor. Constitutional changes may be more exogenous than statutory ones, but those changes will, in many states, require the participation of legislators. Therefore, this paper will consider modifications to state constitutions as well as state legislative rules, when evaluating strategic decisions affecting legislative procedure. Understanding that legislators play a part in changing even exogenous rules, the state of the literature lets us ask, again, why have exogenous rules not been changed to accommodate legislative majorities where quorum rules could constrain them?

**Theory**

Borrowing from Cox, I theorize that legislative rules should not impact legislative outcomes if legislators have the power to change those rules. Self-interested or policy-seeking legislators who wish to see their agendas enacted will eliminate the procedural barriers between themselves and their goal. I therefor theorize that the legislative majority will reduce quorum requirements to a simple majority when it is within their power to do so. I further theorize that, when quorum requirements are not a simple majority, some source of pressure exists preventing or disincentivizing the rule change.

I hypothesize that where legislative quorum requirements are strictly endogenous, legislative chambers should have developed quorum requirements less than or equal to the typical majority margin. This result should be anticipated because state legislative majorities have the opportunity to adopt new rules at the beginning of each session, free from elevated quorum requirements enacted by previous sessions, and the equilibrium at which business may be conducted by the majority party is the size of their majority and no more. Self-interested majorities intent on maximizing their opportunity to enact their agenda should minimize potential for interference of the minority in this way.

H1: If the legislature controls the quorum requirement, the quorum requirement should be equivalent to or less than the legislative majority.

I further hypothesize that it may not always be politically necessary, or politically expedient, to alter quorum requirements to harmonize the size of the legislative majority with the size of the quorum requirement. Countervailing pressures causing legislatures to preserve quorum requirements greater than a simple majority may be institutional or strategic. The institutional pressure I predict may be found in the constitutional amendment procedure, while the strategic pressures will be indicated by the election results. I hypothesize that if the constitutional amendment process empowers the minority legislative party, higher quorum requirements for legislative business will be maintained. Additionally, I hypothesize that where there is no consistent partisan majority in power, or where the partisan majority is greater than the higher quorum requirements, constitutional quorum requirements will not change.

H2A: If constitutional amendment process gives a veto to the legislative minority party, the constitutional quorum rule will not change.

H2B: If legislative power vacillates between parties, the constitutional quorum rule will not change.

H2C: If the majority party holds a majority consistently greater than the constitutional quorum rule, the constitutional quorum rule will not change.

**Methodology**

This paper evaluates whether legislators are acting strategically to preserve their partisan advantage by manipulating quorum rules. By reviewing state constitutions and legislative rules for the 2021 legislative session in each of the 99 state legislative chambers in the United States, I will identify those chambers in which quorum requirements are endogenous and those chambers in which quorum requirements are exogenous.

In each chamber where the quorum requirement is endogenous, I will identify the proportion of the legislative chamber constituting a quorum. I will then contrast those rules with the partisan composition of the state legislature in question. The partisan composition will be evaluated over time, for each election from 2010 through 2020, in order to ascertain not only the size of the majority but also the consistency with which that size of a majority is returned.

I will further examine those chambers in which quorum rules are exogenous and the quorum requirements have persistently remained higher than a simple majority. I will attempt to identify those veto points involved in exogenous rule changes, with particular attention to those veto points promoting preservation of the minority’s political impact. Because I hypothesize that rules will not be changed in states where the Constitutional amendment procedure provides minoritarian checks on the power of the majority, a thorough examination of the amendment procedures is essential. Consistency of majority size is of crucial importance, particularly for the proper evaluation of hypotheses 2B and 2C, so that the strategic position of each party relative to rule requirements may be ascertained.

Data will be gathered from publicly available sources, including, but not limited to, the web site of each state legislature, each state’s Secretary of State, and the National Conference of State Legislatures. This paper will examine general quorum rules for the completion of legislative business and will not focus on special rules for designated tasks or subject matter, whether they appear in rule or in constitution. To address each nuance of rule would create additional categories of state rules and limit comparability between states. For the purposes of this study, the provision adopted for the general business of the chamber will be interpreted to be the threshold agreed to be appropriate for the achievement of legislative ends.

**Results**

The overwhelming majority of US states have chosen to locate their quorum requirements in their state constitutions. A significant majority of states have chosen to set their constitutional quorum requirement at a simple majority. Vermont is a special case, in which its constitution generally requires a quorum of a simple majority but specifies that for matters relating to the sales tax the quorum is three-fifths. For the purposes of this study, as outlined in the methodology section above, I will disregard these special provisions for the consideration of the sales tax.

The outliers in this study are Indiana, North Carolina, Oregon, Tennessee and Texas. North Carolina represents the only state in which the quorum requirement is not set in the state’s constitution, while Indiana, Oregon, Tennessee and Texas each set their constitutional quorum requirements higher than a simple majority. These ten cases in five states provide the opportunity to test the four detailed hypotheses of this paper. Hypothesis one, relating to strictly endogenous legislative quorum requirements, may be tested using the Senate and House of Representatives of North Carolina. Hypotheses 2A, 2B, and 2C may be tested on the Senate and House of Representatives in Indiana, Oregon, Tennessee and Texas.

*Hypothesis 1: North Carolina*

To analyze hypothesis 1, additional information about state legislative elections is required. In North Carolina, state legislative elections consistently return Republican majorities. In no election in the last ten years have Democrats gained the majority in the state legislature, though North Carolina elected a Democratic governor in 2016 and 2020. The Republican legislative majority is occasionally more than two-thirds in the Senate, but in the past ten years it has not been more than two-thirds in the House.

*Hypothesis 2: Indiana, Oregon, Tennessee and Texas*

To analyze Indiana, Oregon, Tennessee and Texas with respect to hypothesis 2A additional information regarding each state’s constitutional amendment process is required; to analyze each state with respect to hypotheses 2B and 2C, data on state legislative election results will be required.

In Indiana, state legislative elections routinely return Republican majorities in excess of the two-thirds constitutional quorum requirement. In each election from 2010 to the present, a two-thirds republican majority has been elected to the House of Representatives; in each election from 2012 to the present, a two-thirds Republican majority has been elected to the Senate. The Indiana Constitution may be amended if a simple majority in each chamber of the legislature approves of an amendment; their proposal is subsequently referred to the people, and if it is ratified by a majority of voters, the Constitution is amended. Assuming the partisan breakdown of legislative seats is reasonably proportional to the partisan adherence of voters in the state, there is no provision in the constitutional amendment process that would give additional power to the partisan minority beyond the quorum requirement itself.

In Oregon, state legislative elections routinely return Democratic majorities smaller than the two-thirds majority constitutionally required to command a quorum. While Republicans have not won outright control of a chamber in more than a decade, the two parties did split power equally in the House of Representatives in 2011 and 2012. The Oregon Constitution provides two mechanisms by which the constitution may be amended. First, if a constitutional amendment addressing one subject is supported by the majority of both houses of the legislature, it will be referred to the people for a vote; a revision dealing with more than one subject of constitutional amendment will be referred to the people if it achieves a two-thirds majority vote in each chamber. The second mechanism is the constitutional initiative. If the Secretary of State receives signed petitions from eight percent of those people who voted in the previous gubernatorial election attesting they wish a particular amendment to be placed on the ballot, the amendment will be considered at the next election. Due to Oregon’s constitutional initiative process, it need not be assumed that its state legislative districts result in chambers that are relatively proportional to the partisan breakdown of the state; even should amendment by legislative proposal be restrained by an absconding minority, the constitutional initiative preserves the power of the popular majority in Oregon.

In Tennessee, state legislative elections routinely return Republican majorities in excess of the two-thirds constitutional requirement for a quorum. In each election since 2012, Republicans have won more than a two-thirds majority in both the House and Senate. To amend the Tennessee Constitution, multiple votes must be taken in both legislative chambers. First, a simple majority must approve of the proposed amendment in each chamber; the amendment will be tabled until a regularly scheduled legislative election. Then, in the subsequent legislative session, the amendment must be approved of by two-thirds of each legislative chamber. Once this second legislative hurdle has been surmounted, the amendment must be referred to the people during a gubernatorial election and will be adopted into the constitution if approved of by a majority of the voters in that gubernatorial election. This multi-stage legislative vote with an additional two-thirds approval requirement, in addition to the two-thirds quorum requirement itself, preserves minority power in the constitutional amendment process in Tennessee.

In Texas, despite its blood red reputation, state legislative elections routinely return a Republican majority that, while significant, is always slightly below the two-thirds majority constitutionally required for a quorum in that state’s legislative chambers. In Texas, constitutional amendments must be approved by two thirds of each chamber of the legislature, and subsequently approved of by a majority of voters. This requirement, in addition to the two-thirds quorum requirement itself, preserves minority power in the constitutional amendment process in Texas.

**Discussion**

In the overwhelming majority of cases, the simple majority quorum requirement is found in the state constitution. Without further study into the origin of the quorum requirement in each case, it is difficult to say if partisan strategy was the determining factor in the development of these requirements, or if a simple majority requirement was merely a convenient choice at the inception of each state’s constitution. However, as predicted, the majority required to conduct legislative business and the majority required to enact a legislative agenda are harmonized.

In cases where legislative quorum requirements are purely endogenous and require no further intervention than a vote by a chamber at the beginning of a session, hypothesis 1 may be considered to be confirmed by the data. North Carolina is the only state where quorum requirements for legislative business are not constitutionally established, and both chambers of the North Carolina Legislative Assembly set their quorum requirements at a simple majority. With only two chambers available to prove or disprove the hypothesis, its explanatory power may be limited; however, it is explanatory in every case that meets the parameters of the hypothesis.

Hypothesis 2A is explanatory in the case of Texas and might be interpreted as partially explanatory in the case of Tennessee. In Texas case, the legislative minority is given veto power over constitutional amendments through Constitutional requirement that any amendment be passed by each chamber by a two-thirds vote, empowering Texas Democrats to retain their ability to block legislative progress by denying Republicans a quorum. In Tennessee, the state constitution retains a two-thirds requirement at one stage of the legislative vote on proposed constitutional amendments; however, because Tennessee republicans consistently hold a majority greater than two-thirds, Tennessee could more reasonably be seen to confirm hypothesis 2C than 2A. This hypothesis is not borne out at all in Indiana, Oregon, or Tennessee. In Indiana and Oregon, no more than a simple majority is required in both the legislative chambers and the public.

In no case is hypothesis 2B explanatory. None of the four legislatures in which a constitutional quorum is greater than a bare majority routinely see swings between parties for control of the legislature. The closest case is Oregon’s split control of the House of Representatives in 2011; however, Democrats have held control of both chambers in every subsequent election. In each of the other three cases, Republicans hold consistent majorities in both chambers.

In half of all applicable cases, hypothesis 2C is confirmed. In both Indiana and Tennessee, Republicans have won both chambers of those legislatures with more than the two-thirds majority necessary to secure a quorum without any Democratic cooperation. The probability that a sufficient number of Republicans would defect and cooperate with Democrats to bring the business of the legislature to a halt is low. Therefore, there is little incentive for Republicans in those states to seek a constitutional amendment lowering the quorum requirement. In the remaining cases; however, the majority is not sufficient to overcome the quorum requirement without cooperation from the opposition party. It is no coincidence, then, that the two recent examples cited in the introduction to this paper happened in these two states, Oregon and Texas. In those two states, the hypothesis is not supported.

**Conclusion**

With such limited cases, it is difficult to argue that any hypothesis is confirmed. However, the results do indicate that, when legislators have the ability to determine their rules with no interference from a constitutional provision, they will establish quorum requirements not in excess of the majority of the majority party. It is what the literature would lead one to expect, and upon investigation the data does not contradict those expectations in the two chambers where legislative quorum requirements are purely endogenous.

Furthermore, it seems reasonable to say that two-thirds quorum rules will persist when legislative elections routinely produce a majority party in control of more than two thirds of the seats. Two-thirds quorum rules in Indiana and Tennessee persist because there is no reason to expend effort or capital on their repeals. Because they do not impact legislative business, Republican majorities in these legislatures may carry on as if the requirements did not exist. It seems reasonable to say that Texas’s quorum requirement survives because Republicans in the Texas legislature do not have the votes to remove it. Ironically, should they have the two-thirds majority necessary for a constitutional amendment, they would find themselves in the same position as Indiana and Tennessee; however, given Texas’s tendency to return a majority of smaller than two thirds, I would predict that should Texas Republicans ever have a sufficient majority in both Houses, this provision would be removed from Texas’s constitution. No hypothesis explains the experience of Oregon, and no hypothesis alone explains why all four states retain higher quorum requirements. What this study appears to confirm, however, is that legislators are strategic actors who will alter their procedural environment to their strategic advantage, unless a structural barrier or countervailing incentive deters them from doing so.

Opportunities for further study of this phenomenon are manifold, beyond the categorical need for greater research into state rules of legislative procedure. This essay has not considered the historical evidence available on the adoption of either the simple majority or two-thirds quorum requirement. A researcher could mine the historical record for evidence of rationale behind adoption of simple majority or two-thirds majority quorum requirements. Indiana, Oregon, Tennessee and Texas have had these constitutionally mandated quorum requirements since each state developed its constitution (Squire, 2013, p. 113). Evidence of amendment from two-thirds to simple majority requirements would be particularly useful, as would evidence of any constitutional convention’s decision to avoid a two-thirds quorum requirement. This study might further be expanded to subject-matter specific quorum rules. By identifying states using such rules and the rationale behind them, a researcher might better understand the policy areas in which legislators or constituents expect a supermajority’s consent to a change in policy, despite the marked advantages in maintaining simple majority quorum requirements. Expanding our understanding of the motivation behind the development of legislative rules will help us understand the purpose they serve for legislators.

Furthermore, this paper does not consider other explanations for the retention of two-thirds quorum requirements that would be better served through survey-based methodologies. This paper does not consider that, where two-thirds quorum requirements persist, either legislators or voters might have some special interest in preserving legislative rules beyond partisan advantage. If, as noted by Squire, a legislature has a long history of a particular rule that presents disadvantage to the policy goals of a majority party, might it be so much a part of the state’s political culture that actors preserve it against their own self-interest? Such a proposition might be testable through a survey of the decision makers involved and, if confirmed, would present interesting evidence of norm preservation overcoming simple cost-benefit analysis. Finally, this paper finds no explanation for the persistence of a two-thirds quorum requirement in Oregon. As the unexplained outlier, an investigation into what factors, if any, inform Oregon’s retention of the two-thirds constitutional quorum requirement in spite of the availability of a constitutional amendment mechanism that could circumvent Republican intransigence. Another elite survey may be the best method by which to ascertain the nuances of rule, norm, and culture limiting changes to procedure in the state. However, barring further investigation developing contrary data, I conclude that, if provided the opportunity and incentives to do so, partisan majorities will act to preserve their legislative advantage by developing quorum rules that further their legislative agendas.

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