In the case of loans, where the borrower bears the entire cost of the facility, it is particularly clear that government is without authority to require the banishment of the religious aspects of education. The national purpose is satisfied when the students learn what the government reasonably requires them to learn. It is not frustrated when they also learn their religious heritage.

Scholarships, based on merit and need, have been a frequent instrument for promoting educational excellence by the national and state governments. They exist on both the college and the high school level. Significantly, scholarship programs have carefully respected the student's and parents' freedom to choose any accredited educational institution and to study any subjects offered in that institution. No better example of the extravagant extremes to which some factions wish to push the separation of church and state can be found than in the attempts during the last Congress to limit the freedom of choice of scholarship winners both as to the institutions attended and the subjects studied. Religion, it would seem, is no longer a part of human culture.

Tuition grants differ from scholarships in being based not on merit but on some obligation of the government to provide education. At the state level, some state constitutions have limited tuition payments to public and nonsectarian schools.[110] At the federal level, the situation is quite different. Page boys in Congress and the Supreme Court receive tuition grants from the federal government which may be applied either to a public or any private school.[111] If Congress may give this freedom of choice to federal employees, it is difficult to see why Congress may not extend it to federal taxpayers. It would be a paradox, indeed, were the separation of church and state to mean that scholarship winners or federal employees may attend church-related schools, but that no one else may.

110 Cf. Almond v. Day, 197 Va. 419, 89 S.E.2d 851 (1955); Swart v. South Burlington Town School Dist., 122 Vt. 177, 167 A.2d 514 (1961), cert. denied sub nom. Anderson v. Swart, 366 U.S. 925 (1961). In these cases both courts found a prohibition of tuition payments to sectarian schools in both the federal and the local constitutions. In this connection, it should be carefully noted that most state cases invalidating state aid to education in church-related schools have been decided not on the first and fourteenth amendments, but on far more restrictive and specific prohibitions in the local constitutions. See, e.g., Matthews v. Quinton, 362 P.2d 932 (Alaska 1961), appeal docketed, Misc. Docket No. 762, U.S. Sup. Ct., Nov. 25, 1961; Dickman v. School Dist. No. 620, Ore. Sup. Ct., Nov. 14, 1961. *Matthews* involved bus transportation; *Dickman* dealt with textbooks.

111 60 Stat. 839 (1946), 2 U.S.C. § 88(a) (1958).