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# The Secular Benefits of Comparative Religious Education

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## THE SECULAR BENEFITS OF COMPARATIVE RELIGIOUS EDUCATION

*Wen Jie (Fred) Tan<sup>1</sup>*

**T**he peal from the gong of a Buddhist temple; the adhan from the minaret calling men to prayer; the ring from the church bell tower—these melodies, rooted in religion and its practices, are tunes that many equate with feelings of peace and freedom from worldly cares.<sup>2</sup> However, society also associates religion with conflict. From the highly controversial burqa ban to abortion and from LGBT rights to acts of terrorism perpetrated by extremists, many issues can be seen as a battle of the religious versus the non-religious. These issues are usually complicated by a legal system perceived to be unfair,<sup>3</sup> and a lack of understanding on both sides,<sup>4</sup> typically resulting in the infringement of one or more parties' religious freedom.

Most countries in the world support religious freedom, or at least claim to do so. In fact, the United Nations emphasized the importance

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  - 2 ROBIN SYLVAN, *TRACES OF THE SPIRIT: THE RELIGIOUS DIMENSIONS OF POPULAR MUSIC 19–45* (2002).
  - 3 B. Salawu, *Ethno-Religious Conflicts in Nigeria: Causal Analysis and Proposals for New Management Strategies*, 13 *EUR. J. SOC. SCI.* 346–48 (2010).
  - 4 BENJAMIN J. KAPLAN, *DIVIDED BY FAITH: RELIGIOUS CONFLICT AND THE PRACTICE OF TOLERATION IN EARLY MODERN EUROPE*, 78 *J. AM. ACAD. RELIG.* 564 (2010).

of religious freedom in its Universal Declaration of Human Rights and in the International Covenants on Human Rights,<sup>5</sup> a document ratified by almost all United Nations member states. However, despite such proclamations professing support for the sanctity of religious freedom, religious conflicts are on the rise.<sup>6</sup>

Taking into account the history and importance of religious freedom, this paper will argue the need for and feasibility of comparative religious study integrated into public education and mandated by the government. As such, this paper will be structured in the following way: first, it will provide a theoretical framework exploring the idea of religious freedom. This section will highlight, through several international charters and conventions, why and how religious freedom cannot exist in its entirety without religious understanding. Second, it will show how a policy of comparative religious study does not infringe on a secular nation or government. America's public schools will be the focus in this paper, because America is a country with a legal system that cannot only accommodate such a policy of comparative religious study but also allow it to thrive. Third, the paper will provide an analysis of the benefits of comparative religious education. Fourth, this paper will provide a description of how such a policy has been implemented in Modesto, California.

## I. CONNECTION BETWEEN FREEDOM AND UNDERSTANDING

### A. *History of Religious Freedom*

Article 18(1) of the International Covenant on Civil and Political Rights, an article officially recognized by the US Department of State as a working definition for religious freedom, provides a more specific description of what religious freedom entails:

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5 Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 at 71 (1948).

6 *Religious Hostilities Reach Six-Year High*, PEW RESEARCH CENTER, RELIGION AND PUBLIC LIFE (Jan. 14, 2014), <http://www.pewforum.org/2014/01/14/religious-hostilities-reach-six-year-high/>.

Everyone shall have the right to freedom of thought, conscience, and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice, and teaching.<sup>7</sup>

Several other treaties, charters, and declarations help define religious freedom and stress its importance. Of course, not all human rights charters and declarations are legally binding, but they do provide the framework and foundation upon which international laws, specifically laws relating to human rights are developed<sup>8</sup> and as such these charters influence nations' policies.<sup>9</sup> Through a chronological examination of these charters and declarations, we can understand on a theoretical level the way religious freedom is viewed internationally and how a level of religious understanding is needed before freedom can prevail. This list is in no way exhaustive but rather representative of the most significant treaties dealing with human rights and religious freedom.

The first treaty that played a significant role in establishing international law and religious freedom is the Peace of Westphalia signed in 1648. It is often said that the modern concept of sovereign nation states stemmed from the end of the Thirty Years' War and the creation of the Treaty of Westphalia.<sup>10</sup> The Thirty Years' War was predominantly a religion-fueled conflict due to the mutual

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7 International Covenant on Civil and Political Rights, Dec. 16, 1966, S. Treaty Doc. No. 95-20, 6 I.L.M. 368 (1967), 999 U.N.T.S. 171.

8 *International Human Rights Law*, UNITED NATIONS HUMAN RIGHTS OFFICE OF THE HIGH COMMISSIONER, <http://www.ohchr.org/EN/ProfessionalInterest/Pages/InternationalLaw.aspx>.

9 Marko Divac Öberg, *The Legal Effects of Resolutions of the UN Security Council and General Assembly in the Jurisprudence of the ICJ*, 16 EUR. J. INT'L. L. 879 (2006).

10 Jason Farr, *Point: The Westphalia Legacy and the Modern Nation-state*, 80 INT'L. SOC. SCI. REV. 156 (2005).

misunderstanding between European Catholics and Protestants.<sup>11</sup> As such, the Peace of Westphalia, the peace agreement to end that war, stressed and defined the importance of religious freedom, specifically between European nations, so as to mitigate future catalysts for conflict. The need for religious equality was emphasized and calls were made for the protection of religious minorities.<sup>12</sup> To quote from *Article CXXIII*, signatories pledged that “the concluded Peace shall remain in force, and all Partys in this Transaction shall be oblig’d to defend and protect all and every Article of this Peace against any one, without distinction of Religion.”<sup>13</sup>

About three hundred years later, the Universal Declaration of Human Rights (UDHR) was adopted. The UDHR goes beyond an initial prescription that everyone should have the freedom of religion and the right to change religion to an assertion that “[e]ducation shall be directed to the . . . strengthening of respect for human rights and fundamental freedoms . . . [and] promote understanding, tolerance and friendship among all nations, racial or religious groups.”<sup>14</sup> This sentiment was once again reiterated in the 1960 Convention against Discrimination in Education and again in the 1981 Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief which states, “It is essential to promote understanding, tolerance and respect in matters relating to freedom of religion.”<sup>15</sup> To quash potential criticisms of how the aforementioned treaties are ideologically biased towards the history, demography, and legal framework of the West, similar declarations were

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- 11 Peter H. Wilson, *The Causes of the Thirty Years War 1618–48*, 123 ENGL. HIST. REV. 554 (2008).
  - 12 Gordon A. Christenson, *Liberty of the Exercise of Religion in the Peace of Westphalia*, 21 U. CIN. FAC. ARTICLES & OTHER PUBLICATIONS 722 (2012).
  - 13 Treaty of Westphalia, art. CXXIII, Oct. 24, 1648, [http://avalon.law.yale.edu/17th\\_century/westphal.asp](http://avalon.law.yale.edu/17th_century/westphal.asp).
  - 14 Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 at 71 (1948).
  - 15 Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief, G.A. Res. 36/55, U.N. Doc. A/RES/36/55, (1981).

rectified by the African Union in 1981<sup>16</sup> and the Arab League in 1981<sup>17</sup> and 1994.<sup>18</sup>

A review of these treaties and declarations points towards three facts: first, religious freedom is a human right. It is universal and not culturally exclusive. Second, the common consensus throughout several international charters is the need for a conscious policy effort to foster freedom and understanding through education. Third, for the Machiavellian population who believes in progress at the cost of freedoms, these declarations highlight the tangible benefits of religious freedom. In particular, ensuring and promoting the idea that “freedom of religion and belief should also contribute to the attainment of the goals of world peace, social justice and friendship.”<sup>19</sup>

While international charters and treaties clearly draw the link between religious freedom and the need for religious understanding, this has not been established in the American context. Within America, the importance of freedom, which religious freedom is a subset of, is undisputed.<sup>20</sup> However, current literature on how education and understanding can increase religious freedom in America is sparse. Little has been done to show the secular need for, or benefit of, religious education. All these problems exist despite America having the legal framework needed to support and promote policies of religious education to ensure freedom. In this paper, these deficiencies in the literature will be exploited and this nexus within America will be examined.

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16 African Charter on Human and Peoples’ Rights, art. 2, 8, 12, Jun. 1981, <http://www.achpr.org/instruments/achpr/>.

17 Universal Islamic Declaration of Human Rights, art III, IX, X, XII, XIII, XIV, XIX, Sep. 19, 1981, [http://hrlibrary.umn.edu/instree/islamic\\_declaration\\_HR.html](http://hrlibrary.umn.edu/instree/islamic_declaration_HR.html) - religion.

18 Arab Charter on Human Rights, art 2, 27, 35, 37, Sep. 15, 1994, <http://hrlibrary.umn.edu/instree/arabcharter.html>.

19 Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief, G.A. Res. 36/55, U.N. Doc. A/RES/36/55, (1981).

20 U.S. CONST. amend. I.

### B. The American Context

In 1802, Thomas Jefferson, in an address to the Danbury Baptist Association and in a subsequent publication in Massachusetts, said, “I contemplate with sovereign reverence that act of the whole American people which declared that their legislature should ‘make no law respecting an establishment of religion, or prohibiting the free exercise thereof,’ thus building a wall of separation between Church & State.”<sup>21</sup>

Jefferson’s statement has been used in arguments to deny any collaboration between the church and state.<sup>22</sup> Supreme Courts have grappled to solidify a yardstick of appropriate separation between church and state.<sup>23</sup> *Everson v. Board of Education*<sup>24</sup> in 1947 was the first major case where the court tried to determine how high and wide this wall separating church and state should be. The *Lemon Test*,<sup>25</sup> established in 1971, is the primary method by which the Court now decides if laws and practices relating to religion are constitutional or if they violate the Establishment Clause of the Constitution

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21 Thomas Jefferson, *Letter to the Danbury Baptists* (Jan. 1, 1802), <https://www.loc.gov/loc/lcib/9806/danpre.html>.

22 Milton R. Konvitz, *Separation of Church and State: The First Freedom*, 14 L. & CONTEMP. PROBS. 44 (1949).

23 Wilber G. Katz, *Freedom of Religion and State Neutrality*, 20 U. CHI. L. REV. 426 (1953).

24 *Everson v. Board of Education*, 330 U.S. 1 (1947). This was a landmark case during which Arch R. Everson argued that the state of New Jersey providing reimbursement for parents transporting their children to school, with tax money in a city where 96 percent of schools were private Catholic institutions, constituted the state’s support of religion and thus violated the First Amendment and the Due Process Clause of the Fourteenth Amendment. By a 5-4 decision, it was determined that the reimbursements were constitutional since they were a benefit open to people from all religions. Despite this decision, enormous ambiguity regarding the appropriate relationship between the church and state still exists as embodied in Justice Wiley Rutledge’s dissenting opinion that “[t]he Court does not dispute nor could it that their use does in fact give aid and encouragement to religious instruction. It only concludes that this aid is not ‘support’ in law.”

25 *Lemon v. Kurtzman*, 411 U.S. 192 (1973).

through a three-pronged analysis: first, laws must have a secular purpose. Second, extending beyond a law's purpose, implemented legislation must result in a predominantly secular effect. Third, enacted laws must not foster "excessive entanglement" between government and religion. In other words, the *Lemon Test* dictates that there is, in fact, room for religious institutions, or influences, to interact with the state as long as the interactions fulfill the three requirements laid out.

From determining that prayers at school functions were unconstitutional<sup>26</sup> to concluding that religious clubs should be allowed to operate in public schools,<sup>27</sup> the ruling of *Everson v. Board of Education* and the *Lemon Test* have helped to further define the ambiguous wall separating church and state. While most cases regarding religious freedom are put through the *Lemon Test*, it is important to recognize that there exist exceptions when the court came to a decision without using the test.<sup>28</sup> Our proposal of comparative religious education will be subjected to the *Lemon Test*, and proven to be constitutional, with two exceptions accounted for during our arguments.

Within America, comparative religious education will teach about the seven major religious classifications in America: Christianity, Judaism, Islam, Buddhism, Hinduism, the unaffiliated (atheists and agnostics), and the religious others (e.g., Humanists, Scientologists).<sup>29</sup> Because the US Census does not collect data about the American people's religious beliefs, these seven classifications have been directly derived from independent surveys conducted by the Pew Research Center reflecting religious trends in America.

Such a comparative education will not teach religion, but teach about religion. This preserves the neutrality of secular nations and governments. In showing how comparative religious education can be implemented by secular nations and governments, the following sections will (1) highlight in precedent the areas of exceptions in the

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26 Lee v. Weisman, 505 U.S. 577 (1992), Santa Fe Independent School District v. Doe, 530 U.S. 290 (2000).

27 Good News Club v. Milford Central School, 530 U.S. 98 (2001).

28 Marsh v. Chambers 463 U.S. 783 (1983).

29 *Religious Landscape Study*, PEW RESEARCH CENTER, RELIGION AND PUBLIC LIFE (2015), <http://www.pewforum.org/religious-landscape-study/>.

American legal system where religion and the state can intersect and (2) prove that our model of comparative religious education fits into these areas of exceptions due to the overwhelming secular benefits it brings to society.

## II. POLICY OF COMPARATIVE RELIGIOUS EDUCATION IN AMERICA

### *A. Space in the American Legal System—Within the Lemon Test*

This section examines several specific cases where it was determined, through the *Lemon Test*, that the government's interactions with religion were constitutional. An example will also be provided illustrating how the government is able to interact with religion in a way that circumvents the parameters established by the *Lemon Test*. Through this examination, it will be shown how a policy of comparative religious education, integrated into public education and mandated by the government, falls within the current framework of the American legal system.

For cases that the government's interactions with religion were deemed constitutional after an application of the *Lemon Test*, the ruling was because government policy was seen to be supporting a secular and not a religious good. Three such court cases will be highlighted: *Zobrest v. Catalina Foothills School District* (1993), *Mitchell v. Helms* (2000), and *Zelman v. Simmons-Harris* (2002). These three cases are featured because they deal with government funding, religion or religious institutions, and the public. Three elements present and affected by our policy of compulsory comparative religious study.

First, in *Zobrest v. Catalina Foothills School District*, the parents of James Zobrest, a deaf student, elected to send their son to a Roman Catholic high school. Upon entering the new high school, the Zobrest family requested the school board to provide a sign-language interpreter for James, just as his public middle school had in the past. The school board rejected the request on the justification that such an allocation of resources would be unconstitutional. The District Court agreed with the school board's judgement on the grounds that such an action would promote the religious development of the child

using government resources and thus violate the *Lemon Test*. However, the Supreme Court expressed that such a provision of support was part of a government program for qualifying children with disabilities and was available regardless of whether a child went to a religious or secular, and private or public school. The Supreme Court further declared that because the benefit of this aid went directly to the affected student and family and not the religious school, such a use of government resources was constitutional.<sup>30</sup>

Second, the case *Mitchell v. Helms* highlights that government aid can be made available to religiously affiliated institutions as long as secular institutions are equally eligible for such benefits. The second chapter of the Education Consolidation and Improvement Act of 1981 provided federal funds to educational institutions such as public and private elementary and secondary schools. In Jefferson Parish, Louisiana, around the late 1990s, approximately 30 percent of such funds were allocated to private schools, many of which were Catholic institutions or otherwise religiously affiliated. Mary Helms, a public school parent, together with others filed suit asserting that that such a disbursement of funds constituted a violation of the First Amendment. While the District Court ruled in favor of Helms that such aid was unconstitutional, the Supreme Court decided that merely providing aid to private schools that were religiously affiliated did not violate the Establishment Clause. Justice Thomas wrote that “[i]f the religious, irreligious, and areligious are all alike eligible for governmental aid, no one would conclude that any indoctrination that any particular recipient conducts has been done at the behest of the government.”<sup>31</sup>

Third, in *Zelman v. Simmons-Harris*, a pilot-project scholarship program based in Ohio at the beginning of the 2000s provided vouchers of up to \$2,250 a year to eligible students mostly from financially needy families. These vouchers were to be used to pay for a student’s enrollment in participating schools. During the years 1999 and 2000, 82 percent of private schools were religiously affiliated, and 96 percent of students in the program were enrolled in such

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30     Zobrest v. Catalina Foothills School District, 509 U.S. 1 (1993).

31     Mitchell v. Helms, 530 U.S. 793 (2000).

private religious schools. Simmons-Harris along with other residents around Cleveland filed suit against Zelman, the superintendent of public education in Ohio, arguing that such a financial sponsorship for students to attend religious institutions was unconstitutional. The Supreme Court decided however that Ohio's policy did not violate the First Amendment. The government aid was directed to the individual and not the institution. Furthermore, the enrollment of students into private religious schools was a result of individual choice and not of government endorsement.<sup>32</sup>

In these three cases, common themes can be observed. First, funding that benefits the individual and not religious institutional growth is acceptable. Second, funding towards religious institutions is acceptable if it is also available to secular institutions and if it be for secular benefits. Third, funding is allowed if it does not signal government endorsement of religion. A Common Core comparative religious study of major religious groups in America that requires government funding but teaches about the culture of people and not a promotion of theology falls neatly into these three areas of exceptions and thus is constitutional. This policy will bring secular benefits to the individual and to society at large. These benefits will be elaborated on in the latter section of this paper.

### *B. Without the Lemon Test*

Under the updated ruling of *Agostini v. Felton*, the *Lemon Test's* requirement that a law does not result in excessive entanglement is irrelevant when distributing aid to schools both religious and secular.<sup>33</sup> *Marsh v. Chambers* displays how practices that are historical customs and "part of the fabric of our society" do not need to be scrutinized under the *Lemon Test* at all.<sup>34</sup> While comparative religious education can hardly be considered a historical custom of the United States, this case highlights that there are instances when the *Lemon Test* can be abandoned altogether. A more recent way by

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32 Zelman v. Simmons-Harris, 536 U.S. 639 (2002).

33 Agostini v. Felton, 521 U.S. 203 (1997).

34 Marsh v. Chambers, 463 U.S. 783 (1983).

which the government can circumvent all three requirements of the *Lemon Test* altogether is executive action.

### *C. Office of Faith-Based Initiatives*

In 2001, President George W. Bush announced the creation of the Office of Faith-Based and Community Initiatives (OFBCI) through an executive order.<sup>35</sup> The OFBCI, now known as the White House Office of Faith-Based and Neighborhood Partnerships, was established to strengthen and enlarge faith-based organizations' (FBO) ability to provide social services<sup>36</sup> and to direct them to potential federal funding opportunities.<sup>37</sup>

Several guidelines were established to avoid violations of the establishment clause:

- FBOs are eligible to compete for funding on the same basis as other nonprofit organizations.
- FBOs may not use direct government funds to support inherently religious activities such as prayer, worship, religious instruction, or proselytization. Any inherently religious activities must be offered separately in time or location from services directly funded with government assistance and must be voluntary for participants.
- FBOs cannot discriminate on the basis of religion or religious belief in providing services to clients.<sup>38</sup>

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35 *White House Faith-Based and Community Initiatives*, THE WHITE HOUSE, <https://georgewbush-whitehouse.archives.gov/government/fbci/> (last visited Feb. 10, 2017).

36 *White House Faith-Based and Neighborhood Partnerships*, THE WHITE HOUSE, <https://obamawhitehouse.archives.gov/administration/eop/ofbnp> (last visited Feb 11, 2017).

37 *White House Faith-Based and Neighborhood Partnerships – Grants and Resources*, THE WHITE HOUSE, <https://obamawhitehouse.archives.gov/administration/eop/ofbnp/resources> (last visited. Feb. 10, 2017).

38 *Improvements in Monitoring Grantees and Measuring Performance Could Enhance Accountability*, UNITED STATES GOVERNMENT ACCOUNTABILITY OFFICE, (2006), <http://www.gao.gov/new.items/d06616.pdf>.

However, as part of OFBCI, several executive departments were directed to hold conferences to promote such faith-based social service initiatives. In 2006, the Freedom from Religion Foundation sued on the grounds that such conferences favored religious institutions and thus violated the Establishment Clause. The Supreme Court however ruled that citizens, in their status as taxpayers, do not have the right to bring Establishment Clause suits against programs sponsored by the Executive Branch.

Thus, here lies another area of exception in which a Common Core comparative religious study can exist. Policies sponsored by the Executive Branch are not scrutinized by the usual standard of the *Lemon Test*.

### III. SECULAR BENEFITS OF COMPARATIVE RELIGIOUS EDUCATION

We have, thus far, highlighted what governments can and cannot do with regards to religion. However, because of the clear consensus that governments are able to interact with religion if the interaction promotes secular benefits and does not result in the state sponsoring religious activities, it would be wise to elaborate on the overwhelming secular advantages that a mandated comparative religious education brings. These advantages go beyond a mere increase in religious freedom, despite the fact that such an increase is desirable, commendable, and significant. No, the benefits that will be described in this section are tangible, measurable, and unignorable.

#### *A. National Security*

The 1963 Supreme Court case *School District of Abington Township, Pennsylvania v. Schempp* determined that daily Bible readings and recitations of the Lord's Prayer was unconstitutional in public schools.<sup>39</sup> While the wall separating church and state was raised as a result of this ruling, many glance over a significant statement that stemmed from this case. Justice Clark, delivering the opinion of the court, declared that "one's education is not complete without a study

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39 *Abington v. Schempp*, 374 U.S. 203 (1963).

of comparative religion or the history of religion and its relationship to the advancement of civilization.<sup>740</sup> Scholarly research corroborates Justice Tom Clark's belief in the importance of a comparative religious education.

Justice Clark commented that a study of religious texts is beneficial due to their rich literature and historical value.<sup>41</sup> While we agree with his assessment, the advantages of a comparative religious study extend beyond those two values. Such a comparative education is also necessitated by the unique sociopolitical situation of the day.

Contrary to decades-old theory and popular belief that as society becomes increasingly educated it becomes less religious, the world in general is actually becoming increasingly desecularized.<sup>42</sup> America, however, bucks this global trend with a slight decrease in its level, and predicted level, of overall religiosity.<sup>43</sup> Despite this downward trajectory, the number of Evangelical Christians in America is on the rise.<sup>44</sup> Furthermore, among the irreligious population of America, a growing percentage of people confess that spirituality plays a crucial role in their lives.<sup>45</sup> Whether religion in America is on the rise or decline, what can be observed is an increasingly pluralistic society with diverse beliefs—a society where religion and spirituality plays a role in the everyday lives of many people. Pluralism is then exacerbated by a strong immigrant presence while in the

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40 *Id.*

41 *Id.*

42 PETER L. BERGER, *THE DESECULARIZATION OF THE WORLD: A GLOBAL OVERVIEW - THE DESECULARIZATION OF THE WORLD: RESURGENT RELIGION AND WORLD POLITICS 2* (1999).

43 *U.S. Public Becoming Less Religious*, PEW RESEARCH CENTER, (2015), <http://www.pewforum.org/2015/11/03/u-s-public-becoming-less-religious/>.

44 *America's Changing Religious Landscape*, PEW RESEARCH CENTER, RELIGION AND PUBLIC LIFE (2015), <http://www.pewforum.org/2015/05/12/americas-changing-religious-landscape/>.

45 *Id.*

meantime, members of society struggle to reconcile themselves with a multitude of diverse beliefs.<sup>46</sup>

The argument has been made that Western society contains a strong culture closely linked to Christian tradition and philosophy that is dangerous to ignore.<sup>47</sup> Some view an increasing religious and cultural diversity in America as a threat to principles of democracy.<sup>48</sup> On the flip side, immigrants and others from ethnic and religious minorities fear that their tradition and religious beliefs will be trivialized and trampled upon in a predominantly Western society.<sup>49</sup> On both sides of the spectrum, ineffective and inaccurate understanding of diverse religions catalyzes conflicts such as those highlighted at the start of this paper.

The implementation of comparative religious education alleviates this tension and misunderstanding. First, social tolerance and harmony is nigh impossible without a decrease in stereotypes and an increased understanding of people's motivation for action.<sup>50</sup> Comparative education about religions allows for an observation of similar themes, values, and philosophies among different beliefs.<sup>51</sup> This humanizes the religious others and enables the community to focus on shared similarities while understanding the cause of differences, thus promoting harmony in society.<sup>52</sup>

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- 46 GEIR SKEIE, INTERNATIONAL HANDBOOK OF THE RELIGIOUS, MORAL AND SPIRITUAL DIMENSIONS IN EDUCATION VOLUME 1 OF THE SERIES INTERNATIONAL HANDBOOKS OF RELIGION AND EDUCATION: PLURALITY AND PLURALISM IN RELIGIOUS EDUCATION, 307-319 (2007).
- 47 John Haldane, *Religious Education in a Pluralist Society: A Philosophical Examination*, 34 BRIT. J. EDUC. STUD. 161 (1986).
- 48 Robert Wuthnow, *America and the Challenges of Religious Diversity*, (4th ed. 2007).
- 49 Robert Jackson, *Rethinking Religious Education and Plurality: Issues in Diversity and Pedagogy*, (1st ed. 2004).
- 50 Ali Majokah, *Comparative Religious Education and its Role in Creating a Harmonious Society*, 21 Australian Mosaic 32 (2009).
- 51 Mircea Eliade, *Patterns in Comparative Religion*, (1st ed. 1996).
- 52 Konvitz. *Supra* note 22.

Second, be it radical Islamic terrorists, right-wing Christian extremists (a group responsible for more acts of terror within America than the stereotypical Muslim radical),<sup>53</sup> or another societal minority, religion is cited as a core motivation driving their actions. Yet, governments seem reluctant to acknowledge it and current policy seems ill-equipped to address it.<sup>54</sup> As religion-based grievances are left unexplored and unaddressed, minorities feel shunned from the community and find it hard to assimilate. This creates a cycle of isolationism which is cited as a core cause of radicalization.<sup>55</sup> Comparative religious education breaks this cycle by doing at least two things. First, it represents governmental recognition, not sponsorship, of religions and minority opinions. Because education plays a central role in the creation of a national identity,<sup>56</sup> comparative religious education and the recognition of minority religions and opinions represent a government's effort to integrate minorities into a shared national community,<sup>57</sup> thus reducing the risk of radicalization.

### *B. Economic Benefits of Religious Freedom*

Beyond benefiting national security, religion brings economic benefits to countries. In the face of a sluggish economy,<sup>58</sup> promoting religious freedom might be a good tool in a government's arsenal to

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- 53 National Consortium for the Study of Terrorism and Responses to Terrorism (START), *Global Terrorism Database [Data file]* (2015), available at <https://www.start.umd.edu/gtd/contact/>.
- 54 Jack Miles, *Religion and American Foreign Policy*, 46 SURVIVAL 23 (2004).
- 55 Milton Myron Gordon, *Assimilation in American Life: The Role of Race, Religion, and National Origins*, (6th ed. 1964).
- 56 Benedict Anderson, *Imagined Communities: Reflections on the Origin and Spread of Nationalism* (3d ed. 2006).
- 57 Deniz Kandiyoti, *Identity and its Discontents: Women and the Nation*, 26 AM. J. POLIT. SCI. 429 (1991).
- 58 World Bank Group, *Global Economic Prospects: Divergences and Risks* (2016), <http://pubdocs.worldbank.org/en/842861463605615468/Global-Economic-Prospects-June-2016-Divergences-and-risks.pdf>.

promote economic growth. A recent study reports that global faith-based organizations not only provide much needed services such as healthcare and education but also generate revenue of \$378 billion annually.<sup>59</sup> In America alone, the economic value of religion, its institutions, and its people amounts to \$4.8 trillion annually.<sup>60</sup>

Beyond mere numbers and statistics, the impact of religious freedom on the economy can and should be examined on a theoretical level. An increase in religious freedom results in a chain reaction of events that positively benefits the economy. Businesses decide the location and extent to which they should invest. As part of this decision making progress, multi-national corporations consider the level of political and economic risk in each potential country.<sup>61</sup> Greater political and economic risks negatively influence a country's local interest rates<sup>62</sup> and stock markets,<sup>63</sup> thus lowering the volume of direct foreign investment the country receives.<sup>64</sup> Because religious freedom affects a country's culture, climate, and domestic and foreign policies, businesses now integrate the level of religious freedom in a country as part of their risk analyses with higher levels of religious freedom equating to lower levels of country-specific risk and increased potential investment.<sup>65</sup> Further studies reflect that the decrease in social polarization and isolationism that results from an increase in common understanding and religious freedom increases

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59 Brian J. Grim & Melissa E. Grim, *The Socio-economic Contribution of Religion to American Society: An Empirical Analysis*, 12 INTERDISC. J. RESEARCH RELIG. 2 (2016).

60 *Id.*

61 Ilan Alon & Gregory Chase, *Religious Freedom and Economic Prosperity*, 25 CATO J. 399 (2005).

62 Bert Scholtens & Ramon Tol, *On the Co-Movement of Bond Yield Spreads and Country Risk Ratings*, 8 J. FIXED INCOME 1 (1999).

63 Claude B. Erb, Campbell R. Harvey & Tadas E. Viskanta, *Political Risk, Economic Risk and Financial Risk*, 52 FINANC. ANAL. J. 29 (1996).

64 Robert Grosse & Len J. Trevino, *Foreign Direct Investment in the United States: An Analysis by Country of Origin*, 1996 J. INT'L BUS. STUD. 139.

65 Ilan Alon & John Spitzer, *Does Religious Freedom Affect Country Risk Assessment?*, 10 J. INT'L AREA STUD. 51 (2003).

economic performance because of a decrease in rent-seeking behavior or unabashed exploitation of resources.<sup>66</sup> Thus an increase in religious freedom increases political and social stability and security which in turn reduces risk and positively affects economic freedom, and therefore results in greater economic prosperity.<sup>67</sup>

#### IV. CASE STUDY

Such a policy of comparative religious education was implemented in Modesto, California and yielded great results. California, like many other regions in America, has a high migrant population resulting in great demographic diversity. In Modesto, a trend was observed that immigrant communities tended to congregate together, forming small enclaves or safe havens based on ethnicity and religion.<sup>68</sup> However, isolation was not sustainable. Interactions between migrant minorities and the general community were inevitable; in fact, forced interaction occurred in schools.<sup>69</sup> Conflicts stemming from suspicion and misunderstandings ensued.<sup>70</sup>

As children entered public schools, migrant minorities had to leave the isolation of their ethnic enclaves and interact with the general community. In 1997, after several instances of religiously sparked, severe anti-gay harassment,<sup>71</sup> a town hall meeting comprising parents,

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66 William Easterly & Ross Levine, *Africa's Growth Tragedy: Policies and Ethnic Divisions*, Q. J. ECON. 1203 (1997).

67 Ilan Alon & Gregory Chase, *Religious Freedom and Economic Prosperity*, 25 CATO J. 399 (2005).

68 Emile Lester & Patrick S. Roberts, *How Teaching World Religions Brought a Truce to the Culture Wars in Modesto, California*, 31 BRITISH J. RELIG. EDUC. 187 (2009).

69 *Id.*

70 Emile Lester & Patrick S. Roberts, *How Teaching World Religions Brought a Truce to the Culture Wars in Modesto, California*, 31 BRITISH J. RELIG. EDUC. 188 (2009).

71 *Id.*

teachers, students, and religious leaders was convened.<sup>72</sup> The group eventually agreed that schools should be a safe zone, free from harassment, and be an environment of mutual respect despite disagreements.<sup>73</sup> With that, the school district decided to design a course on world religions.<sup>74</sup>

Modesto's course on comparative world religions began with a study of America's religious history that includes its founding and the establishment of the Constitution. In studying the First Amendment, students became aware of common rights available to all.<sup>75</sup> The remainder of the course took students through the study of religions as follows: Hinduism, Buddhism, Confucianism, Sikhism, Judaism, Christianity, and Islam.<sup>76</sup> These religions were covered according to the chronology of when they emerged in history, and content remained neutral.<sup>77</sup> Because theology and topics of controversy were not covered, religions were not judged against each other.<sup>78</sup>

Surveys and interviews indicated a significant increase in students' religious cultural understanding.<sup>79</sup> As such, levels of active and passive tolerance, or the avoidance of discrimination and protection against discrimination, increased.<sup>80</sup> Most remarkably however,

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72 Emile Lester & Patrick S. Roberts, *How Teaching World Religions Brought a Truce to the Culture Wars in Modesto, California*, 31 BRITISH J. RELIG. EDUC. 189 (2009).

73 *Id.*

74 *Id.*

75 *Id.*

76 Emile Lester & Patrick S. Roberts, *How Teaching World Religions Brought a Truce to the Culture Wars in Modesto, California*, 31 BRITISH J. RELIG. EDUC. 190 (2009).

77 *Id.*

78 *Id.*

79 Emile Lester & Patrick S. Roberts, *How Teaching World Religions Brought a Truce to the Culture Wars in Modesto, California*, 31 BRITISH J. RELIG. EDUC. 195 (2009).

80 Emile Lester & Patrick S. Roberts, *How Teaching World Religions Brought a Truce to the Culture Wars in Modesto, California*, 31 BRITISH J. RELIG. EDUC. 196 (2009).

this mandated high school course on world religions has not been a subject of lawsuits or complaints but has gained acceptance in religiously diverse Modesto.<sup>81</sup>

In the creation of a course of comparative religious studies, we propose that the Modesto example be consulted as a good model for wider implementation. Four key elements should specifically be implemented. First, the content of the course will focus on history and culture, not theology or ideology, thus avoiding topics and events of controversy. Such a curriculum will reduce content bias and teachers' potential prejudice. Second, the course will be structured according to historical chronology to ensure neutrality. Third, each major religion will be afforded the same amount of time in class. Fourth, each teacher will undergo frequent and rigorous training to ensure educators remain impartial and able to deal with any controversy or contention that might arise during the course. By adhering to these strict standards, we believe that results similar to those seen in Modesto are possible if such comprehensive religion studies are implemented in public schools across America.

## V. CONCLUSION

Religious freedom is a fundamental right recognized by the international community and individual states. The importance of religious freedom gains greater significance given the social, security, and economic benefits it brings. Such religious freedom is truly possible only in a climate of common understanding fostered by specific educational policies. America with its legal framework allows for such a policy of comparative religious education integrated into the Common Core and supported with government funding. Such a policy has already been implemented with great results in Modesto, California with no negative legal or secular repercussions. I anticipate that similar success would be had with a nationwide initiative in America that can then be adapted internationally.

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81 Emile Lester & Patrick S. Roberts, *How Teaching World Religions Brought a Truce to the Culture Wars in Modesto, California*, 31 BRITISH J. RELIG. EDUC. 197 (2009).

