

SYMPOSIUM

THERE IS A PLACE FOR MUSLIMS IN AMERICA: ON DIFFERENT UNDERSTANDINGS OF NEUTRALITY

*Mark Aaron Goldfeder**

INTRODUCTION

Professor Pin's essay, which is the starting point for this Symposium's discussion,¹ makes reference to an earlier article of his—*Does Europe Need Neutrality? The Old Continent in Search of Identity*.² That article and this Essay focus on the idea of neutrality in law and religion at the national and international level, comparing the approaches and understanding of some European countries and the United States of America. France, for instance, bans public religious symbols under the banner of neutrality;³ Switzerland bans minarets;⁴ and Italy was forced to adopt certain ideas of ceremonial deism to keep the crucifix in the classroom without violating neutrality.⁵ Professor Pin adopts a minimalist understanding of neutrality in the context of explaining why these states have made these somewhat limiting decisions, explaining that neutrality is based on “a state's attitude that in order to

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* Dr. Mark Goldfeder, Esq. is Senior Lecturer at Emory University School of Law, Spruill Family Senior Fellow at the Center for the Study of Law and Religion, and Director of the Restoring Religious Freedom Project. Special thanks to Amin Sadri, J.D., LL.M. and Anton Sorkin, J.D., LL.M. for their research assistance.

1 See Andrea Pin, *Is There a Place for Islam in the West? Adjudicating the Muslim Headscarf in Europe and the United States*, 93 NOTRE DAME L. REV. ONLINE 35 (2017).

2 Andrea Pin, *Does Europe Need Neutrality? The Old Continent in Search of Identity*, 2014 BYU L. REV. 605; see also Pin, *supra* note 1, at 40 n.43.

3 See JUSTIN VAISSE, BROOKINGS INST., VEILED MEANING: THE FRENCH LAW BANNING RELIGIOUS SYMBOLS IN PUBLIC SCHOOLS 1 (Mar. 2004), <https://www.brookings.edu/articles/veiled-meaning-the-french-law-banning-religious-symbols-in-public-schools/>.

4 See Nick Cumming-Bruce & Steven Erlanger, *Swiss Ban Building of Minarets on Mosques*, N.Y. TIMES (Nov. 29, 2009), <http://www.nytimes.com/2009/11/30/world/europe/30swiss.html?mcubz=1>.

5 See Pin, *supra* note 2, at 606; see also *Lautsi v. Italy*, App. No. 30814/06 (Eur. Ct. H.R. 2011).

protect the religious freedom of believers and nonbelievers, the state must not take a position in favor of or against any religious view.⁶ In theory this sounds fine, and even somewhat similar to the American Establishment Clause line of jurisprudence which says that the government should not pass laws that have the primary purpose of either advancing or inhibiting religion.⁷ But in actuality, there is a significant difference between refusing to take a position in favor of religion and making the assumption that protecting the religious freedom of nonbelievers means excluding religious symbols from public display. That second approach, the European approach, assumes that there remains something inherently dangerous or off-putting about religion or its symbols. For example, in the *Achbita* case that Professor Pin discusses,⁸ the Court of Justice of the European Union upheld a ban on visible religious signs in the workplace because the business wanted to maintain its appearance of “neutrality,”⁹ an argument which assumes that “neutral” people must be non-religious, or non-visibly religious, or that religion itself is somehow not compatible with neutrality.

While it is certainly true that there are multiple versions and interpretations of neutrality even within the European system, it is this problematic understanding of neutrality that leads people to question if there is a place for Muslims in the West. As a distinct religious minority, with particular religious symbols, a culture that sees those symbols as non-neutral will almost certainly exclude at least some Muslims (and perhaps particularly women)¹⁰ from full societal acceptance. Thankfully, the American legal system’s understanding of neutrality is fundamentally different, and in fact guarantees that religious minorities, including Muslims, will always have a place in the United States where they can live and thrive. As Andrew Koppelman has noted, “neutrality is available in many forms. The First Amendment stands for one such specification. That specification has done its work well.”¹¹

American neutrality is not about the government making sure religion is not visible or even treated benevolently. The American concept of neutrality just means that the government should not treat religion as special, for better or for worse, simply because it is religion. For example, the Supreme Court has repeatedly held that laws touching religion must have a valid secular purpose, and not serve

6 Pin, *supra* note 2, at 608–09 (citing B. MASSIGNON & V. RIVA, *L’EUROPE, AVEC OU SANS DIEU? HÉRITAGES ET NOUVEAUX DÉFIS* 269 (L’Atelier-Fidélité ed., 2010); L. ZUCCA, *A SECULAR EUROPE* xxi (Oxford University Press, 2012)).

7 See, e.g., *Walz v. Tax Comm’n*, 397 U.S. 664, 669 (1970); *Epperson v. Arkansas*, 393 U.S. 97, 103–04 (1968); *Abington Sch. Dist. v. Schempp*, 374 U.S. 203, 299 (1963) (Brennan, J., concurring); *Everson v. Bd. of Educ.*, 330 U.S. 1, 18 (1947).

8 Case C-157/15, *Achbita v. G4S Secure Sols. NV*, 2017 EUR-Lex CELEX LEXIS 0157 (Mar. 14, 2017).

9 *Id.* ¶ 40.

10 Ndella Paye, a Muslim feminist and anti-racist, described Muslim women in France as “ostracized,” noting how “[t]hey can’t go to schools, they can’t go to work, they can’t go to the beach or the swimming pool.” Anne-Sylvaine Chassany, *France: Islam and the Secular State*, *FIN. TIMES* (Sept. 15, 2016), <https://www.ft.com/content/05c420b8-75a5-11e6-b60a-de4532d5ea35?mhq5j=e5>.

11 ANDREW KOPPELMAN, *DEFENDING AMERICAN RELIGIOUS NEUTRALITY* 5 (2013).

primarily to advance or inhibit religion.¹² But that does not mean that religion should not be respected. The key to the American conception of religious neutrality lies in the understanding that religion is valuable—despite what strict secularists may say—and yet its “value is best honored by prohibiting the state from trying to answer religious questions”¹³—despite what traditionalists believe.¹⁴ So long as that balance is respected, so long as religion is valuable for other reasons than the fact that it may contain an ultimate truth, religion can be treated just as well as any other beneficial aspect of society. When that balance is respected without the State trying to answer religious questions or opine on religious truths, when all religions are under one umbrella, then minority religions have nothing to fear.¹⁵ And when the State treats religion *writ broad* as a certain type of societal good, with the understanding that all “religions” (including, for example, nontraditional but legally recognized religions like secular humanism) are equal before the eyes of the law, the expression of religion through the display of a religious symbol becomes a much more neutral statement.

The difference in approach from the European model might stem from the American legal system asking a slightly, but fundamentally, different question than European legal systems. To be clear, at the core of American law and religion is the understanding that religion *is* special—that is why it is our first freedom, separated from other forms of speech, press, and association.¹⁶ But instead of asking *why* religion is special, which is the kind of question that can raise the temperature quickly in any debate about deeply-held beliefs and push people to ban religious symbols so as to avoid the topic and the setting of truth-values altogether, we ask *how* religion is special, in the hope that quantifiable data can explain what theological proofs regarding the infinite unknown by definition cannot.

Once we have refocused the question, the answer to why religious minorities, including Muslims, and their religious symbols will always have a place in the United States becomes clear. As Professor John Witte, Jr., has repeatedly noted, religion is not a problem to be solved but a promise to be harvested for the public good.¹⁷ Religion, regardless of what kind, is *demonstrably* beneficial for society. For example, amongst all organizations, religious organizations receive the largest

12 See, e.g., *Wallace v. Jaffree*, 472 U.S. 38, 55 (1985) (quoting *Lemon v. Kurtzman*, 403 U.S. 602, 612 (1971)).

13 KOPPELMAN, *supra* note 11, at 2.

14 See Mark Goldfeder, Book Review, 30 J.L. & RELIGION 541 (2015) (reviewing KOPPELMAN, *supra* note 11); see also John Witte, Jr. & Joel A. Nichols, “Come Now Let Us Reason Together”: Restoring Religious Freedom in America and Abroad, 92 NOTRE DAME L. REV. 427, 450 (2016) (“Religion is too vital a root and resource for democratic order and rule of law to be passed over or pushed out.”).

15 As Professor John Witte writes, the vision for America would not be one where “one form of Christianity . . . be established[,]” but where “[a]ll forms of Christianity [would be made] to stand on their own feet and on an equal footing with all other religions.” JOHN WITTE, JR. & JOEL A. NICHOLS, RELIGION AND THE AMERICAN CONSTITUTIONAL EXPERIMENT 1 (4th ed. 2016).

16 See *id.* at 287.

17 See *id.*; Witte & Nichols, *supra* note 14, at 450.

share of volunteer work and charitable contributions.¹⁸ As former Chief Rabbi Lord Jonathan Sacks of the United Kingdom has noted,

[Religion is] a sustained education in a life lived beyond the self. . . .

Long before these functions were taken over by the state, religious groups here and elsewhere were building schools and hospitals and networks of support. . . . I do not say that to be good you need to be religious, but religiosity as measured by attendance at a house of worship turns out to be a better predictor of altruism and empathy than education, age, income, gender, or race.

. . . Just as religions were building a welfare state before there was a welfare state, so now and in the future they may help sustain a welfare society in areas where the need for help is greater than the ability of governments to provide it. They act as a counter-voice to the siren song of a culture that sometimes seems to value self over others, rights over responsibilities, getting more than giving,¹⁹ consumption more than contribution, and success more than service to others.

Because religions, including Islam, are beneficial to society, treating them benevolently is not about declaring one or another to be correct, or ultimately truthful, in a way can that can be construed as threatening or that ultimately infringes on anyone else's beliefs. It is nothing more than a neutral acknowledgment and appreciation for a particular medium that provides a host of secular goods.

The rest of this Essay will focus on demonstrating *how* religion is demonstrably neutrally good, and therefore *why* religion can sometimes be granted special treatment without violating the American norm of neutrality.

I. RELIGION AS A SECULAR GOOD

Government support for and accommodation of the expression of religions through personal nonharmful religious symbols, regardless of the particular faith, is a permissible and practical way of supporting activities that lead to great secular benefit.²⁰

From the time of our first president, leaders of this country have recognized that religion plays a critical role in the *secular* life of a democracy. George Washington emphasized the importance of religion in his famous Farewell Address:

Of all the dispositions and habits which lead to political prosperity, religion and morality are indispensable supports. In vain would that man claim the tribute of patriotism who should labor to subvert these great pillars of human happiness—these firmest props of the duties of men and citizens. The mere politician, equally with the pious man, ought to respect and to cherish them. A volume could not trace all their connections with private and public felicity. Let it simply be asked, Where is the security for property, for reputation, for life, if the sense of religious

18 CHRISTOPHER M. TOPPE ET AL., INDEP. SECTOR, GIVING & VOLUNTEERING IN THE UNITED STATES: FINDINGS FROM A NATIONAL SURVEY 19 (2001).

19 Chief Rabbi Lord Sacks, Role of Religion in Society in the United Kingdom (Nov. 22, 2012), <http://rabbisacks.org/house-of-lords-role-of-religion-in-society-in-the-united-kingdom/>.

20 See generally *Amicus Curiae* Brief of American Center for Law and Justice in Support of Petitioners, *Zubik v. Burwell*, 136 S. Ct. 1557 (2016) (No. 14–1418).

obligation *desert* the oaths which are the instruments of investigation in courts of justice?²¹

Though often chastised by some for the opposite, President Obama, who had worked at the grassroots level before his career in politics, also recognized the important role religious nonprofits play in serving local communities:

Now, as we move to implement this rule, however, we've been mindful that there's another principle at stake here—and that's the principle of religious liberty, an inalienable right that is enshrined in our Constitution. . . .

In fact, my first job in Chicago was working with Catholic parishes in poor neighborhoods, and my salary was funded by a grant from an arm of the Catholic Church. And I saw that local churches often did more good for a community than a government program ever could, so I know how important the work that faith-based organizations do and how much impact they can have in their communities.²²

President Obama was correct that religious liberty is an inalienable right and that religious groups do good work. Where people err is in thinking that it is only a right, not a good, and that the great work they do is only religious, and not secular in nature. In fact, studies have shown time and again that involvement in religious organizations and religious networks is one of the strongest predictors of philanthropic generosity and civic involvement that are available.²³ Research shows that religious Americans are generally more altruistic neighbors and tend to be more conscientious citizens than their secular counterparts.²⁴ Holding constant for all other demographic predictors of volunteering (including gender, education, income, race, region, homeownership, length of residence, marital and parental status, ideology, and age) the research findings are simply remarkable.²⁵

Over one third of all volunteering in America is done for religious organizations.²⁶ Significantly, of all people who volunteered for a religious group, over ninety percent also volunteered for at least one *secular* group—making them two to three times more likely to volunteer for secular groups than people who do not volunteer for religious groups.²⁷ In the Giving and Volunteering surveys from

21 President George Washington, Farewell Address (Sept. 17, 1796), in 1 A COMPILATION OF THE MESSAGES AND PAPERS OF THE PRESIDENTS 220 (James D. Richardson ed., 1896).

22 President Barack Obama, Remarks by the President on Preventive Care (Feb. 10, 2012), <https://obamawhitehouse.archives.gov/the-press-office/2012/02/10/remarks-president-preventive-care>.

23 See ROBERT D. PUTNAM & DAVID E. CAMPBELL, AMERICAN GRACE: HOW RELIGION DIVIDES AND UNITES US 444–58 (2010); *Amicus Curiae* Brief of American Center for Law and Justice in Support of Petitioners, *Zubik v. Burwell*, 136 S. Ct. 1557 (2016) (No. 14–1418); see, e.g., TOPPE ET AL., *supra* note 18, at 19. See generally GIFTS OF TIME AND MONEY: THE ROLE OF CHARITY IN AMERICA'S COMMUNITIES (Arthur C. Brooks ed., 2005).

24 See PUTNAM & CAMPBELL, *supra* note 23, at 444–58.

25 *Id.* at 445–46.

26 *Id.* at 444. Other research, including the 2006 Faith Matters survey, suggests that the number is even higher. See INTERNATIONAL COMMUNICATIONS RESEARCH, FAITH MATTERS SURVEY (Robert D. Putnam & David E. Campbell eds., 2006), <http://www.icpsr.umich.edu/icpsrweb/RCMD/studies/36315> [hereinafter INTERNATIONAL COMMUNICATIONS RESEARCH].

27 PUTNAM & CAMPBELL, *supra* note 23, at 445.

1988–2001, forty-five percent of weekly churchgoers reported nonreligious volunteering in addition to their religious volunteering, while only twenty-six percent of non-churchgoers volunteer for anything at all.²⁸ Compared to someone who goes once a year, the weekly churchgoer volunteers an extra 10.5 hours a month for religious causes and 6.4 hours more for secular causes.²⁹ This difference is especially marked for service to poor, elderly, and young people.³⁰

In terms of charitable giving, the findings are even clearer: giving to religious charities, no matter what religion, is strongly and positively correlated to giving to secular charities and organizations.³¹ “Measuring charitable giving as a fraction of annual income, the average person in the most religious fifth of [the population] is more than four times as generous as his or her counterpart in the least religious fifth.”³² “70 percent of above-average givers to religious causes are also above-average givers to secular causes, while 67 percent of below-average givers to religious causes are below-average givers to secular causes.”³³ And these statistics hold true even though regular churchgoers tend to be slightly disproportionately poorer.³⁴ While “virtually every part of the American philanthropic spectrum benefits disproportionately from giving by religiously observant men and women, . . . this is especially true for organizations serving the needy” and the vulnerable.³⁵

The nonprofit sector, including public charities and religious organizations, contributes nearly \$887.3 billion to the United States economy.³⁶ The religious organizations in particular have a long history of using public money for the benefit of at-risk and needy populations.³⁷ This long history of service places religious charities in a unique position to “play a critical role to fill in the gaps that are increasingly beginning to show in the social welfare net.”³⁸ The impact of these religious nonprofits is not limited to their work in their local communities. Religious nonprofits play a vital role in fulfilling the United States’ mission of charity around the globe. Together with secular organizations, religious nonprofits deliver “more

28 *Id.* at 445–46.

29 *Id.* at 446.

30 *Id.*

31 *Id.* at 447–50.

32 *Id.* at 448.

33 *Id.* For both of these comparisons, the results from the Giving and Volunteering Survey archives and the Faith Matters survey are almost identical. *See id.* at 448 n.11; TOPPE ET AL., *supra* note 18 (detailing the findings of the *Giving and Volunteering in the United States* 2001 survey); INTERNATIONAL COMMUNICATIONS RESEARCH, *supra* note 26.

34 PUTNAM & CAMPBELL, *supra* note 23, at 448.

35 *Id.* at 450.

36 BRICE S. MCKEEVER & SARAH L. PETTIJOHN, URBAN INST., THE NONPROFIT SECTOR IN BRIEF 2014: PUBLIC CHARITIES, GIVING, AND VOLUNTEERING 1 (Oct. 2014), <https://www.urban.org/sites/default/files/publication/33711/413277-The-Nonprofit-Sector-in-Brief---.PDF>.

37 *See* Charles J. Chaput, *A Charitable Endeavor*, FIRST THINGS (Nov. 2009), <http://www.firstthings.com/article/2009/11/a-charitable-endeavor>.

38 John Witte, Jr., *Religious Views Should Be Welcomed in Our Public Life*, FAITH & LEADERSHIP (Oct. 8, 2012), <https://www.faithandleadership.com/qa/john-witte-jr-religious-views-should-be-welcomed-our-public-life>.

aid than the whole United Nations system,”³⁹ and have a long history of international community service.⁴⁰

Studies have shown that religiosity predicts many sorts of informal altruism,⁴¹ civic involvement,⁴² and community leadership.⁴³ The evidence is also clear that religion has not only a good impact, but even a great effect upon the success of a child’s education.⁴⁴ Religious networks are about people working together for a common cause, and “have a powerful effect in encouraging neighborliness and civic engagement.”⁴⁵ They lead people to focus outward and not inward, and they do this “[b]y creating a web of interlocking personal relationships among people of many different faiths,”⁴⁶ and people of no faith at all. The effect may also be causal. Surveys found that people who became more closely involved with religious networks over time became better citizens and more generous neighbors, while those whose involvement dropped became less so.⁴⁷

In an age of intense partisanship and distrust, religion also helps bring diverse groups together. A byproduct of religious liberty has been the growth of an active and pluralistic nonprofit sector. The continued engagement of individuals in this thriving sector promotes diversity and social cohesion, and gives Americans an opportunity to engage in a religious network, with all of the associated benefits to

39 Elizabeth Ferris, *Faith-Based and Secular Humanitarian Organizations*, 87 INT’L REV. RED CROSS 311, 312 (June 2005), https://www.icrc.org/eng/assets/files/other/irrc_858_ferris.pdf (quoting *The Non-Governmental Order*, ECONOMIST (Dec. 9, 1999), <http://www.economist.com/node/266250>).

40 *See id.* at 313–16.

41 *See* PUTNAM & CAMPBELL, *supra* note 23, at 444–58. They were also more likely to give money to a charity, do volunteer work for a charity, give money to a homeless person, donate blood, help someone outside their own household with housework, spend time with someone who is down, and help someone find a job. *Id.* at 451. The Portraits of American Life Study did not find a single type of good deed that is more common among secular Americans than religious Americans. *See Portraits of American Life Study: Results & Summaries*, ARDA (2006), http://www.thearda.com/pals/Codebook/result_1.aspx (note that this survey was originally called the 2006 Panel Study of American Religion and Ethnicity, but has since been renamed the Portraits of American Life Survey).

42 PUTNAM & CAMPBELL, *supra* note 23, at 454–58.

43 *Id.* at 454–56.

44 *See* ROBERT D. PUTNAM, OUR KIDS: THE AMERICAN DREAM IN CRISIS 224 (2015) (“Compared to their unchurched peers, youth who are involved in a religious organization take tougher courses, get higher grades and test scores, and are less likely to drop out of high school. Controlling for many other characteristics of the child, her family, and her schooling, a child whose parents attend church regularly is 40 to 50 percent more likely to go on to college than a matched child of nonattenders.”); *see also* John Horvat II, *The Impact That Religion Has on Education That Teachers Are Ignoring*, THE BLAZE (Apr. 17, 2015), <http://www.theblaze.com/contributions/educators-ignore-the-part-religion-can-play-in-education/> (citing Putnam’s findings and emphasizing the “clearly . . . positive impact” religion has on “the educational development of children”). John Horvat II is a scholar, researcher, educator, international speaker, and author of the book RETURN TO ORDER: FROM A FRENZIED ECONOMY TO AN ORGANIC CHRISTIAN SOCIETY—WHERE WE’VE BEEN, HOW WE GOT HERE, AND WHERE WE NEED TO GO (2013).

45 PUTNAM & CAMPBELL, *supra* note 23, at 478.

46 *Id.* at 550.

47 *Id.* at 476.

themselves and to society. A full eighty-four percent of Americans see religious diversity as good for America.⁴⁸ Religious diversity among social networks promotes and fosters religious acceptance and tolerance. When Americans associate with people of other faiths, they become more accepting of others.⁴⁹ As Putnam explains it, “[h]ow has America solved the puzzle of religious pluralism—the coexistence of religious diversity and devotion? And how has it done so in the wake of growing religious polarization? By creating a web of interlocking personal relationships among people of many different faiths. This is America’s grace.”⁵⁰

While the various studies cited do not break up religion by faith, and note that all of these factors hold true across faiths (including, for instance, the Islamic faith), at least for the call of this Symposium it is important to ask if it is demonstrably true that Islam provides or has the potential to provide these same secular goods. The answer is clearly yes. Many Muslim charitable practices have a basis in the religious traditions of Zakat and Sadaqa for Sunni Muslims and Khums for the Shia.⁵¹ In both, “wealth is seen as a ‘trust’ that one is given by God and that one must deliver to those who need it.”⁵² It was therefore not that surprising when the Institute for Social Policy and Understanding’s (ISPU) 2017 American Muslim Poll found that religiosity influences religious giving. As Youssef Chouhoud writes,

Both higher levels of religious attendance and the importance of religion in one’s life are significantly correlated with donor activity. . . . Those who never attend services are 40% less likely to donate than those who attend more than once a week, while those who feel religion is “very important” to their lives are 30% more likely to give money to religious organizations than those who say that religion is “not at all important.” Lastly, there is near absolute parity across the political ideological spectrum with virtually no difference between liberals and conservatives, all else equal.

This portrait of American Muslim philanthropy largely aligns with the workhorse model predicting charitable giving among the general public.⁵³

While the ISPU survey inquired about donations to religious causes and institutions, another study on Muslim philanthropy and community building showed that more and more Muslims are giving to secular causes, and across faith lines.⁵⁴ A major study of American Muslims conducted in 2008 by the University of

48 *Id.* at 520.

49 *Id.* at 547.

50 *Id.* at 550.

51 Sabith Khan, *Is Muslim Philanthropy in the U.S. Coming Into Its Own?*, NONPROFIT QUARTERLY (Mar. 3, 2017), <https://nonprofitquarterly.org/2017/03/03/muslim-philanthropy-u-s-coming/>.

52 *Id.*

53 Youssef Chouhoud, *American Muslim Poll 2017: Why Muslims Give*, INST. SOC. POL’Y & UNDERSTANDING (Sept. 15, 2017), <https://www.ispu.org/why-muslims-give/>; *see also* DALIA MOGAHED & YOUSSEF CHOUHOUD, INST. SOC. POL’Y & UNDERSTANDING, AMERICAN MUSLIM PHILANTHROPY: MUSLIMS AT THE CROSSROADS (2017), <https://www.ispu.org/amp2017-american-muslim-philanthropy/> (providing “a multi-dimensional portrait of the American Muslim community” based on the findings of the American Muslim Poll 2017).

54 *See* Sabith Khan, *New Styles of Community Building and Philanthropy by Arab-American Muslims*, 27 VOLUNTAS: INT’L J. VOLUNTARY & NONPROFIT ORGS. 941, 955 (2016).

Washington's Institute for the Study of Ethnicity, Race and Sexuality found that involvement with the mosque and increased religiosity also increases civic engagement and support for American democratic values.⁵⁵ According to the study,

[M]osques help Muslims integrate into [U.S.] society, and in fact have a very productive role in bridging the differences between Muslims and non-Muslims in the United States. This is a finding in social science that is consistent with decades of research on other religious groups such as Jews, Protestants and Catholics where church attendance and religiosity has been proven to result in higher civic engagement and support for core values of the American political system. Likewise, mosques are institutions that should be encouraged to function as centers of social and political integration in America.⁵⁶

Demonstrably then, religions, including Islam, provide certain quantifiable goods for society, and not because (or quantifiably because) any one religion has a monopoly on truth. If that is the case, then the non-harmful expression of religiosity should be encouraged, not necessarily for God's sake, but for the sake of these neutral, secular goods.

II. CALL TO SHIFT THE EUROPEAN QUESTION

The benefits of religion that I have discussed are not exclusively an American phenomenon. If the Europeans made the shift to asking how religion is good (which allows for many traditions, as long as they have positive impacts) instead of why religion is special (which in theory could allow for only religions deemed doctrinally correct) there might be more room for diversity and pluralism without anyone having to even consider or acknowledge the potential truth value of any or all religions. In recent studies, Gallup has found a similar connection between religion and civic engagement (including giving, volunteering, and helping strangers) around the world.⁵⁷ Using data from the 2008 European Values Study, researchers have found that religion has a significant positive effect on civil activism,⁵⁸ and a 2015 study published in the *European Journal of Political Research* found that regular religious

55 INTERFAITH ALL. & RELIGIOUS FREEDOM PROJECT OF THE FIRST AMENDMENT CTR., WHAT IS THE TRUTH ABOUT AMERICAN MUSLIMS? QUESTIONS AND ANSWERS (2013), <https://www.tolerance.org/magazine/publications/what-is-the-truth-about-american-muslims/american-muslims-in-the-united>; see also *Muslim and American Opinion Survey*, SOC. SCI. RESEARCH COUNCIL, <http://muslimamericansurvey.org> (last visited Oct. 24, 2017).

56 Press Release, National Survey of American Muslims Finds Mosques Help Muslims Integrate into American Political Life, SOC. SCI. RESEARCH COUNCIL, (Mar. 8, 2011), <http://www.muslimamericansurvey.org/pdf/march82011.pdf>.

57 Brett Pelham & Steve Crabtree, *Worldwide, Highly Religious More Likely to Help Others*, GALLUP (Oct. 8, 2008), <http://www.gallup.com/poll/111013/worldwide-highly-religious-more-likely-help-others.aspx>.

58 See Mălina Voicu & Claudiu Tufiş, *Religion and Social Participation in Postcommunist Europe*, in RELIGION AND CIVIL SOCIETY IN EUROPE 204 (Joep de Hart, Paul Dekker & Loek Halman eds., 2013).

attendance increases political participation rates among ethnic minorities of different religions.⁵⁹

When it comes to specifics, the country with the most readily accessible data is Great Britain. A study of the 2010 British Parliamentary Elections showed that there is a positive correlation between regular religious attendance and political participation among racial and ethnic minorities.⁶⁰ A 2014 study in the United Kingdom found “that 1.1–1.4 million volunteers participated in church-based social action in the [United Kingdom] in 2014, touching millions of people through various initiatives: community building (e.g. parents and toddlers); compassion ministries (e.g. caring for the elderly); crisis intervention (e.g. debt advice); and education (e.g. school assemblies).”⁶¹ United Kingdom “churches increase[ed] their spending on social action to approximately £393m in 2014” and, “[u]nsurprisingly, the larger the church, the more hours and money [were] spent on social action initiatives.”⁶² But perhaps most interesting, a 2013 study found that Muslims are the most charitable religious group in the United Kingdom.⁶³ Again, while the statistics on secular giving are not as readily available throughout the European continent, it is reasonable to assume that there are similar patterns. A Pew study of Muslims around the world found that in most of the countries surveyed in the region, two-thirds or more of Muslims say they annually donate a percentage of their wealth to charity or the mosque.⁶⁴

CONCLUSION

Returning to the question that Professor Pin has raised (“Is there a place for Muslims in the West?”), I think that the answer is there should be, and in some places, like the United States, there already is. But the reason is not because America believes that Islam represents a particular sectarian religious truth; it is because Islam, like all of the other religions that America respects without passing judgment on, has the potential to bring tremendous secular neutral good. Perhaps if Europe were to focus more on the how and less on the why, the shift in question could lead to a shift in focus, one in which expressions of religion were seen as an encouragement of neutral goods including tolerance, engagement, and inclusion, as opposed to divisive signs of separation and seclusion.

59 Maria Sobolewska, Stephen D. Fisher, Anthony F. Heath & David Sanders, *Understanding the Effects of Religious Attendance on Political Participation Among Ethnic Minorities of Different Religions*, 54 EUR. J. POL. RES. 271, 281 (2015).

60 *Id.* at 284.

61 GEOFF KNOTT, JUBILEE+, INVESTING MORE FOR THE COMMON GOOD: NATIONAL CHURCH SOCIAL ACTION SURVEY RESULTS 2014 1 (Dec. 2014), <https://jubilee-plus.org/docs/Report-National-Church-Social-Action-Survey-2014-Executive-Summary.pdf>.

62 *Id.*

63 Ruth Gledhill, *Muslims 'Are Britain's Top Charity Givers'*, TIMES (London) (Jul. 20, 2013), <https://www.thetimes.co.uk/article/muslims-are-britains-top-charity-givers-c7w0mrzzknf>.

64 THE PEW FORUM ON RELIGION & PUB. LIFE, PEW RESEARCH CTR., THE WORLD'S MUSLIMS: UNITY & DIVERSITY 53 (Aug. 9, 2012), <http://www.pewforum.org/2012/08/09/the-worlds-muslims-unity-and-diversity-2-religious-commitment/>.