

PROTECTING THE PRESENCE OF RELIGIOUS STUDENT ORGANIZATIONS

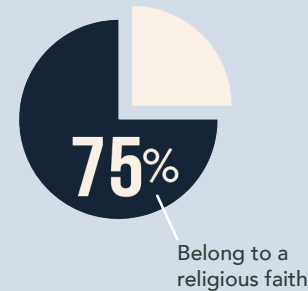




RELIGIOUS DIVERSITY

Universities are some of the most religiously diverse places in the country, and religion plays a significant role in the lives of many students. Authentic religious communities offer holistic care for students, alleviating the high pressure environment of the academy, and supporting their emotional health — a pressing need for many college students. The presence of a vibrant and diverse religious community, through thriving religious student organizations, also promotes respect for different viewpoints and enhances diversity.

Religion is a topic that modern students care about. Often, the climate on campus makes it hard for students to freely engage in religious topics, as individuals and as student associations.



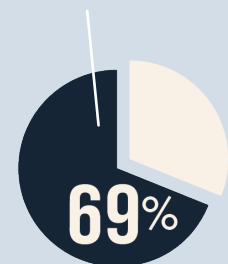
In a survey of more than 35,000

- college graduates in 2014, by Pew Research Center, about 75 percent identified as belonging to a religious faith, and 47 percent said religion was "very important" in their lives.¹

In a 2016 survey of incoming

- freshmen students, 69 percent indicated their "current religious preference" as identifying with a specific religion.²

Identify with a specific religion



"While higher education has

- stepped forward to do the hard — even heroic — work of engaging diversity issues related to race, gender, ethnicity, and sexuality, religious identity has too frequently been dismissed or treated with derision."
– Eboo Patel , Interfaith Youth Core Founder and President ³

THE UNIVERSITY ENVIRONMENT

The university environment is a unique place. Many students are living outside their home environment for the first time and are shaping and solidifying their identities and viewpoints away from their families' influence. Universities should be developing respectful citizens who can compassionately engage with and collaboratively address complex social problems. Students must be comfortable with difference.

To promote the type of respect and engagement that allows for social and emotional maturity, students should have both safe places where they can belong and associate with those holding similar beliefs, as well as spaces where they can dialogue across difference. Most universities value the presence of student organizations for this very reason, and consider them a central part of student life on campus.

**IS FAITH
IN GOD
REASONABLE?**

THE VERITAS FORUM

OCT. 28 | IU AUDITORIUM | 8:00 PM

Religious student groups on campus help meet these goals for student development and guide students toward compassionate engagement. Religious groups regularly participate in service projects and other activities, promoting wellbeing in their communities and around the world.

Mini Stories

At Indiana University, Cru and the Secular Alliance co-sponsor an annual event called the Veritas Forum to promote respectful dialogue about important questions of life.

Students from Cru at California State University, Chico, led several student orgs to sponsor a 5K run, raising money to stop sex trafficking.



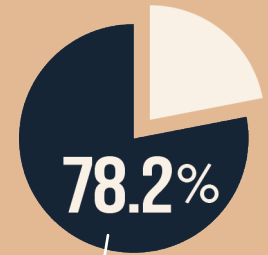
RELIGIOUS GROUPS MAKE A DIFFERENCE

Student organizations provide safe spaces for students to find support and to flourish as they enter adulthood, explore their identity, and formulate their values. Students need community to develop into healthy, responsible citizens. Religious community in particular, by caring for the emotional and spiritual aspects of life, provides that support as students deal with the stresses of college, such as pressure to succeed or relational stress, which can lead to isolation and despair. The spiritual side of life is especially important for many — they either desire to explore new faith perspectives or want to find a faith community similar to the one they were raised in. They should have the opportunity to do so, right on campus.

Cru students at University of Maryland raised more than \$3,700 for clean water access in Rwanda.



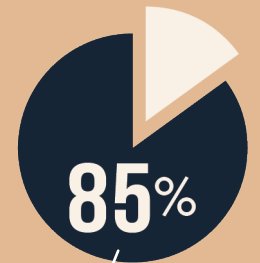
- Students frequently engage on the topic of religion. In a 2016 survey of college freshmen by UCLA's Higher Education Research Institute, 78.2 percent of students surveyed said they have "frequently" or "occasionally" "discussed religion."⁴



"Frequently" or
"occasionally"
"discussed religion"

“Overall, religious commitment and participation contribute to general feelings of satisfaction, enhanced quality of life, happiness, and the perception that life is meaningful.”⁵
- Professor Alyssa N. Bryant, North Carolina State University

- 85 percent of students prioritize welcoming people of diverse religious and nonreligious perspectives.⁶
- When asked to describe the religious and spiritual climate of their campus or examples of their engagement with these dimensions, many students identified student religious organizations as a prime mechanism for religious and spiritual involvement. Students described these organizations as generally welcoming and as evidence of a campus that was spiritually 'open.'⁷



Prioritize welcoming
people of diverse
religious & nonreligious
perspectives

In addition to making a difference in individual students' lives, religious student organizations also contribute to their campus community, and serve local and global communities.

Love people. Change the world. Together.

During “Love Week” at George Mason University in Northern Virginia, organized by Cru, students and staff from every background and religion join together to serve the most marginalized and needy in the world. The goal is simple: “Love people, change the world.” The students who make up Mason Cru believe that by loving and serving those often overlooked by mainstream society, real world change can — and will — happen.



In 2017, they partnered with Global Aid Network (GAIN), the humanitarian partner of Cru, to meet tangible needs for one of the most at-risk people groups in the world: refugees.

The week kicked off with a percentage night at a local restaurant, a talent show and raffle, and a t-shirt sale. The week culminated with a day-long food packing event where hundreds of students and faculty packed 40,000 rice and beans meals that GAIN will distribute to those in the Middle East who have been displaced by conflict.

GAIN's mission is to relieve suffering, restore dignity, and reveal hope. Through Mason Cru's partnership with GAIN, GMU students were able to participate in bringing life and relief to refugees. The week finished with students listening to Jenny Yang, vice president of World Relief, who spoke about the current refugee crisis and how students could continue to love and serve refugees beyond Love Week.

While the goal of Love Week is to meet practical needs in the global community, Mason Cru also intends the week to be a time of learning for the students who participate — challenging them to think about current issues in the world and ways they can be a part of the solution; encouraging them to value loving others around the world and on campus.

During the week, Mason Cru, the Muslim Student Association, the Jewish Student Association, and the campus at large throw their differences aside, join in service together, and love each other to better love the world.

For more stories of the good these student groups are doing, including hurricane relief work, serving at-risk youth, and providing medical services in international mission hospitals, see Appendix 1 on p. __



BUT THERE IS A PERVASIVE PROBLEM:

Universities are squeezing out the ability of religious student groups to function and flourish on campuses. Because of hindrances on university campuses, these students are not able to create authentic faith communities. These issues affect many religious groups, thereby impacting a broad segment of the student population who look to these communities for support.

Every student group will, logically, want student leaders who believe in their purpose and the faith the group represents to their fellow students. Student leaders maintain the identity of the group and determine its direction. If the leaders do not agree with and know how to live out the theological teachings of a group of any particular religious tradition, that group will, over time, cease to represent that religious identity. Students are free to disagree and to stop attending groups, move to other groups, or start their own. The diversity of the campus is best served when religious groups are able to retain their unique religious identities.

Religious groups of all types agree on the importance of being able to select their leaders according to their religious beliefs. Recently, students from many faiths on various campuses, such as Indiana University and New York University, have united to defend their right to choose leaders based on their unique faith traditions. These coalitions have included students from Jewish, Catholic, Protestant, Muslim, non-denominational Christian traditions, and more.

The Supreme Court has articulated clear principles that should protect religious groups, yet the threat remains.

“In the realm of private speech or expression, government regulation may not favor one speaker over another.”⁸

“[I]deologically driven attempts to suppress a particular point of view are presumptively unconstitutional” in the context of a limited open forum.⁹

To examine and seek to censor the beliefs or expression of religious groups “would risk fostering a pervasive bias or hostility to religion, which could undermine the very neutrality the Establishment Clause requires.”¹⁰

“[A]n open forum in a public university does not confer any imprimatur of state approval on religious sects or practices.”¹¹

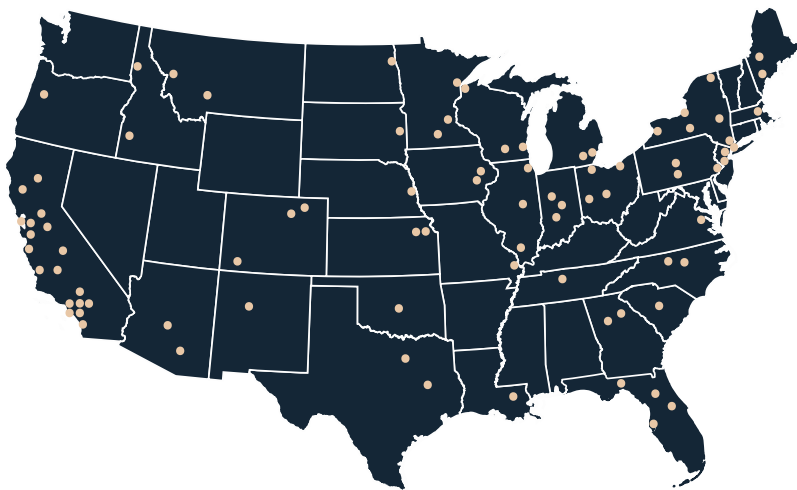
The state infringes the Free Exercise Clause and violates the Establishment Clause when it requires a religious organization to accept a particular leader because “[s]uch action interferes with the internal governance of the church, depriving the church of control over the selection of those who will personify its beliefs.”¹²



STIFLING RELIGIOUS VOICES

Despite a clear mandate to allow diverse viewpoints (including religious ones) in the campus setting, universities still frequently seek to stifle religious perspectives because they don't conform to the dominant campus culture.

The following map shows that the problem is pervasive. The dots represent known campus access challenges in recent years. While many of these issues are resolved on a one-by-one basis, the fact that they arise throughout the country and even reoc-



cur on some campuses, indicates that it is a national concern that needs to be addressed at the national level. Marginalizing religious groups causes long-term harm because it chips away at authentic religious diversity and undermines the historic role of universities as places to teach our future leaders the value of respectful civil discourse. The following pages include examples of the challenges religious groups face.

Religious groups should be allowed to be uniquely religious. In a 2014 nationwide survey, 91 percent of Americans agreed (either "strongly" or "somewhat") that "college students should be allowed to follow their faith and choose leaders of their campus religious groups who share their beliefs."
—Heart+Mind Strategies¹³

INDIANA UNIVERSITY THREATENS TO EXCLUDE STUDENT ORGANIZATIONS

In August 2015, Indiana University announced a change of university policy for student organizations. All student organizations had to affirm that they would allow any student “to participate in, become a member of, and seek leadership positions” without considering “religion” or other listed categories. This prohibition of considering one’s “religion” for leadership would have meant that a Catholic student group could not require its leaders to believe in Catholic doctrine, a Muslim student group could not require its leaders to be followers of Islam, and a Jewish student group could not require its leaders to be Jewish.

In an FAQ document about the new policy, the university specifically stated that a religious student group could not refuse to allow a student of a different religion, or of no religion, to seek a leadership position. Yet the policy allowed most other student organizations to require agreement with their core purposes. In addition, fraternities and sororities

could continue to discriminate on the basis of sex in their selection of members and leaders.

This meant that religious groups would be singled out for different treatment than other groups because of their religious status. Religious messages were being treated differently than other groups’ messages due to their religious nature. In response to this unfair treatment, 20 religious student groups — including Jewish, Roman Catholic, Protestant, Muslim, and Evangelical Christian — sent a letter to the administration expressing their concerns about the new policy. The letter stated that the signatories “agree on affirming the freedom of all students to organize based upon their shared religious beliefs and accompanying actions. This includes the right to choose their leaders as their unique faith tradition guides them.”

After seven months of communication from students, parents, alumni, donors, and state political leaders, the university announced that it would return to its original policy and allow religious student groups to have religious leadership requirements.

Religious groups were thankful to serve their campus again without fear of losing either their registered status or their authentic religious identity. It was unfortunate, however, that it took so much effort to achieve fair treatment. This battle is not unique. Similar challenges continue to emerge on campuses across the nation.

A NEEDED SPIRITUAL HOME

In a June 2015 letter to the Chair of the House Judiciary Committee's Subcommittee on the Constitution and Civil Justice, the student president of ReJOYce in Jesus Campus Fellowship (RJCF) at California State University, Northridge, wrote:

"As a group whose membership draws many students from the African American community, RJCF understands the critical importance of nondiscrimination policies, and discrimination is not something we take lightly. We have painfully come to learn that nondiscrimination policies can be misused, as CSU is doing by recently reinterpreting and misinterpreting its nondiscrimination policy to exclude religious student organizations from campus for being religious.

"RJCF meets weekly for Bible Study, prayer, and mutual encouragement. We help one another, pray for one another, and encourage one another. Many RJCF members are away from home for the first time. RJCF's meetings provide a spiritual home during the challenging adjustment to college life."

Eventually, the university retreated from its position by providing a letter stating that, under certain circumstances, religious groups' leadership selection processes could include questions about a candidate's religious beliefs. But the policy prohibiting religious leadership requirements continues to be the official policy of the California State University system, and the religious groups remain on campus solely at the discretion of university administrators.

RECURRING CHALLENGES

Some campuses repeatedly establish or implement policies that unfairly disadvantage religious groups. The University of Northern Colorado (UNC) implemented policies in both 2011 and 2018 that single out religious groups for different treatment. In 2011, its funding policy for student organizations categorically denied funding for "ideological, political, or religious activities." The UNC Board of Trustees changed the policy after a religious student group that had been denied funding wrote a letter pointing out that the policy violated Supreme Court precedent. In 2018, UNC again singled out religious groups by applying a different student organization policy to deny registered status to religious groups that require their student leaders to affirm the group's religious beliefs. UNC told several groups that they had violated the school's policy by having religious qualifications for leaders.

This is a recurring problem, as campuses across the nation apply their policies to prevent religious groups from requiring their leaders to agree with their religious beliefs. For some campuses, the decision is based on a misunderstanding of the law; they think they are guarding the separation between the government and religion. Instead, they violate the separation of government and religion by interfering with a religious group's leadership decisions. They also discriminate against religious students by excluding their voices from the public spaces that the colleges have opened for free speech. Religious groups should not be treated differently than other groups merely because they are religious, but should receive the same access given to other student groups. The Supreme Court has established that the First Amendment applies on a public university campus, and students have the right "to

associate to further their personal beliefs.” Religious worship and discussion “are forms of speech and association protected by the First Amendment.” Student organizations exist to allow for a wide range of expression and association by the members of the student body.

A university does not violate the Establishment Clause when it allows religious student groups to meet on campus, because the speech belongs to the students, not the university. Instead, it violates Establishment Clause principles when government officials, including college administrators, dictate how religious groups may select leaders. It is common sense for religious groups to select leaders who will preserve and express the religious beliefs and practices of the organization. Religious groups can only freely express and live out their authentic religious beliefs when they are free from governmental interference in their internal leadership selection processes.

Law Students from two student groups—Christian Legal Society and Delta Theta Phi—at the Northern Illinois University College of Law co-sponsored a fundraising event for the nonprofit Alex’s Lemonade Stand, to raise money for childhood cancer research.

More Examples

- In 2015, a student at Minnesota State University, Mankato, invited some of her dormitory neighbors to discuss religious ideas. A residential adviser told the student that she was violating a university policy that allowed students to prohibit “religious solicitation” on a dormitory floor by majority vote. Eventually the university repealed its policy.
- In 2015-2016, Southeast Missouri State University denied a religious student group recognition because it required its leaders to agree with its religious beliefs. The group worked with the administration and the student government to secure a policy that would protect religious groups. In April 2016, the student government voted to deny such protection. After the student government vote, five additional religious groups indicated that they also would not be able to remain on campus if they could not require their leaders to agree with their religious beliefs. In October 2016, the university finally chose to override the student government and agreed that religious student groups could have religious requirements for their leaders.

CONTINUING TO PROTECT RELIGIOUS SPEECH

The issue of protecting religious expression has long been seen as logical, and has received bipartisan support in a variety of contexts. The Equal Access Act passed by a huge margin with bipartisan support in 1984, granting religious clubs in public high schools the same rights given to other student clubs. It was a widely held belief that religious expression and activity should be protected in public schools. In 1995, President Clinton issued a memorandum in support of religious expression in public schools, directing the Department of Education and the Department of Justice to educate schools about and to uphold the Equal Access Act.²⁰

In addition, organizations that “span the ideological, religious and political spectrum” joined together to support the Equal Access Act because they shared “a commitment both to the freedom of religious practice and to the separation of church and state such freedom requires.”²¹

Similar national legislation is needed to protect college students.





YOU CAN HELP SOLVE THIS PROBLEM.

Universities need to stop discriminating against students on the basis of their religious beliefs when they simply want to gather together as a faith-based community. True religious diversity is necessary to serve a religiously diverse student body.

The simple solution is to ensure that religious student groups are able to flourish and contribute to the diverse campus communities where they are located. Only then can authentic faith communities continue to provide safety and belonging, contribute to the emotional health and wellbeing of students, and inspire students to care for their communities, both locally and globally.

University of Florida law students from the Christian Legal Society chapter hosted a breakfast for the homeless in partnership with the local charity St. Francis House.

Appendix 1: More stories of how religious student organizations are making a difference

1: Hurricane Relief Renews Homes and Hearts

Hurricane Harvey tore through Houston during the first week of Mandy's freshman year at the University of Kansas.

Seeing and hearing about the devastation, she immediately wanted to help, and as fall break approached, she started making plans. She talked with the leaders of Cru at KU, and they connected her to people doing relief work in Houston. She gathered six more interested students to join her, and on a Friday in October, they all piled onto a car and drove south. They stayed at a church in the Houston area, joining other groups of students, including Cru students from Minnesota. Their first morning, the relief organization gave them a short training and then brought them to a neighborhood where they tore out cabinets and stripped moldy walls and floors.

"The people we were with saw the work as not just tearing down things, but helping take care of someone's life," Mandy says. "If someone in the group [made a relational] connection with the homeowner, they spent time talking with them, listening to their story."

The residents of one home they worked in loved to dance, she says.

"They would turn on music and taught us line dancing right in the homes that had been flooded. It stuck with me."

On Sunday, they helped sort donations for a charity drive. In this time of crisis, Mandy was humbled as she watched people from trailer parks and from wealthy neighborhoods bring what they had left to share and take what they needed from the drive.

There was so much devastation.

"When you see something like this on the news, it makes you thankful it didn't happen to you," she says. "But to be in the middle, and not even the worst areas, was really breathtaking. It changes your perspective...it makes you think about how you react to adversity."

Mandy plans to return and help with the next stage of rebuilding. But she also wants to use her new perspective to help her fellow students right at KU.

"Let's change the perception of what the college experience is supposed to be; instead of using college as a free time to do crazy things, use it to do exceptional things and to be part of a greater purpose."



2: From Cal Poly to Compton: Living Life for the Love of Others

Aeva was immediately interested when she heard about Urban Immersion — an opportunity to spend her spring break serving others in Compton, CA. Growing up near the inner city, she already had a desire to work with the marginalized, like at-risk youth and the homeless. She heard about the opportunity through Cru at California Polytechnic State University (Cal Poly).



Her week was both eye-opening and difficult, as she learned how to serve and love the homeless, impoverished, racially excluded, and overlooked by society. She learned to see the people she worked with as equal contributors and mentors and how vital this was for success.

“The people you have empathy for extends to who you consider to be ‘us,’” Aeva says. “Who would you associate with? The Compton trip does a great job helping students see other people’s needs and interact with others who are different from [them]. It expands your empathy, compassion, and desire to help people that don’t necessarily look like you.”

Because of the impact of that first spring break, Aeva joined Cru’s Urban Immersion for a second time the next year.

Those experiences grew her passion for serving people who are different from her — whether socioeconomically or racially, and she decided to pursue a major in ethnic studies. She hopes to be a learner of other cultures, to serve them state-side, and to help incorporate the marginalized into society. She also hopes to apply what she’s learned and experienced from her involvement with Cru at Cal Poly.

“I didn’t realize people could care for and love other people as much as they do until I came to Cru,” Aeva says.

3: Furthering Careers While Fostering Faith

Student chapters of religious organizations like the Christian Medical and Dental Association (CMDA) offer support for graduate students, as well as resources, networking, and educational opportunities through connections with their national organization.

CMDA also connects medical and dental students to international mission hospitals and community programs, where they’re able to serve those in need and marginalized throughout the world.

Working in these locations allows students to apply their medical skills and their faith as they save and change lives. They also

Each semester, the Christian Medical and Dental Association chapter in Memphis, Tennessee, chooses an underserved area of the city to provide with free dental care. In September 2018, professionals and students joined with Youth United With Senior Citizens (YUWSC) to serve a needy North Memphis community.



gain valuable experience in their field as they work under the oversight of professors or licensed medical personnel.

Returning from these trips, students say they've gained skills, compassion, and vision for future service as medical professionals.

One student, a third-year resident who served in Asia, says the four weeks of morning rounds, formal lectures, home visit surveys, chart reviews, and health outreaches were invaluable.

"Clinically, I experienced the tension that exists when resources and infrastructure are lacking while I watch a patient suffer from disease," he says. "I was challenged by the struggle of balancing cultural humility and medical necessity — respecting 'the way things are done' while striving to encourage improvement.

"At the same time, I have started to make beautiful relationships with the wonderful staff. We have discussed cases together, disagreed and agreed on management plans, and ultimately learned together. Through these interactions, I've learned how to approach their views with both respect and curiosity, which has been a valuable lesson for me to take home. I can honestly say that I've not only found colleagues, but friends. I hope to continue to foster these relationships as I plan on returning in the near future.

"Overall, this rotation was extremely valuable for my clinical and my spiritual growth. I think it has spurred on many ideas and questions for what my future career will hold in regards to medicine and global health."

Student organizations from Jewish, Catholic, and Protestant faiths at the University of San Diego School of Law co-hosted a "Thank You Staff Thanksgiving Breakfast," where they presented personal thank you notes to the law school staff.

Several religious student organizations sponsored an event at University of Wisconsin, River Falls, about what it means to love people radically, where Mary Poplin shared about her experience serving under Mother Teresa.

Students from a religious student organization at University of Southern California spent their spring break serving at a refugee camp in Greece.

More than 75 Penn State students with the Navigators student group went on a spring break trip to Virginia Beach, where they worked on service projects for military families.

Law students with the Harvard Law School Christian Fellowship partnered with a local ministry to serve the homeless community of Cambridge. Guests received a warm meal, a shower, and a fresh change of clothes. The students enjoyed engaging with and hearing the stories of the guests.



4: A Truck on Campus: How Cru Rallied UConn to Help Puerto Rico

When Hurricane Maria blasted across Puerto Rico, the student leaders for Cru at the University of Connecticut decided that they wanted to help.

This seemed like a crazy, insurmountable task, according to Matt — one of those students. “But if we all came together and pooled our resources, if we joined forces on this one cause, we could do this amazing work,” he says. “We pulled this idea from the Bible: ‘clothe yourself with compassion.’”

They reached out to other faith-based student organizations, resident groups, and Greek houses, challenging the campus community to donate specific priority items from a list provided by GAIIN, the humanitarian partner of Cru.

The Cru students were given permission to park a truck in the center of campus, where they collected extension cords (61), gas cans (27), buckets (138), batteries (2,036), blankets (45), tarps (83), soap bars (915), feminine hygiene items (3,262), and diapers (5,675).

Student groups, sports teams, and university offices pooled money to purchase 13 generators.

Students from Navigators student group at University of Georgia went to Baton Rouge in the Spring of 2017 to clean and repair after flood damage.



Alisha, a student with Cru, volunteered at the donation truck, where she could see her university community come together around their shared desire to help.

"It was really cool watching people coming and joining us from completely different backgrounds and beliefs," Alisha says. "They all had the same goal to make a difference where people had been hurt. ... We were out there getting to hear their stories — meeting people dropping things off."

Then, in the spring, Cru worked with GAIN to organize and send a team of 25 students to serve Puerto Rico over their spring break. The students cleaned moldy wood and furniture from schools and houses. They walked people through application paperwork for federal disaster aid. They listened to people's haunting stories of loss and resilience, and showed that, six months later, the people of Puerto Rico weren't forgotten.

"I really wanted to see the impact we had in the communities we were hoping to serve," Matt says.

One school where they worked hadn't been used since the hurricane hit. On the whiteboard in one classroom, they could still see a date written back in September.

"Having my hands working away at the mold and talking with people," Matt says. "Seeing these students back in school [nearby]. It meant a lot."

Now, back on campus this fall, UConn Cru students are excited to continue partnering with faith-based and other groups on campus to meet local and global needs.

"We can all work together on different things," Alisha says. "When we have something on our heart we want to help with [now we can] pass it off to another group: 'Would you be interested in heading this up? And we'll be supporting you!'"

¹ The 2014 U.S. Religious Landscape Study, Pew Research Center.
<http://www.pewforum.org/religious-landscape-study/educational-distribution/college/>.

² Eagan, M. K., Stolzenberg, E. B., Zimmerman, H. B., Aragon, M. C., Whang Sayson, H., & Rios-Aguilar, C. (2017). The American freshman: National norms fall 2016 (HERI 2016), Los Angeles: Higher Education Research Institute, UCLA.

³ Patel, Eboo, Promoting Campus Diversity, Don't Dismiss Religion, The Chronicle of Higher Education, March 11, 2015.

⁴ HERI 2016, op. cit., p.40.

⁵ Bryant, A. N. (2007) "The Effects of Involvement in Campus Religious Communities on College Student Adjustment and Development," Journal of College and Character, 8:3, p.4, DOI: 10.2202/1940-1639.1178 (citing Emmons, Cheung, & Tehrani, 1998; Fetzer Institute and the National Institute on Aging Working Group, 1999).

⁶ Rockenbach, A. N., Mayhew, M. J., Correia-Harker, B. P., Dahl, L., Morin, S., & Associates. (2017). Navigating pluralism: How students approach religious difference and interfaith engagement in their first year of college, Chicago, IL: Interfaith Youth Core. Interfaith Diversity Experiences & Attitudes Longitudinal Survey (IDEALS study), p.2.

⁷ Wickliffe, K., Mayhew, M. J., Behringer, L. B. (2009), "Developing an Assessment of College Students' Spiritual Experiences: The Collegiate Religious and Spiritual Climate Survey," Journal of College and Character, 10:6, p.5.

⁸ Rosenberger v. Rector and Visitors of Univ. of Va., 515 U.S. 819, 828 (1995).

⁹ Rosenberger, 515 U.S. at 830.

¹⁰ Rosenberger, 515 U.S. at 845-846.

¹¹ Widmar v. Vincent, 454 U.S. 263, 273 (1981).

¹² Hosanna-Tabor Evangelical Lutheran Church and School v. EEOC, 565 U.S. 171, 188 (2012).

¹³ Heart+Mind Strategies (2014).

¹⁴ The policy stated that student organizations must affirm that they "will not limit membership and participation in organizational activities" based on any of the listed categories. See UNC RSO Constitution Guide for 2018-19.

¹⁵ Widmar v. Vincent, 454 U.S. 263 (1981).

¹⁶ Healy v. James, 408 U.S. 169, 181 (1972).

¹⁷ Widmar, 454 U.S. at 269.

¹⁸ See Rosenberger v. Rector & Visitors of the Univ of Va., 515 U.S. 819, 834 (1995).

¹⁹ See Hosanna-Tabor Evangelical Lutheran Church & Sch. v. EEOC, 565 U.S. 171 (2012).

²⁰ "President's Memorandum on Religious Expression in Schools," New York Times, July 13, 1995.

²¹ Religion in the Public Schools: A Joint Statement of Current Law (New York: American Jewish Congress; 1995), p.3.



