

The Development of the Separation of Church and State in the United States:  
An Historical Survey  
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The legal locus of the separation of church and state in the United States of America is a clause in the First Amendment of the Constitution commonly known as the Establishment Clause.

*Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.*<sup>2</sup>

The history that led to the creation and adoption of this clause traces back to pluralistic religious foundations of the United States. In fact, the roots of the separation of church and state in the United States go back to the period of European history called the Reformation but only came to fruition two hundred fifty years later in the Enlightenment

European intellectual history was not, of course, the only factor leading to the formulation and ratification of the First Amendment in 1789. The interaction of church and state in the thirteen colonies also played a significant role in adoption of the First Amendment.

The Dutch who settled Manhattan and the English who settled New England came to the United States for different reasons: the Dutch came to America generally for economic reasons,<sup>3</sup> while many of the English came to America for religious freedom.<sup>4</sup> However both the Dutch, who identified themselves as 'Reformed', and the English, who were called 'Puritans' came from a religious tradition steeped in the theology of John Calvin. To understand the influence of John Calvin's theology on the American colonies we need to go back to Calvinism's roots in the Reformation.

The Reformation began when Martin Luther, a Roman Catholic priest in Wittenberg, Germany, attempted to reform the Roman Catholic Church from within, but ended up starting a religious and political revolution across Europe. The Reformation brought with it a redrawing of lines both within the church and between nations. One of the products that came out of the Reformation was a new diversity in the way churches and civil governments relate with each other.

England separated from the Roman Catholic Church after it refused to grant Henry VIII an annulment from his Catholic wife to marry a sympathizer of the growing

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<sup>2</sup> Bill of Rights: Amendment I. Ratified December 15, 1791

<sup>3</sup> Shorto, R. (2004). Chapter 2. *The Island at the Center of the World*. New York: Vintage Books.

<sup>4</sup> MacCullough, D. (2010). Chapter 20. *Christianity*. New York: Viking Penguin.

Reformation.<sup>5</sup> In creating the Church of England, King Henry broke away from the Catholic Church yet kept England with an established church.

In Zurich, Switzerland under the leadership of Huldrych Zwingli, the city council and the clergy working together, rather than a monarch, became the governing authority in the city and the church.<sup>6</sup>

Finally, in Strasburg, Germany and, a few years later, in Geneva, Switzerland, we find what, in 16<sup>th</sup> century Europe, became the first seeds of the separation of church and state that resemble the form of church-state separation currently found in the United States. In Strasburg, Martin Bucer envisaged a fourfold order for governing the church that consisted of Pastor (Clergy), Professors (Teachers), Elders and Deacons. The church was governed by committee, rather than by civil authorities or by a bishop. The great reformer, John Calvin, would then bring this model to Geneva, Switzerland, where it eventually took root and flourished.<sup>7</sup> In 1541 Calvin had a series of Ecclesiastical Ordinances that the civil government approved, that placed the government of the church in the hands of the Consistory which was made up of the clergy and twelve lay elders.<sup>8</sup> It was here finally, that church and state were separate even though they maintained a close working relationship, and influenced each other, although "The church had a mind of it's own over and against temporal power."<sup>9</sup> It is important to note that the city council approved the first consistory, but it eventually became a self-perpetuating body.

John Calvin clearly saw that there were two kingdoms, two separate but parallel systems of legitimate authority. Both were instituted by God. Evidence for this, Calvin argued, could be found in the biblical text, Romans 13:1-7:

*Let every person be subject to the governing authorities; for there is no authority except from God, and those authorities that exist have been instituted by God. Therefore whoever resists authority resists what God has appointed, and those who resist will incur judgment. For rulers are not a terror to good conduct, but to bad. Do you wish to have no fear of the authority? Then do what is good, and you will receive its approval; for it is God's servant for your good. But if you do what is wrong, you should be afraid, for the authority does not bear the sword in vain! It is the servant of God to execute wrath on the wrongdoer. Therefore one must be subject, not only because of wrath but also because of conscience. For the same reason you also pay taxes, for the authorities are God's servants, busy with this very thing.*

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<sup>5</sup> MacCulloch (2010) pg. 626

<sup>6</sup> Ibid. pg 616

<sup>7</sup> Ibid. pg 633

<sup>8</sup> Gonzolalez, J. (1985). *The Story of Christianity. Volume 2.* New York: Harper Collins. pg. 67.

<sup>9</sup> MacCulloch (2010) pg. 637

Each kind of government, spiritual and political had its proper role and purpose. Calvin called these the “spiritual” and “temporal” jurisdictions.<sup>10</sup> One has to do with the life of the soul, the other to do with political and social relationships. The latter takes into consideration the laws which are needed to live among fellow humans wholly and honorably. The spiritual jurisdiction takes into consideration those things that are necessary to live with God eternally. The spiritual jurisdiction is internal. The temporal is external. While they may relate to and influence one another, they are in the end two separate things, even though both stem from God.

John Calvin had a clear vision for keeping church and state governments separate. In the state-run church he found too many points of possible corruption. In the *Institutes of the Christian Religion* he states that “from one side, insane and barbarous men furiously strive to overturn (God’s) divinely established order; while, on the other side, the flatterers of princes, immoderately praising their power, do not hesitate to set themselves against the rule of God himself. Unless both these evils are checked, purity of faith will perish.”<sup>11</sup> One evil is that the leaders of a powerful church will use religion for their own ends. The other evil is the public officials who use their civil power to accomplish things that go against God’s divine will. The check against these evils is to have both a civil authority and an ecclesiastical authority to balance each other and mitigate the potential evils of both. What Calvin created was not a complete separation, but a way for civil and religious structures to work together for the good of the people.

Calvin’s structures and theology eventually spread from Geneva, taking hold in places like the Netherlands and England.<sup>12</sup> The Reformers in the Netherlands maintained a moderate application of Calvin’s theology. In the Netherlands, the Reformed Church became the national church to which most common citizens belonged. Though the government prescribed which liturgy to use and which doctrines to believe, the church still enjoyed some autonomy.<sup>13</sup> This was balanced by the Dutch government not wanting any one denomination to have a monopoly. To this end, the Dutch government allowed citizens not to participate in the Church as long as they “did not cause trouble.”<sup>14</sup>

In England, the Calvinists were zealots who wanted to continue to push the Reformation further. They were ostracized and called *Puritans*. While this was initially meant to be a derogatory term, *Puritan* turned into a compliment.<sup>15</sup> It was these Puritans who fled England and eventually ended up settling what became the northeastern part of the United States. Having been abused and mistreated by the church/state complex in England, they were careful to keep the two separate in their “New England.”

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<sup>10</sup> John Calvin, *Calvin: Institutes of the Christian Religion*, trans. from the 1559 Latin ed. by Ford Lewis Battles, 2 vols., in *Library of Christian Classics*, ed. John T. McNeill (Philadelphia: The Westminster Press, 1960), 3.19.15

<sup>11</sup> *Institutes* 4.20.1

<sup>12</sup> MacCulloch (2010) pg. 637

<sup>13</sup> Meeter, D (1993). *Meeting Each Other*. Grand Rapids: Wm. B. Eerdmans. pg. 31

<sup>14</sup> MacCulloch (2010) pg. 640

<sup>15</sup> MacCulloch (2010) pg. 650

They took this separation seriously. Steven Carter of Yale Law School notes:

*The Puritans certainly understood the problem, which was why they took marriage away from the priests. In Protestant New England, it was actually against the law for a member of the clergy to officiate at a wedding. The justice of the peace, an individual with no clerical function, was required to perform the ceremony. In this way, the Puritans "separated" the church from the state.<sup>16</sup>*

Their motive was to keep the church pure and free from any civil duties that might impinge on the church's freedoms. Though this is an extreme extension of Calvin's thought, it was one of the influences that came to bear in the First Amendment's prohibition of any establishment of religion.

Even though the spiritual and secular powers were separate, they did work closely together and were influenced by each other. At times there seemed to be little difference between the two. The civil government of the Puritan's that settled Massachusetts and later Connecticut were charged with making sure that churches enforced a basic "Confession of Faith." While individual congregations governed themselves, the civil government served as guardian.<sup>17</sup> Here the state did not run the church but instead served as a protector of it. Later as the Massachusetts colony grew and non-Puritans started to settle and gain influence in government, even establishing an Anglican church in Boston, the congregational Puritans lobbied for government not to interfere in their churches.<sup>18</sup> At the same time it was the civil government that stepped in and stopped the Salem witch trials that were being run by the church.<sup>19</sup> This points to a separation, but also shows that the line between the church and state was often blurred.

When Roger Williams, initially a Calvinist minister<sup>20</sup>, came to Massachusetts, he found that the church had given too much power to the civil government in matters over the church. He held the belief, like Calvin, that civil authorities should be given authority over matters that apply to the ordering of society and that the church should enforce the commandments dealing with a person's relationship to God. He would eventually be exiled from Massachusetts. Williams went on to found a colony in Providence, Rhode Island and base his colony on the principle of religious freedom. He did this because he felt that for worship to be sincere it could not be forced.<sup>21</sup>

The Dutch who settled Manhattan, like the Puritans, were Calvinists, though they were not as strict in their Calvinist theology as the Puritans were. For the Dutch the church was the church and the state was the state, though the two also worked closely

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<sup>16</sup> Carter, Stephen L., "Reflections on the Separation of Church and State" (2002). Faculty Scholarship Series. Paper 2270. [http://digitalcommons.law.yale.edu/fss\\_papers/2270](http://digitalcommons.law.yale.edu/fss_papers/2270)

<sup>17</sup> Gonzalez (1985) pg. 224

<sup>18</sup> MacCulloch (2010). pg. 722

<sup>19</sup> Gonzalez (1986.) pg. 223

<sup>20</sup> MacCulloch (2010). pg. 273

<sup>21</sup> Gonzalez (1986). pg. 223

together. In the Netherlands, the Reformed Church was the national church in the sense that it was the “public” and “privileged” church. This meant that it could hold property and all people were encouraged to join it, though it was a separate entity from the state and other churches were tolerated.<sup>22</sup> In the end though, the church made its own decisions when it came to the life of the church and asked that the state leave religious matters to it, even as the church abdicated civil matters to the government.<sup>23</sup> This was both good for the church, it could make its own rules, but also good for the state as it made for good business. The more people there were in a colony, the more opportunity there was for commerce.

This relationship between church and state allowed for great diversity of both ethnicity, nationality, and religion in the colony of New Amsterdam that later became New York. This separation and freedom of choice became valuable to the creation of the United States that would be born out of the revolution begun with the Declaration of Independence July 4<sup>th</sup>, 1776.

Before the Declaration of Independence, the Flushing Remonstrance was ratified and is considered to be one of the first formal declarations of religious tolerance in the United States. While there is no direct evidence to show that the Flushing Remonstrance directly influenced the First Amendment, which officially establishes that “there shall be no laws regarding the establishment of religion, or prohibiting free exercise thereof”<sup>24</sup>, there are strong similarities between the Flushing Remonstrance and the First Amendment. The Flushing Remonstrance was written to protest the Dutch governor’s persecution of English Quakers. It states:

*And for those jealousies and suspicions which some have of them, that they are destructive unto Magistracy and Ministry, that cannot bee, for the Magistrate has his sword in his hand and the Minister has the sword in his hand, as witness those two great examples, which all Magistrates and Ministers are to follow, Moses and Christ, whom God raised up maintained and defended against all enemies both of flesh and spirit; and therefore that of God will stand, and that which is of man will come to nothing. And as the Lord has taught Moses or the civil power to give an outward liberty in the state, by the law written in his heart designed for the good of all, and can truly judge who is good, who is evil, who is true and who is false, and can pass definitive sentence of life or death against that man which arises up against the fundamental law of the States General; so he hath made his ministers a savor of life unto life and a savor of death unto death.*

*The law of love, peace and liberty in the states extending to Jews, Turks and Egyptians, as they are considered sons of Adam, which is the glory of the outward state of Holland, so love, peace and liberty, extending to all in Christ Jesus, condemns hatred, war and bondage. And because our Savior says it is*

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<sup>22</sup> Meeter (1993.) pg. 31

<sup>23</sup> MacCulloch (2010) pg. 640

<sup>24</sup> Shorto (2004) pg. 276

*impossible but that offences will come, but woe unto him by whom they cometh, our desire is not to offend one of his little ones, in whatsoever form, name or title he appears in, whether Presbyterian, Independent, Baptist or Quaker, but shall be glad to see anything of God in any of them, desiring to do unto all men as we desire all men should do unto us, which is the true law both of church and state; for our Savior says this is the law and the prophets.*<sup>25</sup>

The protestor of the Dutch Governor's actions point to the Netherlands, a Christian nation, that had extended liberty and freedom of religion to not only Christians, but also Jews and Muslims as well. It was this liberty that allowed not only the church to be separate from the state, but also for other religions to find a place in society as well. Granting the separation of church and state, at minimum, opened up religious freedom for New Amsterdam, later New York colony. The Flushing Remonstrance also notes that Christians, Jews and Muslims are all sons of Adam.

The Flushing Remonstrance claims that separation of church and state can be seen in the roles of Moses who gave the divine civil law, and Jesus who gave laws of spiritual life, which they saw as the primary function of religion. It echoes Calvin's separation of church and state that holds while both church and state are institutions of God, they are indeed meant to be separate powers in the world with different functions.

Between the early 1600's when the Puritans settled New England and the Dutch settled New Amsterdam and the late 1700's when the First Amendment of the Bill of Rights was adopted, the thirteen colonies that would become the United States continued to become ever more religiously diverse as adherents of new and different religious groups came to the colonies. Religion during this era became a matter of choice, and there were many different sects of Christianity from which to choose.

Because there was much diversity among the religions and much diversity among Christians in particular, the Founding Fathers of the United States wanted to treat religion as a private matter. To this end, there is no mention of God or Christianity in the Constitution. The Founders' intention was to keep the government out of the affairs of the church and to respect the right of their fellow citizens to freely choose and live out their own religious convictions as well.<sup>26</sup>

As we wrap up the theme of the influence of Calvinism on the separation of church and state, we turn to another cause, the history of Protestant-Catholic wars in post-Reformation Europe. While two thirds of the signers of the Constitution were formally Anglican, many of them held Deist views of God and Religion.<sup>27</sup> These views sprung out of the Enlightenment that began after a period of bloody religious wars.

The Peace of Augsburg, concluded in 1555 between the Catholic Emperor Charles V of Hapsburg and an alliance of Lutheran princes, called the Schmalkadic

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<sup>25</sup> <http://www.nyym.org/flushing/remons.html> (Original Language modified to make more suitable for translation)

<sup>26</sup> MacCulloch (2010) pg. 764

<sup>27</sup> MacCulloch (2010) pg. 763

League, was the first treaty that attempted to create a peaceful existence between Protestants and Catholics in Germany. Under the terms of the Peace of Augsburg, local rulers would decide if their jurisdiction would be Catholic or Protestant. For some, this required relocation to a province that matched their beliefs.

In 1618 the Thirty Years war began. It was fought along both religious and political lines. By the end of the Thirty Years War, most of mainland Europe had become involved. The Thirty-Years War is considered to be one of the bloodiest periods in European history.

The Thirty Years War was ended by the Peace of Westphalia. This treaty protected freedom of religion for local rulers and their subjects, meaning they would be free to follow any of these three major Christian confessions, Roman Catholic, Lutheran, or Reformed. Even though the Peace of Westphalia did not establish total freedom for adherents of all religions, it shaped the beginnings of a broader religious tolerance, a tolerance perhaps motivated less by altruistic Christian ideals than by a pragmatic need for peace.

Christian historian Justo L. Gonzalez notes:

*The principles of tolerance of the Peace of Westphalia were not born out of a deeper understanding of Christian love, but rather a growing indifference to religious matters. The war had amply shown the atrocities that resulted from attempting to settle religious matters by force of arms.<sup>28</sup>*

One thing that the Thirty Years War taught Western society was that when the state takes sides in religious controversies, the outcome usually is not good for those in power. As a result of the Thirty Years War, foreign powers gained territory that once belonged to Germany, and governmental structures no longer functioned in the ways they had previously.

At the same time as the Thirty-Years War on the continent of Europe, changes were also taking place in England. James I, who was known in Scotland as James IV, united England and Scotland when he succeeded Elizabeth I. James, though originally a devout Reformed Protestant, resented the Church of Scotland's view that the church had the divine right to tell him what to do.<sup>29</sup> So once he assumed the throne of England he attempted to use the Anglican Church hierarchy to increase his own power. King James is rumored to have said "without bishops, there is no king."<sup>30</sup> This led eventually to civil war and prolonged civil unrest. The unrest continued even after return of King Charles II to his father's throne and the re-establishment of the Church of England.<sup>31</sup> Despite the Church of England's re-establishment, many sects and dissenting religions remained in England.

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<sup>28</sup> Gonzalez (1985). pg. 140

<sup>29</sup> MacCulloch (2010.) pg. 647

<sup>30</sup> Gonzalez (1985). pg. 152

<sup>31</sup> MacCulloch (2010). pg. 653

During the century and a half following the Thirty-Years War (which ended in 1646) and the English Civil War (which ended in 1651) the inhabitants of the thirteen American colonies began to realize that establishing any single church might not be good for the colonies. In his book on Thomas Jefferson, John Meacham notes:

*In his Notes on the State of Virginia, a book written a few years after his service revising the laws in the General Assembly, Jefferson was honest about his state's abysmal record on liberty of conscience. It was a crime in Virginia not to baptize infants in the Anglican Church; dissenters were denied office, civil or military; children could be taken from their parents if the parents failed to profess the prescribed creeds.*<sup>32</sup>

In order to protect the government and to protect all the people within its boundaries, there needed to be a separation between church and state. Jefferson worked on legislation in Virginia that granted religious liberty to non-Anglican Christians, Jews, Muslims, Hindus, and everyone else who lived in Virginia.<sup>33</sup>

Thomas Jefferson was one of the main figures of the founding of the United States. The First Amendment forbidding the establishment of a religion was a direct result of Virginia's law on religious freedom drafted by Jefferson. Later Jefferson would coin the term 'a wall of separation between church and state' in writing about the First Amendment. Although Jefferson was describing the impact of the First Amendment on the federal government rather than on the state governments, by 1833 all of the states that had established religions had adopted their own equivalents of the First Amendment ending established state churches.<sup>34</sup>

It is also important to note that Thomas Jefferson was influenced by John Locke<sup>35</sup>, whose thought was a precursor to the philosophical school called Deism. Deism emerged out a desire to move beyond the conflicts produced by a strict adherence to any one orthodoxy while at the same time affirming the existence of a deity.<sup>36</sup> Deism maintains that human reason has the final authority in religion and theology. For Deists "God was a benevolent, if distant, creator whose revelation was nature and human reason. Applying reason to nature taught most deists that God organized the world to promote human happiness and our greatest religious duty was to further that end by the practice of morality."<sup>37</sup>

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<sup>32</sup> Meacham, Jon (2012-11-13). Thomas Jefferson: The Art of Power (pp. 122-123). Random House Publishing Group. Kindle Edition.

<sup>33</sup> Meacham, Jon (2012-11-13). Thomas Jefferson: The Art of Power (p. 124). Random House Publishing Group. Kindle Edition.

<sup>34</sup> MacCulloch (2010). pg. 764

<sup>35</sup> Meacham, Jon (2012-11-13). Thomas Jefferson: The Art of Power (p. 259). Random House Publishing Group. Kindle Edition.

<sup>36</sup> Gonzalez (1985.) pg. 190

<sup>37</sup> Staloff, Darren. "Deism and the Founding of the United States." Divining America, TeacherServe©. National Humanities Center. May 15<sup>th</sup>, 2013. <<http://nationalhumanitiescenter.org/tserve/eighteen/ekeyinfo/deism.htm>>



As noted above, while more than half of the Founding Fathers of the United States were Anglicans, many of these Anglicans were also Deists or adherents of a more “natural theology.” Evidence of this is found throughout the Constitution. There is no mention of God or Christianity in the Constitution, other than to reference a “Creator” and “supreme judge of the world” and to mark the date, as the “Year of our Lord.” The Great Seal of the United State of America bears no Christian symbols; the words “In God We Trust” didn’t appear on American currency until 1864 three years into the Civil War.<sup>38</sup>

Given the influence of Deism, it is easy to understand that the authors of the Constitution and the Bill of Rights saw the separation of church and state as an obvious good. The epitome of human reason would be a government in which rational people made laws, not based on divine revelation, but on human wisdom and reasoning. If a church were to be established as the official Church, no longer would human reason be the authority, but the particular divine revelation held by the church or religion in control. While not denying the existence of God, Deism placed responsibility for governance in the hands of human beings. At the time of the founding fathers, this meant that authority was most often located in the educated affluent class.

Further, while Deism placed an emphasis on human reason, it left room for God as well. Even though the founding fathers separated church and state, it did not mean that for them faith and religion were unimportant or intended by them to be wholly separate from public life. Rather they realized how important faith and religion were to people; so important that they had created many conflicts and wars that had divided nations and peoples. In the new nation, in the new state that they were forming, they wanted to learn from history and to create a place where people could freely worship God and faith had an influence on civil matters. So instead of founding one “private religion” they formed what Benjamin Franklin called a “public religion.”<sup>39</sup> “Public religion,” of in modern usage ‘civil religion’, speaks of God, but in generic ways.

Jon Meacham in his book *American Gospel* says this about the Founding Fathers and the notion of a “public religion”:

*Properly understood, the God of public religion is not the God of Abraham or God the Father of the Holy Trinity. The Founding Fathers had ample opportunity to use Christian imagery and language in the Declaration of Independence and Constitution, but did not. At the same time, they were not absolute secularists. They wanted God in American public life, but, given the memory of religious warfare that could engulf and destroy whole governments, they saw the wisdom of distinguishing between private and public religion. In churches and in homes, anyone could believe and practice what he wished. In the public business of the*

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<sup>38</sup> MacCulloch (2010). pg. 765

<sup>39</sup> Meacham, Jon (2007-03-20). *American Gospel: God, the Founding Fathers, and the Making of a Nation* (Kindle Locations 275-277). Random House Publishing Group. Kindle Edition.

*nation, however, it was important to the Founders to speak of God in a way that was unifying, not divisive.*<sup>40</sup>

This leads us to where the United States is today, a nation state in which religion and the church are important, but so is the independence of the state from religious control. There are currently many conflicts in which religion and politics overlap, especially in areas of healthcare, marriage, immigration, and property use. Talk of God and God's role in public life is still an active discourse in both civil and religious arenas. But underneath all the conflicts, there is still the principle that no one religion or Church can control the State and that the State can neither dictate how the church governs itself nor require people to belong to a church or other religious institution.

The founding fathers' hope that religion would not fracture the unity of their new nation has stood the test of time over the last two centuries. There was a civil war, but it was fought over slavery and not over the establishment of a particular religion or church.

Over the last two hundred and thirty seven years, the United States has become ever more diverse in its religious thought and practice. And while some churches and religious groups have clamored for the government to proclaim officially that the United States is a "Christian nation", no president has come close to doing so.<sup>41</sup> Instead the notion of a "public religion" has become firmly planted in the hearts and minds of Americans. Jon Meacham says it eloquently:

*It is, rather, a habit of mind and of heart that enables Americans to be at once tolerant and reverent—two virtues of relevance to all, for the Founders' public religion is consummately democratic. When a president says "God bless America" or when we sing "America! America! God shed his grace on thee," each American is free to define God in whatever way he chooses. A Christian's mind may summon God the Father; a Jew's, Yahweh; a Muslim's, Allah; an atheist's, no one, or no thing. Such diversity is not a prescription for dissension. It is part of the reality of creation.*<sup>42</sup>

Moving forward, the United States of America and the churches and religions that are present within its borders, will need to continually reevaluate the respective roles of faith and politics, and faith and government. As Christian churches and denominations find themselves in an ever increasing racial, ethnic, and religious diversity that is a part of creation and part of the United States, they will need to find ways to actively live out their faith while at the same time living under a government that was designed to be the

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<sup>40</sup> Meacham, Jon (2007-03-20). American Gospel: God, the Founding Fathers, and the Making of a Nation (Kindle Locations 301-306). Random House Publishing Group. Kindle Edition.

<sup>41</sup> Meacham, Jon (2007-03-20). American Gospel: God, the Founding Fathers, and the Making of a Nation (Kindle Location 308). Random House Publishing Group. Kindle Edition.

<sup>42</sup> Meacham, Jon (2007-03-20). American Gospel: God, the Founding Fathers, and the Making of a Nation (Kindle Locations 309-314). Random House Publishing Group. Kindle Edition.

government of all people who are citizens, not just Christians. For some Americans this may feel threatening, as they sense a loss of power and influence. At the same time, it may spark a healthy reassessment of the separation of church and state as “churches” now include more religious groups than ever before living together in United States. In the end though, American’s passion for religion will not go away, and faith will remain a vital part of the fabric of America. The church and the state will need to remain separate, but become more able to work together for the good of all.