

Religious Freedom, LGBT Rights, and the Prospects for Common Ground

Edited by

WILLIAM N. ESKRIDGE, JR.

Yale University

ROBIN FRETWELL WILSON

University of Illinois Urbana-Champaign



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Appendix of Laws

Robin Fretwell Wilson

State		LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Adoption Protections Passed Alone Adoption Protections (Col. 7)
Alabama	RFRA Only: ALA. CONST. art. I, § 3:01 (constitutional amendment).				BROAD: ALASKA STAT. 18.80.300.		ALA. CODE § 26-10D-1 et seq. (2017).
Alaska	Heightened Scrutiny Only:				Larson v. Cooper, 90 P.3d 125, 131–32, n.31 (Alaska 2004); Swanner v. Anchorage Equal Rights Comm'n, 868 P.2d 274 (Alaska 1994).		
Arizona	RFRA Only: ARIZ. REV. STAT. ANN. § 41-1493:01, et seq. (2016).				BROAD: ARIZ. REV. STAT. ANN. §§ 41-1441, 41-1461, 41-1462, 41-1491.		

		INTERMEDIATE:	
Arkansas	RFRA & Heightened Scrutiny: ARK. CODE ANN. § 16–123–401, et seq. (2015); Gipson v. Brown, 749 S.W.2d 297 (Ark. 1988).	CAL. CIVIL CODE § 1135, 12920, 12940, 12949 (West 2016); see also Assemb. 2601, 1991–1992 Cal. Leg. Reg. Sess. (Feb. 11, 1992); Assemb. 196, 2003–2004 Leg., Reg. Sess. (Cal. 2003) (enacted 2003, became effective January 1, 2004).	BROAD: CAL. GOVT. CODE § 12926; CAL. CIVIL CODE § 51. CAL. REV. STAT. § 24–34–402, 24–34–501 (2014). <i>See also</i> Colorado
California	No RFRA or Heightened Scrutiny	CAL. CIVIL CODE § 1135, 12920, 12940, 12949 (West 2016); see also Assemb. 2601, 1991–1992 Cal. Leg. Reg. Sess. (Feb. 11, 1992); Assemb. 196, 2003–2004 Leg., Reg. Sess. (Cal. 2003) (enacted 2003, became effective January 1, 2004).	BROAD: CAL. GOVT. CODE § 12926; CAL. CIVIL CODE § 51. CAL. REV. STAT. § 24–34–402, 24–34–501 (2014). <i>See also</i> Colorado
Colorado	No RFRA or Heightened Scrutiny	CAL. REV. STAT. § 24–34–402, 24–34–501 (2014). <i>See also</i> Colorado	BROAD: COLO. REV. STAT. § 24–34–401, STAT. §§ 24–34–401,

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State	State Review of Neutral Laws (Col. 1)	LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Stand-Alone Adoption Protections (Col. 7)
Connecticut	RFRA Only: CONN. GEN. STAT. § 52–571b (West 2013).	CONN. GEN. STAT. §§ 46a–60, 46a–46c (West 2009). <i>See</i> <i>also</i> An Act Concerning Discrimination on the Basis of Sexual Orientation, Pub. Acts No. 91–58 (Reg. Sess.) (codified as amended at CONN. GEN. STAT.	BROAD: CONN. GEN. STAT. §§ 46a–62 (1) (2016).	CONN. GEN. STAT. § 46a–63 (1) (2016).	Passed just after judicial decision requiring same- sex marriage, Kerrigan v. Comm'r of Pub. Health, 289 Conn. 135, 140–41 (2008); 2009 Conn. Legis. Serv. § 19 (West); Conn. Gen. Stat. §	CONN. GEN. STAT. § 46b–35b (2009).	
		Anti-Discrimination Act, S. o8–200, 2008 Leg., (Colo. 2008).	24–34–402, 24–34– 601.				

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		§ 46a–64c (West 2009); An Act Concerning Discrimination, H.R. 6599, 2011 Leg., Reg. Sess. (Conn. 2011).	46a–64c (West 2009); CONN. GEN. STAT. §§ 46b–35b, 46b– 150d, 52–571b (2013); CONN. GEN. STAT. §§ 46a–63(1), 46a– 64c (2016).	DEL. CODE ANN. tit. 6, § 4502(14) (2014). See also An Act to Amend Titles 6, 9, 18, 19, 25, and 29 of the Delaware Code Relating to Discrimination in Employment, Public Works Contracting, Housing, Equal Accommodations and the Insurance Business, ch. 90, sec. 4, 77 Del. Laws 264 (2009) (codified as DEL. CODE ANN.
Delaware	No RFRA or Heightened Scrutiny	DEL. CODE ANN. tit. 19, § 711 (2014). See also An Act to Amend Titles 6, 9, 18, 19, 25, and 29 of the Delaware Code Relating to Discrimination in	Broad: DEL. CODE ANN. tit. 19 § 710; DEL. CODE ANN. tit. 6 §§ 4502, 4504.	DEL. CODE ANN. tit. 13 § 106 (West 2013);

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State	State Review of Neutral Laws (Col. 1)	LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Stand-Alone Adoption Protections (Col. 7)
District of Columbia	No RFRA or Heightened Scrutiny	Tit. 6, §§ 4603, 4604 (West 2014); Gender Identity Nondiscrimination Act, S. 97, 147th Gen. Assemb. (Del. 2013).	D.C. CODE § 2-1402.11, (LexisNexis 2012); D.C. Code § 2-1402.02.	D.C. CODE § 2-1402.02(24) (2015).	D.C. CODE § 2-1402.21 (2013).	D.C. CODE § 2-1402.21 § 46-406(e) (2013).	
		<i>See also</i> Human Rights Act of 1977, D.C. Law 2-38, title II, 24 D.C. Reg. 6038 (Dec. 13, 1977) (codified at D.C. CODE § 2-1402.21 (LexisNexis					

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2012); Human Rights Clarifications Amendment Act of 2005, Council Bill 16–389 (D.C. 2005).					
Florida	RFRA Only: FLA. STAT. § 761.01, et seq. (2016).	NARROW: FLA. STAT. §§ 760.02, 760.10.			
Georgia	No RFRA or Heightened Scrutiny				
Hawaii	Heightened Scrutiny Only: Dedman v. Board, 740 P.2d 28 (Haw. 1987).	HAW. REV. STAT. §§ 378–2, 515–3 (2015). Hawaii did enact a law in 2011 to clarify existing law with regard to sex discrimination on the basis of gender identity in employment. See A Bill for an Act Relating to Civil Rights, Act 76,	Intermediate: HAW. REV. §§ STAT. 378–1, 378–3, 489–2.	HAW. REV. § 489–2 (2015).	S. 1, 27th Leg., 2nd Special Sess. 2, 6 (Haw. 2013).

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State	LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Stand-Alone Adoption Protections (Col. 7)
State Review of Neutral Laws (Col. 1)	sec. 3, 2006 HAW. SESS. LAWS 214, 215 (codified as HAW. REV. STAT. § 489-3 (2015)); H.R. 546, 26th Leg. (Haw. 2011).					
Idaho	RFRA Only: IDAHO CODE § 73-402, et seq. (2016).	BROAD: IDAHO STAT. §§ 67-5902, 67-5910.				
Illinois	RFRA Only: 775 ILL. COMP. STAT. 5/102(A), 5/3-101 (2010). See also An Act Concerning Human Rights, Pub. Act No. 93-1078, art. 1, 2004 Ill. Laws 4837, 4838 (codified as 775 ILL. COMP. STAT. 5/102(A) (2010)).	INTERMEDIATE: 775 ILL. COMP. STAT. 5/102, 5/2-101, 5/5-101, 5/5-102.1.	ILL. COMP. STAT. 5/5-101(A) (2010).	S. 10 § 209(a- 10), 98th Gen. Assemb., Reg. Sess. (Ill. 2013); 775 ILL. COMP. STAT. 5/3-101, 5/ 5-102.1 (2010).		

Indiana RFRA & Heightened Scrutiny: IND. CODE § 34-13-9-1, et seq. (2016); City Chapel Evangelical Free Inc. v. City of South Bend, 744 N.E.2d 443, 445-51 (Ind. 2001); Church of Christ v. Metropolitan Board of Zoning Appeals, 371 N.E.2d 1331 (Ind. Ct. App. 1978).	IND. CODE § 22-9-1-3.	IOWA CODE No RFRA or Heightened Scrutiny: Iowa § 216.2, 216.8 (2016). See also An Act Relating to the Iowa Civil Rights Act and Discrimination Based Upon a Person's Sexual Orientation or Gender Identity, S. 427, 82d Gen. Assemb., Reg. Sess. § 1 (Iowa 2007).	IOWA CODE §§ 216.2(13) (2016).
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		LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Stand-Alone Adoption Protections (Col. 7)
Kansas	RFRA & Heightened Scrutiny:	KAN. STAT. ANN. § 60-5301, et seq. (2015); Lower v. Bd. of Dirs. of the Haskell Cnty. Cemetery Dist., 56 P.3d 235, 244-46 (Kan. 2002); State v. Evans, 796 P.2d 178 (Kan. Ct. App. 1990).	KAN. STAT. ANN. § 44-1002.	INTERMEDIATE: KAN. STAT.			
Kentucky	RFRA Only:	KY. REV. STAT. ANN. § 446.350 (West 2015); Gingerich v. Commonwealth, 382 S.W.3d 835, 844 (Ky. 2012).	BROAD: KY. REV. STAT. §§ 344.030, 344.090, 344.130.				

Louisiana	RFRA & Heightened Scrutiny: LA. REV. STAT. ANN. § 135231, et seq. (2015); State v. Victor, 15–339 (La. App. 5 Cir. 5/26/16), 195 So. 3d 128.	BROAD: LA. REV. STAT. § 51:2232.	ME. REV. STAT. tit. 5, § 4582 (2015); 2005 Bill Text ME Only: Foltin v. Roman Catholic Bishop, 871 A.2d 1208, 1227–30 (Me. 2005); Rupert v. Portland, 605 A.2d 63 (Me. 1992).	INTERMEDIATE: ME. REV. STAT. tit. 5 § 4553; S.B. 413, PL1993, c. 327 (effective June 29, 2005). See also P.L. 2005, c. 7; § 1 (Me. 2005).	ME. REV. STAT. tit. 5, § 4553(8) (2015).	ME. REV. STAT. TIT. 19- A, § 655 (2013).
Maine	Heightened Scrutiny: LA. REV. STAT. ANN. § 135231, et seq. (2015); State v. Victor, 15–339 (La. App. 5 Cir. 5/26/16), 195 So. 3d 128.	ME. REV. STAT. tit. 5, § 4582 (2015); 2005 Bill Text ME Only: Foltin v. Roman Catholic Bishop, 871 A.2d 1208, 1227–30 (Me. 2005); Rupert v. Portland, 605 A.2d 63 (Me. 1992).	MD. CODE ANN., State Gov’t §§ 20–606, 20–705 (West 2015). See also H.R. 51, ch. 120, sec. 3 2009 v. Walsh, 770 A.2d m, 123 (Md. 2001).	INTERMEDIATE: MD. CODE ANN., State Gov’t §§ 20–606, 20–705 (West 2015). See also H.R. 51, ch. 120, sec. 3 2009 v. Walsh, 770 A.2d m, 123 (Md. 2001).	MD. CODE ANN., State Gov’t §§ 20–301 (West 2015).	MD. CODE ANN., LAW §§ 2–201, 2–202 (West 2013) (lacking amendments present in 2012 Md. Laws § 3);
Maryland	No RFRA or Heightened Scrutiny: Montrose Christian Sch. Corp.	MD. CODE ANN., State Gov’t §§ 20–606, 20–705 (West 2015). See also H.R. 51, ch. 120, sec. 3 2009 v. Walsh, 770 A.2d m, 123 (Md. 2001).	MD. CODE ANN., State Gov’t §§ 20–301 (West 2015).	MD. CODE ANN., LAW §§ 2–201, 2–202 (West 2013) (lacking amendments present in 2012 Md. Laws § 3);	MD. CODE ANN., LAW §§ 2–201, 2–202 (West 2013) (lacking amendments present in 2012 Md. Laws § 3);	MD. CODE ANN., LAW §§ 2–201, 2–202 (West 2013) (lacking amendments present in 2012 Md. Laws § 3);

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State	State Review of Neutral Laws (Col. 1)	LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Adoption Protections Passed Alone Adoption Protections (Col. 7)
Massachusetts	Heightened Scrutiny Only:	CODE ANN., State Gov't § 20-304 (West 2015); Fairness for All Marylanders Act of 2014, 2014 Md. Legis. Serv. ch. 474 (West) (codified at MD. CODE ANN., State Gov't § 20-101(e)).	MASS. GEN. LAWS, chap. 151B § 4 (2016). <i>See also</i> An Act Making It Unlawful to Discriminate on the Basis of Sexual Orientation, v. Desilets, 636	BROAD: MASS. GEN. LAWS, ch. 151B §§ 1, 4	2012 Md. Laws §§ 2-3; MD. CODE ANN., INS. § 8-402 (2013) (defining "fraternal organization").	MASS. GEN. LAWS, ch. 151B, § 4(8) (2016).	Stand-Alone Adoption Protections
							Passed Together with Other Legislation (Col. 6)

N.E.2d 233 (Mass. 1994).	1989 Mass. Acts 516; An Act Relative to Transgender Anti- Discrimination, S.735, 189th Gen. Ct. (Mass. 2016).	Heightened Scrutiny Only: McCready v. Hoffius, 586 N.W.2d 723, 729 (Mich. 1998), vacated on other grounds, 593 N.W. 2d 545 (Mich. 1999); Porth v Roman Catholic Diocese, 532 N.W.2d 195 (Mich. Ct. App. 1995).	BROAD: MICH. COMP. STAT. §§ 37.2201, 37.2301.	MICH. COMP. LAWS §§ 400.5a, 710.23g, 722.124e (2015).			
Michigan							
		Heightened Scrutiny Only: McCready v. Hoffius, 586 N.W.2d 723, 729 (Mich. 1998), vacated on other grounds, 593 N.W. 2d 545 (Mich. 1999); Porth v Roman Catholic Diocese, 532 N.W.2d 195 (Mich. Ct. App. 1995).					
Minnesota							
		Heightened Scrutiny Only: Hill-Murray Federation of Teachers v. Hill- Murray High School, 487 N.W.2d	BROAD: MINN. STAT. ANN. §§ 363A.08 subd. 2, 363.09 (2015). See also 363A.03,	MINN. STAT. ANN. §§ 363A.03 (34) (2015).	MINN. STAT. ANN. §§ 363A.03 363A.26, 517.09, 517.201 (West 2013).	MINN. STAT. ANN. §§ 363A.03 363A.26, 517.09, 517.201 (West 2013).	

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State	State Review of Neutral Laws (Col. 1)	LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Stand- Alone Adoption Protections (Col. 7)
Mississippi	857 (Minn. 1992); State <i>v. Hershberger</i> , 462 N.W.2d 393, 396–99 (Minn. 1990).	RFRA & Heightened Scrutiny:	MISS. CODE. ANN. § 11-61-1 (West 2015); <i>In re Brown</i> , 478 So. 2d 1033 (Miss. 1985).			BROAD: MO. REV. STAT. § 213.010.1, 213.065.1	
Missouri	RFRA Only: MO. REV. STAT. § 1.302, et seq. (2015).						
Montana	Heightened Scrutiny Only:					BROAD: MONT. CODE ANN.	

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Davis v. The Church of Jesus Christ of Latter-day Saints, 852 P.2d 640 (Mont. 1993); St. John's Lutheran Church v. State Comp. Ins. Fund, 830 P.2d 1271, 1276–77 (Mont. 1992).	BROAD: NEB. REV. STAT.	NEV. REV. NARROW: NEV. REV. STAT. §§ 48–1102, 48–1103, 48–1108; NEB. REV.	NEV. REV. STAT. § 651.050(3) (2015).
Nebraska	No RFRA or Heightened Scrutiny:	In re Interest of Anaya, 758 N.W.2d 10, 19 (Neb. 2008).	STAT. §§ 20–133; 20–137.
Nevada	No RFRA or Heightened Scrutiny	NEV. REV. STAT. § 118.100, 613.340 (2015). <i>See also</i> Assemb. 31, 1999 Sess., 70th Leg. (Nev. 1999); Assemb. 21, 2011 Sess., 76th Leg. (Nev. 2011).	NEV. REV. NARROW: NEV. REV. STAT. §§ 613.310, 613.320, 613.350, 651.050.

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New Hampshire	No RFRA or Heightened Scrutiny: Appeal of Trotzer, 719 A.2d 584, 589 (N.H. 1998).	N.H. REV. STAT. § 354-A:6 (2018). <i>See also</i> An Act Amending the Law Against Discrimination to Prohibit Discrimination on Account of a Person's Sexual Orientation, ch. 108, 1997 N.H. Laws 88, 92 (codified as N.H. REV. STAT. § 354-A:10 (2018)) ; <i>See also</i> An act prohibiting discrimination based on gender identity, H.B. 1319 (N.H. 2018).	N.H. REV. STAT. § 354-A:16-17 §§ 354-A:2, 354-A:18.	N.H. REV. STAT. § 354-A:16-17 (XIV) (2018); <i>See also</i> An act prohibiting discrimination based on gender identity, H.B. 1319 (N.H. 2018).	N.H. REV. STAT. § 457:37 (III) (2013).	N.H. REV.	

New Jersey	No RFRA or Heightened Scrutiny	N.J. Stat. §§ 10:5–4, 10:5–9.1 (2015).	INTERMEDIATE: N.J. STAT. §§ 10:5–5(l) (2015).
New Mexico	RFRA Only: N.M. STAT. ANN. § 28–22–1, et seq. (2015).	N.M. STAT. ANN. § 28–1–7 (2015). <i>See also</i> An Act Relating to Human Rights, S. 28, 46th Leg., 1st Sess. (N.M. 2003).	BROAD: N.M. STAT. ANN. § 28–1–2(H) (2015).
New York	Heightened Scrutiny Only: Catholic Charities v. Serio, 859 N.E.2d 459, 465–68 (N.Y. 2006).	Only sexual orientation protection: N.Y. EXEC. LAW §§ 290, 296; N.Y. EDUC. LAW (1-a) (McKinney 2016). <i>See also</i> Seccs. 2, 7, §§ 291, 296(2) 2002 N.Y. Laws at 46, 48 (codified as amended at N.Y. EXEC. LAW §§ 291, 296(2) (McKinney 2016)). Courts have interpreted provisions of the Human Rights Laws to cover transgender persons.	NARROW: N.Y. EXEC. LAW, art. 15 §292, N.Y. EDUC. LAW § 292 & 296 (McKinney 2016). Courts have interpreted provisions of the Human Rights Laws to cover transgender persons.
			N.Y. DOM. REL. LAW §§ 10–b(1), 10–b(2) (McKinney 2013).

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North Carolina	people. <i>See also</i> Sexual Orientation Non-Discrimination Act of 2002, ch. 2, § 5, 2002 N.Y. Sess. Laws 48–56 (McKinney 2016).						
North Dakota	Heightened Scrutiny Only:	Matter of Browning, 476 S.E.2d 465 (N.C. Ct. App. 1996).			Matter of Browning, 476 S.E.2d 465 (N.C. Ct. App. 1996).	No RFRA or Heightened Scrutiny	BROAD: N.D. CENT. CODE § 14-02.4-c2, § 14-02.4-c8
							N.D. CENT. CODE § 14-02.4-c2, § 14-02.4-c8

Ohio	Heightened Scrutiny Only:	NARROW: OHIO CODE §§ 4112.01, 4112.02.			
	Humphrey v. Lane, 728 N.E.2d 1039 (Ohio 2000).				
Oklahoma	RFRA Only:	BROAD: OKLA. STAT. ANN. tit. xxv § 251, et seq. (2015).			
	Okla. Stat. tit., 51 § 251, et seq. (2015).				
Oregon	No RFRA or Heightened Scrutiny:	OR. REV. STAT. §§ 659A.403, 659A.421 (2015). <i>See also</i> The Meltebeke v. Bureau of Labor & Indus., 903 P.2d 351, 359–62 (Or. 1995).	BROAD: OR. REV. STAT. § 659A.001, 659A.400, 659A.006. Act of 2007, S. 2, 74th Leg., Reg. Sess. (Or. 2007).	OR. REV. STAT. § 659A.400 (2015).	
	RFRA Only: PA. STAT. tit. 71, § 2403, et seq. (2016).				
Pennsylvania	RFRA Only:	INTERMEDIATE: 43 PA. STAT. §§ 954, 955.			
	PA. STAT. tit. 71, § 2403, et seq. (2016).				
Rhode Island	RFRA Only:	R.I. GEN. LAWS §§ 28-5-7, 34-37- 22, 34-37-22 (2015). <i>See also</i> An Act Relating to Civil Rights, ch. 32, sec. 7, 1995 R.I. Pub. Laws 83	Narrow: R.I. GEN. LAWS §§ 11-24-3 28-5-6.	R.I. GEN. LAWS § 11-24-3 (2015).	R.I. GEN. LAWS ANN. § 15-3-6.1 (West 2013); R.I. GEN. LAWS § 28-5-7 (2015).
	R.I. GEN. LAWS § 42-80-1-1, et seq. (West 2006).				

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State	State Review of Neutral Laws (Col. 1)	LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Adoption Protections Passed Alone Adoption Protections (Col. 7)
South Carolina	RFRA Only: S.C. CODE, ANN. § 1-32-10, et seq. (2015).	codified as R.I. GEN. LAWS Ann. § 11-24-2 (Supp. 2013)); An Act Relating to Civil Rights, H. 5920A, Gen. Assemb. (R.I. 2001).	NARROW: S.C. CODE. ANN. §§ 1-13-30, 1-13-80, 45-9-10.	S.D. CODIFIED LAWS §§ 20-13-1, 20-13-18, 20-13-22.	BROAD: S.D. CODIFIED LAWS § 20-13-1,	S.D. CODIFIED LAWS §§ 26-6-36 – 26-6-41 (2017).	
South Dakota	No RFRA or Heightened Scrutiny	Tennessee	RFRA & Heightened Scrutiny: TENN. CODE ANN. § 4-1-407 (West	BROAD: TENN. CODE ANN. §§ 4-21- 102, 4-21-405.			

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			TEX. HUM. RES. CODE § 45.001 et seq. (2017).
			UTAH CODE §§ 17-20-4; 30-1-6; 34A- 5-102 to -112; 57-21-2 to -7; 57-21-12; 63C- 20-102 to -303 (2015).
		BROAD: UTAH CODE §§ 13-7-2, 34A- 5-102; 57-21-2 to -7; 57-21- 12 (2015).	V.T. STAT. ANN. tit. 9, § 4501(1) (2015).
		No RFRA or Heightened Scrutiny	V.T. STAT. ANN. tit. 21, § 495(a) (2014); V.T. STAT. ANN. tit. 9, § 4503 (2015). See also An Act Relating to Discrimination on
Texas	2015 Utah Laws Ch. 13.	2015 Utah Laws Ch. 13.	V.T. STAT. ANN. tit. 9, § 4501(1) (2015).
Utah	No RFRA or Heightened Scrutiny	BROAD: UTAH CODE §§ 34A-5-102 to -112; 57-21-2 to -7; 57-21- 12 (2015).	V.T. STAT. ANN. tit. 9, § 4501(1) (2015).
Vermont	No RFRA or Heightened Scrutiny	BROAD: V.T. STAT. ANN. tit. 21, § 495d;	V.T. STAT. ANN. tit. 9, §§ 4501, 4502, 5144(b) (2013).

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State	State Review of Neutral Laws (Col. 1)	LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Adoption Protections Passed Alone Together with Other Legislation (Col. 7)	V.A. CODE ANN. § 63-2-1709.3 (2012).
Virginia								RFRA Only: V.A. CODE ANN. § 57-2.02 (2015).

Washington	Heightened Scrutiny Only. City of Woodinville v. Northshore United Church of Christ, 211 P.3d 406, 410 (Wash. 2009); <i>Munn v. Martin</i> , 930 P.2d 388 (Wash. 1997).	WASH. REV. CODE §§ 49.60.180, 49.60.222 (2015). <i>See also</i> An Act Relating to the Jurisdiction of the Washington Human Rights Commission, ch. 4, 2006 Wash. Sess. Laws 12 (codified as WASH. REV. CODE § 49.60.215 (2012)).	BROAD: WASH. REV. CODE § 49.60.040(2) (2015).	WASH. REV. CODE § 49.60.040(2)
West Virginia	Heightened Scrutiny Only: <i>State v. Eberly</i> , 146 S.E.2d 705 (W.Va. 1966)	Scrutiny Only: <i>State v. Eberly</i> , 146 S.E.2d 705 (W.Va. 1966) (applying a standard of review that is unclear, but inconsistent with <i>Employment Division v. Smith</i>).	BROAD: W. VA. CODE § 5-11-3.	W. VA. CODE § 5-11-3.

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State	State Review of Neutral Laws (Col. 1)	LGBT Employment & Housing Protections (Col. 2)	Scope of Public Accommodation Laws (Col. 3)	SOGI Public Accommodation Laws (Col. 4)	Specific (Surgical) Protections for Marriage (Col. 5)	Adoption Protections Passed Together with Other Legislation (Col. 6)	Stand- Alone Adoption Protections (Col. 7)
Wisconsin	Heightened Scrutiny Only:	Only sexual orientation protection: Coulée Catholic Sch. v. Labor & Indus. Review Comm'n, 768 N.W.2d 868, 884-87 (Wis. 2009); State v. Miller, 549 N.W.2d 235 (Wis. 1996).	WIS. STAT. §§ 106.50, 11.36 (2015). <i>See also</i> An Act to Amend 15.04 (1) (G), 16.765 (1) and (2) (a), 21.35, 66.39 (13), 66.395 (2m), 66.40 (2m), 66.405 (2m), 66.43 (2m), 66.431 (3) (E) 2, 66.432 (1) and (2), 66.433 (3) (a) and (C) 1. B and (9), 101.22 (1), (Lm) (B), (2m) and (4n), 101.22(1) (1), 11.31 (1) to (3), 11.32 (5) (a), 11.70 (2), 11.81 (9)	INTERMEDIATE: WIS. STAT. §§ 106.52, 11.32, 11.337.	Only sexual orientation protection: WIS. STAT. § 106.52(1)(e)(1) (2015).		

	Wyoming	No RFRA or Heightened Scrutiny	NARROW: WYO. STAT. ANN. § 6-9-101, 27-9-105.
(B), m.85 (1), 227.033 (1), 230.01 (2), 230.18, 234.29 and 942.04 (1) (a) to (C) and (3); And to Create m.32 (4s) and (5) (1) of the Statutes, Relating to Prohibiting Discrimination Based Upon Sexual Orientation, Assemb. 70, 1981 Assemb. (Wis. 1982).			

