**YESHIVAT HAR ETZION**

**ISRAEL KOSCHITZKY VIRTUAL BEIT MIDRASH (VBM)**

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**Deracheha: Women and Mitzvot**

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IN LOVING MEMORY OF

Jeffrey Paul Friedman z"l

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לע"נ

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Tefilla Be-tzibbur

What is the nature of communal prayer? What is the role of Shaliach tzibbur and who can fill it? What is the significance of women's participation?

# Communal Prayer

What is communal prayer?

An individual recites the *Amida (*also referred to as *Shemoneh Esrei*), the central component of prayer, with or without a [minyan](https://deracheha.org/minyan). However, the silent *Amida* takes on a special communal aspect when recited with a minyan.

Furthermore, the communal prayer services of *Shacharit, Mincha* and *Mussaf* include a repetition of the *Amida* recited aloud by the prayer leader (*shaliach tzibbur*). *Ma'ariv* on Shabbat includes *Magen Avot*, which plays a similar role to the repetition of the *Amida*.

Each recitation serves its own purpose. Following Rav Yosef Dov Soloveitchik, we can call the initial recitation *tefilla* ***be****-tzibbur*, prayer **in** the community, and the repetition *tefillat* ***ha****-tzibbur*, the prayer **of** the community.

**I. Tefilla Be-tzibbur** First, each member of the congregation recitesthe *Amida* silently, at the same time, *tefilla be-tzibbur*. Many halachic authorities view this simultaneous recitation as the core of communal prayer, for here is when we turn to God as part of a group seeking *rachamei*, Divine mercy:

*Chayyei Adam* I:19

The essence of *tefilla be-tzibbur* [prayer in the community] is *Shemoneh Esrei*, which is that ten adult men pray together, and not as the masses think that the essence of praying with ten is just to hear *Kaddish*, *Kedusha*, and *Barechu*…

**II. Tefillat Ha-tzibbur** Second, when the congregation completes their silent recitation of the *Amida,* the *shaliach tzibbur* recites *the Amida* out loud, *tefillat ha-tzibbur*.

Some authorities, including Rambam, seem to view this repetition of the *Amida* as the centerpiece of communal prayer. Rambam's discussion of communal prayer highlights *tefillat ha-tzibbur*, not the initial silent prayer.

Rambam *Tefilla* 8:4

How is *tefillat ha-tzibbur* [conducted]? One person prays out loud and everyone listens. This cannot be done with fewer than ten adult free men. And the *shaliach tzibbur* is one of them.

What is the relationship between the congregation’s recitation of the *Amida* and the *shaliach tzibbur*'s repetition? A mishna records a debate:

Mishna *Rosh Ha-shana* 4:9

Just as a *shaliach tzibbur* [prayer leader] is obligated [to recite the *Amida*], each and every individual is obligated. Rabban Gamliel says: The *shaliach tzibbur* discharges the obligation for the masses.

The first opinion in the mishna asserts that every person in the congregation must recite the *Amida* individually. In contrast, Rabban Gamliel maintains that the *shaliach tzibbur*’s repetition discharges the congregants’ prayer obligation.

The Talmud adds more layers to the discussion and concludes that everyone who is able to should recite the *Amida* themselves. The *shaliach tzibbur* usually only discharges the prayer obligation of the unlearned. This function is still enough to render the repetition a form of communal prayer. On the High Holidays, however, when prayer is longer and less familiar and thus more difficult to master, the *shaliach tzibbur* can discharge everyone's obligation.

*Rosh Ha-shana* 34b

Rabban Gamliel said to them: According to your words, why does the *shaliach tzibbur* lead prayers [lit., go down before the *aron*]? They said to him: In order to discharge the obligation of a person who is inexpert [in reciting the *Amida*]…Rabbi Yochanan said: The halacha is like Rabban Gamliel regarding the *berachot* of Rosh Ha-shana and Yom Kippur.

At first glance, even when limited in application, this halacha might seem to fly in the face of our understanding of prayer as essentially seeking *rachamei*. How can a person act as an agent for someone else's prayers? Unlike other verbal *mitzvot*, such as reciting *Kiddush*, prayer is first and foremost an individual encounter with and plea to God.

Perhaps that is why, unlike the case of other verbal obligations, a person **cannot** freely discharge another's obligation to pray. The halachic mechanism of *shomei'a ke-oneh*, which considers hearing to be tantamount to speech, does not operate for *tefilla*.[[1]](#footnote-1)

The only halachic scenario that allows for one person to discharge another's prayer obligation is the one the Talmud describes, when the *shaliach tzibbur* of a minyan discharges the obligation of someone who would otherwise not be able to pray. This applies to the unlearned year-round, and to the masses on Rosh Ha-shana and Yom Kippur.

*Shulchan Aruch* OC 124:1

After they [the *tzibbur*] have finished their prayer, the *shaliach tzibbur* repeats the prayer, so that if there is someone who does not know how to pray, he can have intention to what he [the *shaliach tzibbur*] says and discharge his obligation through it.

This halachic mechanism remains in place even now, since someone who is inexpert may enter a synagogue at any time.[[2]](#footnote-2)

# Shaliach Tzibbur

The fact that **only** the *shaliach tzibbur* can discharge another's prayer obligation suggests that the *shaliach tzibbur*'s recitation of *tefillat ha-tzibbur* is qualitatively different from the *Shemoneh Esrei* of a regular individual.

The Talmud teaches that after the destruction of *Beit Ha-mikdash*, formal prayer took on the role once occupied by sacrifices, *korbanot*. Maharil builds on this idea. He writes that *tefillat ha-tzibbur* is akin to a communal sacrifice, and the *shaliach tzibbur*'s role parallels that of the *Kohen* who performs the sacrificial service on behalf of the whole community.

Responsa Maharil 97

For *tefilla* is *avoda* [a term for worship used for sacrifices]…Also, they [the men of the Great Assembly] connected them [the daily prayers] to the daily sacrifices. Thus you learn that when a *shaliach tzibbur* prays or offers a communal sacrifice, if a few [of the *tzibbur*] don't want his *avoda*, how can they discharge their obligation?

Maharil adds that the *shaliach tzibbur* must be acceptable to the community. This assertion relates to the term “*shaliach tzibbur*,” which literally means “agent of the community.”

Rav Soloveitchik explains that the **full community** is tasked with discharging the prayer obligations of individuals who cannot pray on their own. The *shaliach tzibbur* acts not as an individual, but as the community’s agent:

*Reshimat Shiurim* Gri"d Soloveitchik *Sukka* 38a, p. 187

*Tefillat ha-tzibbur* is not a *tefilla* of ten individuals, but a distinct *tefilla* entity of its own…The *shaliach tzibbur* prays on behalf of the *tzibbur*—and the individual who is inexpert discharges his *tefilla* obligation by virtue of participating *in tefillat ha-tzibbur*. The individual discharges his obligation through the *tzibbur*, but not through the regular principle of *shomei'a ke-oneh* [listening is tantamount to responding] as in other *berachot*. In *shomei'a ke-oneh* throughout the Torah, an individual discharges another individual's obligation. But in *Keri'at Shema* and in *tefilla*, it is the *tzibbur* that discharges the individuals' obligations.

In practice, the *shaliach tzibbur* also leads the community in other rituals attached to the *Amida*, including [*devarim she-bikdusha*](https://deracheha.org/minyan) such as *Kaddish* and *Barechu*. The more general term for a prayer leader, *chazzan*, can apply both to the *shaliach tzibbur* and to the leader of other parts of the service, such as *Pesukei De-zimra*, where the role is less formalized.

Leading

Why can’t a woman serve as *shaliach tzibbur*? As Maharil suggests, *Tefillat ha-tzibbur* is in some ways analogous to a *korban tzibbur*, a communal sacrifice. A *shaliach tzibbur* repeating the *Amida* thus functions as an agent through whom the community discharges obligations in prayer, akin to the *Kohen* performing the sacrificial service.

Even though the communal sacrifices in *Beit Ha-mikdash* [belonged to the entire community](https://deracheha.org/mussaf), only a *Kohen* could offer them on behalf of the people. Perhaps this provides precedent for the idea that not all participants in a communal ritual are eligible for the role of communal agent.[[3]](#footnote-3)

Indeed, as Rambam states (above), only someone who can be counted in a minyan can serve as a communal agent for it. Although a woman is obligated in prayer (and, as we will see, participates fully in *tefilla be-tzibbur*), she is not counted towards a [minyan](https://deracheha.org/minyan) for *tefillat ha-tzibbur*. Women's exemption from minyan itself might originate in a halachic tendency to select men as communal representatives. (See more [here](https://deracheha.org/minyan).)

**Devarim she-bikdusha** Women's not counting toward minyan means that women cannot serve as agents of the community leading *tefillat ha-tzibbur*. Does that logic also apply to other *devarim she-bikdusha*?

Some authorities maintain that it does. Especially given that a woman does not count toward forming a minyan for reciting *devarim she-bikdusha*, they assume that women cannot lead any *davar she-bikdusha*. Meiri states this directly:

Meiri, Berachot 47b

A *davar she-bikdusha* is not entrusted to women

*However, devarim she-bikdusha* are sometimes recited outside of the context of *tefilla be-tzibbur* or do not entail agency on behalf of the community. They may simply be calls to praise and sanctify God, in the presence of a minyan. In those cases, when no agency or *tefilla be-tzibbur* is involved, some authorities maintain that *devarim she-bikdusha* should follow the logic of the general mitzva of *kiddush Hashem*, which includes women. Rav Yair Bacharach makes this point regarding mourner's *kaddish*, which is a *davar she-bikdusha*, but is not part of leading the prayer service.[[4]](#footnote-4)

Responsa *Chavot Yair* 222

A woman is commanded in *kiddush Hashem*

Both *Barechu* and *Shema* have the same *shaliach tzibbur* as *Shemoneh Esrei*, in part because the need to connect *ge'ula li-tfilla* dictates that there be no break between them.[[5]](#footnote-5) The *shaliach tzibbur* also recites the regular *Kaddish* (as opposed to mourner's *Kaddish*), which serves as a lead in to the whole prayer unit,[[6]](#footnote-6) as well as *Kedusha,* which is embeddedwithin the repetition of the *Amida.* This list covers nearly all of communal *tefilla*, and effectively rules out a woman leading *devarim she-bikdusha* in the prayer service.

Recent Discussion

In recent years, as many women have shown increasing interest in participating in communal forms of *avodat Hashem*, some communities have begun to have women serve as *chazzanit* and lead rituals or portions of *tefilla* that do not include discharging obligations or leading *devarim* *she*-*bikdusha* (again, with the possible exception of mourner's *Kaddish*) and thus do not technically require a formal *shaliach tzibbur*. These might include the prayer for the State of Israel, *Kiddush* in synagogue Friday night, *Kabbalat Shabbat,* or even *Pesukei De-zimra*.

Ironically, support for women leading synagogue ritual often comes through technical halachic argumentation that leading a given ritual bears little or no halachic import, such that a male minor could lead it.[[7]](#footnote-7)

These measures have been met with controversy. (We'll discuss the question of women participating in communal Torah readings in a future piece.) Potential halachic questions include the following:

**I. Confusion** A woman leading some synagogue rituals might sow confusion, creating the impression that a woman may serve as *shaliach tzibbur*.[[8]](#footnote-8) (We saw a similar argument raised in discussion of women blowing [shofar in Elul](https://deracheha.org/shofar-in-elul).) The practice of many synagogues, however, to permit minor males to lead *Kabbalat Shabbat* or *Pesukei De-zimra* without concern for such confusion weakens this objection.[[9]](#footnote-9)

**II. Tzeniut** Sometimes questions might arise, depending on the set up, of eroding [gender separation in synagogue](https://deracheha.org/mechitza-1-purpose). When the recitation involves chanting or singing, it arguably raises issues of [*kol isha*](https://deracheha.org/kol-isha-1-halachic-basis) as well. Even when *kol isha* is not technically at issue, many halachic authorities call for an extra measure of *tzeniut* in the synagogue, which women's leading ritual might challenge. This might relate to the halachic debate around women [discharging men's public obligations](https://deracheha.org/discharging-obligations-in-practice) or leading men's ritual recitations in general. On the other hand, some *tzeniut* considerations vary based on context and community norms.

**III. Synagogue Practice** Changes in ritual practice are not undertaken lightly, especially in the synagogue, the "*Mikdash me'at*" "Temple writ small" (as we saw in our discussion of "[Dancing with a Sefer Torah](https://deracheha.org/dancing-with-torah)"). While new customs such as *Kabbalat Shabbat* (only about four hundred years old) are sometimes adopted, these processes are typically slow and cautious, because there is halachic and religious value to retaining continuity with prior generations and to keeping in step with other communities worldwide.

To date, Rav Professor Daniel Sperber is the most prominent rabbinic voice in support of these innovations.[[10]](#footnote-10) They have garnered opposition or lack of support from many halachic authorities. Opponents have raised concerns about divisiveness or about where they might lead.

Rav Hershel Schachter, who opposes these practices on halachic grounds, also writes forcefully that more than technical halachic questions are at stake.[[11]](#footnote-11)

Rav Hershel Schachter, “On the matter of Partnership Minyanim,” Shevat 5774

In the opinion of the innovators, they are doing everything “according to Halacha,” as they explain at length in their articles…… Even if the motivation in a particular case is not unacceptable, still, the actual content of this practices is not correct, for one who wishes to know whether a woman is permitted to serve as *shaliach tzibbur* for *Kabbalat Shabbat*, and looks in *Shulchan Aruch Orach Chayyim*, Laws of *Kabbalat Shabbat*, and didn’t find anything, and decides based on this that there is no “halachic” impediment, is in error, for with every question one must look and discuss from all sides and from all perspectives… In practice, we have not heard that a single one of the recognized great rabbis of the generation has agreed with them, to establish that they are in accordance with the spirit of Torah… And the content of the practice contradicts the quality of *tzeniut* required of women, and it is prohibited for us to enact new practices in a manner that cast aspersions on the earlier generations – to show that, as it were, “our rabbis acted unfairly in discriminating against women,” and as is known from history, the innovation of such practices (without the agreement of the great rabbis of the generation) is liable to lead to sin and to Reform, God save us…… And throughout the generations, we have never heard nor seen such a thing practiced among the communities of Israel, and there was presumably good reason for this… and the matter of tradition and custom is an extremely important point, in observing the *mitzvot* and in determining the halacha…

Rav Sperber, on the other hand, claims that opposition to these practices is based primarily on policy considerations, rather than serious halachic objections:[[12]](#footnote-12)

Rav Professor Daniel Sperber, "The Kabbalat Shabbat Memorandum," The Seforim Blog, June 2013

…[R]ather than this being a genuinely halachic debate, it is more a socio-political polemic, built on shaky grounds and dressed in the somewhat misleading garb of halachic disquisition.

In a blog piece, Dr. Yoel Finkelman notes that the dispute centers more on broad questions of halachic process and authority than on technical halachic argumentation.[[13]](#footnote-13)

Dr. Yoel Finkelman, “Parsing the Partnership Minyan Debate,” moderntoraleadership blog, 5 November, 2014

Much of the debate about partnership minyanim transcends the technical questions of whether a particular synagogue practice can be defended in the sources, but instead revolves around questions of who gets to make those determinations and what gives them that authority. Hence, arguments (from both of the left and the right) about their positions often become circular. One side claims: My practice is “legitimate” because I can defend it technically in the sources, and that is all I need. The other side responds: No, your practice is “illegitimate” because it is not backed by authorities with the shoulders broad enough to make such determinations, or it is incompatible with the spirit of the law, a determination that only those on my side are qualified to make.

Beyond technical halachic argumentation, the essential questions here are:

* Do the principle of *tzeniut* and the force of tradition leave room for change in women's roles in the synagogue?
* Are such changes are justified or desirable, and to what extent?
* Who has the authority to make these decisions?

Should we try to maximize women's leadership opportunities in the synagogue?

As opportunities and responsibilities for women and men – professionally, in the community, and in the family – continue to converge, the disparity between a woman's roles outside the synagogue and within it may grow.

Divergence of the synagogue from the everyday can be a positive hallmark of holiness. Many people are happy with the status quo and would not wish to see it change, including many religious women who love to attend synagogue exactly the way it is, or who prefer to pray at home.

Some religious women and men, though, find the difference between women's religious and secular roles discomfiting, and would appreciate enhanced opportunities for women's communal avodat Hashem, particularly in the synagogue.

At the same time, many religious leaders and laity view any women's ritual leadership in the synagogue as clearly beyond the pale. The opposition to such innovation holds even when devarim she-bikdusha (with the possible exception of mourner's Kaddish) or formal service as shaliach tzibbur are off the table. Rav Hershel Schachter, for example, has argued that changes of this sort would violate classic conceptions of tzeniut as well as cast aspersions on our ancestors.

Concerns about change are not taken lightly. Many communities have rejected synagogue innovations wholesale, sometimes while embracing other frameworks such as women's tehillim or tefilla groups.

Some communities have instituted a select few changes, such as having women make announcements or reciting the prayer for the State of Israel (which arguably has not been fully absorbed into a shaliach tzibbur's role), in a limited fashion.

A few communities, often known as partnership minyanim, have adopted new practices quickly and widely, arguing that many concerns about innovation are not technically prohibitions of Halacha, and that the specific needs of their communities are not fully understood by the vast majority of halachic authorities.

Indeed, it is important to distinguish between Halacha and public policy. Still, public policy can be a halachic consideration, and Halacha is more than a string of technicalities.

These developments present a number of questions, without easy answers:

* How do we address women who feel alienated, unwelcomed, uninspired or even dishonored in synagogue? Or those women who seek a speaking or lead role in ritual within a halachic framework— who also may find their motivations questioned or judged?
* Is there a way to respond to these voices while maintaining adherence to Halacha and reverence for tradition? Or should respect for tradition lead us to call any calls for change into question?
* Should we seek new roles for women in synagogue to whatever extent Halacha might technically allow? Or should we foster other opportunities for communal avodat Hashem?

Even without resolving these questions, we might reach consensus on a few points:

* If there is to be change in the synagogue, it must be undertaken with utmost care and the highest level of halachic guidance.
* If there is to be no change in the synagogue, then other channels for communal avodat Hashem, complementary to the synagogue, should be developed for women who seek them.
* The way forward depends on genuine dialogue between laypeople and halachic authorities, taking into account the diversity of needs within modern communities, the preeminence of Halacha, and the weight of tradition.

# Participating

Women don’t count toward creating a *minyan* for *tefillat ha-tzibbur.* Does that imply that women are **not** considered part of the *tzibbur*? No. A woman praying with the *tzibbur* is only precluded from being *shali'ach tzibbur*. In every other respect, she is a **full participant** in *tefilla be-tzibbur*.

*Reshimat Shiiurim* Gri"d Soloveitchik *Sukka* 38a, p. 183

The halacha of women in these matters is that they are not able to establish the *minyan* which makes [communal] *tefilla* obligatory and fitting…Or to be *shaliach tzibbur* to discharge the obligation of the masses in *tefilla*...even so, when there is a minyan of men, a woman also joins them as part of the entity of the *tzibbur* that prays, and the *shaliach tzibbur* discharges her obligation…

Similarly, a man need not be counted toward a *minyan* to be part of *tefillat ha-tzibbur*. A man who joins a minyan from a nearby location is still considered to be a full participant in public prayer and can answer *devarim she-bikdusha*:

*Shulchan Aruch* OC 55:20

If there were ten in one place saying *Kaddish* and *Kedusha*, even someone who is not [in that place] with them can respond to them.

This holds true for men praying in [a women's section](https://deracheha.org/mechitza-2-structure) as well,[[14]](#footnote-14) so praying in the women's section should likewise not detract from women's joining in *tefillat ha-tzibbur*.

A couple of early sources also indicate that women's participation in public prayer is considered meritorious. Midrash *Yalkut Shimoni* gives one example:

*Yalkut Shim'oni Eikev* 846

A story of a woman who became very old and came before Rabbi Yosei ben Chalafta. She said to him: Rabbi, I have become too old….And I seek to exit the world. He said to her: What mitzva do you have the habit of doing every day? She said to him: I have the habit, where even if I have something cherished, I leave it and rise early for synagogue every day. He said to her: Keep yourself from synagogue for three consecutive days. She went and did that, and on the third day she became sick and died

The merit for this woman's scrupulous attendance at prayers was enough to prolong her life.[[15]](#footnote-15) In practice, while many Jewish women try to attend synagogue on Shabbat and *chagim*, the vast majority do not take part in communal prayer on a daily basis. Although texts such as Yalkut Shimoni praise prayer attendance as meritorious, other forms of *avodat Hashem*, such as *chessed* or child-rearing, often receive more rabbinic and social support.[[16]](#footnote-16)

Rav Eliyahu Kalischer, a student of Rav Chayyim Volozhin, takes the idea of women's participation a step further. There is extensive halachic discussion regarding whether the silent *tefilla be-tzibbur* requires at least ten men to be present who have not yet prayed. Rav Kalischer maintains that when there is a minyan of men present, but some have already prayed, women joining in the *tefilla be-tzibbur* can count toward forming a group of ten who have not yet prayed.[[17]](#footnote-17)

In practice, a person who arrives late to synagogue, or who prays more slowly than the congregation, would often need to skip some of *Pesukei De-zimra* in order to catch up with the *tzibbur* in time for the *Amida*. What should a woman do in such a situation? Is it any different from what a man would do?

Custom varies from community to community. Rav Shlomo Zalman Auerbach has been quoted to the effect that a woman coming late to synagogue should not adjust her prayer in order to catch up with the congregation.[[18]](#footnote-18) In oral communication, Rav Yehuda Henkin left this choice up to the woman.

In contrast, Rav Baruch Gigi, Rosh Yeshiva of Yeshivat Har Etzion, instructs a woman coming late to synagogue to adapt her prayer much as a man would in order to join the congregation. In other words, she should abbreviate her *Pesukei De-zimra* in order to recite *Shemoneh Esrei* with the *tzibbur*.[[19]](#footnote-19) If she missed *Shacharit*, she should recite it silently when the community recites *Mussaf* (since a woman is certainly obligated in *Shacharit,* while her obligation in [*Mussaf*](https://deracheha.org/mussaf) is a question). She would then have the opportunity to recite *Mussaf* along with the *shaliach tzibbur*.[[20]](#footnote-20) (We will discuss women and *keri'at Ha-Torah*, and its implications for a woman late to synagogue, in a forthcoming piece.)

What does it mean for a woman to participate in tefilla be-tzibbur?

In a searing piece on her year of reciting Kaddish, Miriam Schacter writes of the tensions inherent in a woman's praying with a minyan.[[21]](#footnote-21)

Miriam Shacter, "I Matter but I Don't Count," Times of Israel, 9 December, 2019

I was so appreciative of the men who came to shul at 6:20 and 6:30 every weekday morning…I was reliant on them, but I could do nothing to help out…That my presence was recognized and had value, but that I didn’t possess the same halachic status as the men — I didn’t count — felt to me like contradictory realities. Choosing to daven in a space where I mattered but didn’t count shaped my daily shul experience. Identifying with conflicting principles is a reality for many of us in a variety of areas in our lives…Knowing that I was **choosing** to remain conflicted, deciding that I want to live and pray with a community that shares my personal halachic adherence to a variety of halachic norms and behaviors, while not being counted, made the experience tolerable….I want to impress on my community that when women are present, it is imperative that the women know they matter.

A woman who participates in daily tefilla be-tzibbur does more than answer to devarim she-bikdusha. She includes herself in day-to-day **communal** avodat Hashem. For many women, this is a new area of avodat Hashem, since traditional women’s worship has predominantly been more private (with some individual exceptions).

Schachter's piece hones in on how important it can be for a community to convey to a woman who chooses to join tefilla be-tzibbur that her presence matters, that halachically she is a part of the prayer community, even if she is not formally counted. It is likewise important for the men of the minyan to recognize that her tefilla joins with theirs.

These issues became particularly pronounced during the Covid-19 pandemic, where some communities were quick to close off synagogues to women in order to maximize male attendees. Others made a conscious decision to include women in services as much as possible.

How can congregations recognize the significance of women’s participation when women do not count for minyan or pray in the same space as men?

In an effort to address this question, some minyanim have resolved to hold off the beginning of tefilla (or at least devarim she-bikdusha) until both ten men and ten women are present. In this way, the community may experience women's presence as essential, even though Halacha does not maintain that it is. However, this type of practice is untenable in many communities, and can put a significant burden on a congregation. (Perhaps for this reason, few of these minyanim meet every week.) Additionally, it may create a pressure for women to attend synagogue, which can be limiting for women in its own way.

There are other possible steps, though, that could potentially make a significant difference at tefilla be-tzibbur:

* Ensuring that there is a women's section, accessible to those with disabilities (and with a nearby restroom), and that it is set up, lit, clean, stocked with prayerbooks, open, heated or air-conditioned, and available to women for every tefilla, for the full duration of tefilla.
* Keeping the women’s section a women's-only space throughout tefilla.
* Men avoiding having conversations near the mechitza.
* Maximizing a woman's opportunity to see the Torah and to be close to it, in a way that fits the community—and its shul architecture.
* Acknowledging women who attend minyan before or after services, as appropriate.
* Involving women in logistical decisions and communicating changes in timing or location of services to all attendees in advance.
* Announcing the special occasion for which a man has received an aliya before the aliya, so that all in attendance can partake in the simcha.
* Facilitating communication so that, for example, a name of a sick person to daven for can be included in the congregation's prayers or space can be made for birkat ha-gomel.
* Having the shali'ach tzibbur make sure that his voice is audible in the women's section. The same goes for ba'al korei, divrei Torah, or announcements.
* Building awareness of the synagogue's policy on women reciting mourner's Kaddish, and helping make women feel comfortable following it.

All of these measures merit consideration. Practical implementation of any of them would depend on the nature of each community, its sensitivities and the resources at its disposal.

# Obligation

The meritorious nature of women's participation in communal prayer does not make it obligatory. It is by no means clear that men are obligated in it, either. Maharil presents public prayer as a type of *hiddur mitzva*, or glorification of the mitzva of *tefilla*, not an outright obligation.

Maharil *Minhagim,* Laws of *Eiruvei Chatzerot*

To pray in a quorum of ten is not so much of a mitzva, as a person is able to pray with intention at home, for we do not find that the sages required a person to pray with ten.

A community has a collective obligation to ensure there is a *minyan*, so that *tefillat ha-tzibbur* takes place in each and every community of Jews. An individual should make every effort to attend minyan if there is one within a reasonable distance.[[22]](#footnote-22) But on this view, once a minyan is assured, the individual may not be obligated to attend.

Tur, on the other hand, suggests that individuals do have an obligation to attend communal prayer:

*Tur* OC 90

A person should only pray in synagogue with the *tzibbur*…

What about women? Rav Yaakov Reischer maintains that women have no obligation in public prayer

Responsa *Shevut Ya'akov* III:54

For the woman is not commanded at all to pray with ten...

This statement is only meaningful if one maintains that men do have an obligation in public prayer. Otherwise, once a community has a minyan, it is not clear that men have any more obligation to be present than women do.

Still, Rav Reischer's view aligns with centuries of practice.[[23]](#footnote-23) In fact, in medieval Ashkenaz, many synagogues did not have women's sections at all, but rather set aside independent buildings in which women would pray in unison. Others had women's sections so cut off from the main sanctuary that one who prayed in them, of any gender, was unlikely to count as a participant in communal prayer. In these women's synagogues or sections, a female prayer-leader would independently lead the other women in prayer, not including *devarim she-bikdusha*.[[24]](#footnote-24)

Rav Eliezer Roke'ach's dirge over his wife, Dulcea, describes her as a prayer leader for the women in her community and in other lands, for whom prayer was a central part of *avodat Hashem*.[[25]](#footnote-25)

Eliezer Roke'ach, Dirge, quoted in Avraham Grossman, *Chassidot U-moredot* (Jerusalem: Merkaz Zalman Shazar, 2003), 313. Translation for Deracheha, Shoshana Cohen

Speaker of supplication, breathed into the air/ A thumping heartbeat of confession on all days/ To the soul of all life, and all believers' ways./ Declaiming preparation of fragrant incense/ Proclaiming ten commandments in a voice intense./ She taught women lovingly across all lands/ And made ancient songs sweet with loving hands./ Arrangement of prayers - morn and eve - she arrayed./ To the synagogue she came early, and late she stayed

Since women are not obligated in *tefilla be-tzibbur*, but stand to benefit from it, a woman can make her own choices as to whether she comes to synagogue on time or attends at all (with the possible exception of special occasions where attendance at synagogue facilitates fulfilling another mitzva, like hearing [*parashat Zachor*](https://deracheha.org/arba-parashiyot)).

One possible factor in a woman's decision to attend synagogue or pray at home is *kavvana*, or intentionality in prayer. Some people pray more effectively with the *tzibbur*. For others, praying alone is more satisfying and effective. The Talmud tells us that Rabbi Akiva sometimes prayed with the *tzibbur*, and sometimes alone, and his prayer alone had a special quality.

*Berachot* 31a

It was taught in a Baraita, Rabbi Yehuda said: Thus was the practice of Rabbi Akiva. When he would pray with the *tzibbur*, he would shorten his prayer and go up [quickly] out of concern for burdening the *tzibbur*. But when he would pray on his own, a person would leave him in one corner and find him in another corner. So much [movement] why? Because of his bowing and prostrating.

Normative halacha for men is to prioritize communal prayer over praying with more intentionality. The calculus for a woman may differ.[[26]](#footnote-26) Even so, whenever a woman does participate in *tefilla be-tzibbur*, she avails herself of an opportunity with great spiritual and halachic value.

# Women Praying Together

What of women worshiping together as a group? Assuming that such a group does not perform any ritual that needs a minyan, it does not run afoul of the requirement for minyan.

As noted above, women's prayer distinct from the male *tzibbur* has a long history, going back at least to the women's synagogues of medieval Europe, and continuing today. Students in all-girls schools begin the day with *tefilla*, which often includes communal singing and a female prayer leader. Communities of women and girls gather to recite *Tehillim* – sometimes silently, sometimes responsively with a woman leading.

Is there positive value to praying in a group, even if it is not a minyan? Yes, group prayer is religiously significant, even without all the attributes of *tefilla be-tzibbur*. Rav Moshe Sternbuch suggests that when even three people pray side by side, their prayer has a value beyond that of individual prayer:

*Teshuvot Ve-hanhagot* II:57

When there are even three, there is a positive quality, as it is said "magnify God with me and we will raise up His name together." So, too, God does not despise the prayer of the many, as is explained in *Berachot* (8a). And "the many" is three…It is a positive quality to pray together as three, and when it is impossible to pray in a minyan, and there are three or more together, God accepts the *tefilla* more than when alone, even though it is not as preferred as a *tzibbur*.

A group that is not a minyan generally prays in the same way an individual would. One exception is *Hallel*, where a group of three or more can recite some sections responsively. As we pointed out in our article on [*Hallel*](https://deracheha.org/hallel), a group of women reciting *Hallel* together may form a community for call and response.

Debate

While schoolgirl's *tefilla* and women's *Tehillim* groups are widely accepted, the permissibility and propriety of contemporary women's *tefilla* groups (as they are usually known) have been hotly debated, especially in America, where they have sometimes been perceived as a step toward egalitarianism, a hallmark of more liberal Jewish denominations. (The use of a Sefer Torah in these contexts, which we plan to address in a future piece, has been especially controversial.)

In Israel, representatives of an established women's *tefilla* group share some perceptions of its strengths and complications, providing a window into central aspects of the debate:[[27]](#footnote-27)

Avital Cohen-Brenner, Shelomit Eitam, Miriam Adler, and Tanya Regev, “A Sacred Women’s Space,” *Makor Rishon*, 25.1.2013

…A community of women has coalesced around the prayer [group], who learn together on various occasions and think together about continued spiritual development and progress. We could not create change in the existing synagogue space, and we could no longer remain transparent. But in leaving the “traditional” synagogue, we were not willing to give up on sacred space. Of course we deal with not inconsiderable challenges, such as a “raised eyebrow” from a significant portion of the wider community, or maintaining a “prayer routine” without the obligation of minyan. We are still seeking our special path as a community of praying women. The questions constantly arise: Are we interested in imitating precisely the “male” minyan? Are we interested in conserving routine or in seeking places for spiritual renewal? And most important: How do we create – despite the “separate” arrangement – partnership as couples and families around prayer and *avodat Hashem*? We don’t succeed in overcoming every challenge and we haven’t yet found the answer to every question….Still – we have created a meaningful sacred space in which every woman can find her unique path to *avodat Hashem*.

These women have created a communal space for prayer in which members feel recognized and more connected to the service.

In a sense, their choice prioritizes *kavvana* and personal religious experience over the benefits of *tefilla be-tzibbur* with a minyan. Much of the opposition to women's *tefilla* groups has rested on objection to making such a choice. (This is one reason why daily prayer in girls’ schools or women's *Tehillim* groups, which do not typically represent choosing women's *tefilla* over *minyan*, have not met such opposition.) Rav J David Bleich lays out the argument:[[28]](#footnote-28)

Rabbi J David Bleich, *Contemporary Halachic Problems* Vol I, Part III, Chapter 5. ((New York: Ktav, 1987)

…A woman whose spirit fails to move her to participate in communal prayer may pray at home. But a woman willing to invest the time, effort and spiritual energy in search of a higher form of prayer should recognize that the time and effort invested in attending synagogue services will certainly yield no less a return than she will reap from participation in a women's prayer group… The fulfillment of a *mizvah* in an optimal manner, albeit without extraordinary *kavanah*, is to be favored over less optimal fulfillment accompanied by fervent religious experience. …Assuredly, the guaranteed benefits of *tefillah be-zibbur* outweigh those of any possible subjective experience.

To Rav Bleich, a woman's personal rationale for attending a women's *tefilla* group could never be halachically more significant than the benefits of *tefilla be-tzibbur*. Rav Aryeh Frimer and Rav Dov Frimer relate that Rav Soloveitchik was among those who opposed women attending women's *tefilla* groups for this reason. In an article on tefilla groups, they elucidate his objections, though they do not characterize him as prohibiting the groups:[[29]](#footnote-29)

Rav Aryeh A. Frimer and Rav Dov I. Frimer, "Women's Prayer Services: Theory and Practice," *Tradition* 32:2 (Winter 1998), 5-118.

R. Joseph B. Soloveitchik, like R. Feinstein, was of the view that a women's prayer service, if properly structured, could be conducted in accordance with halakha. Nonetheless, the Rav was most hesitant about women's *tefilla* groups as a general practice and felt that they should not be encouraged. Consistently, he would recommend to his students not to hold such services….As a rule, R. Soloveitchik gave great credence to established Jewish custom and tradition, especially in the area of prayer and the synagogue. Consequently, the Rav was quite conservative when it came to changing *minhagim*….Women's prayer groups with Torah reading, *hakafot*, etc. was, for the Rav, a clear deviation from Jewish prayer forms. That alone was sufficient reason for the Rav to withhold his support for the emerging practice….The Rav was deeply disturbed that women who had consciously chosen not to stay and pray at home, but rather to participate in a women's *tefilla* group, were actively and deliberately opting for the inauthentic in place of the authentic…In later years, the Rav grew increasingly distraught with the direction the women's prayer groups were taking and their possible impact on Jewish life… He further articulated his concern as to the confusion women's services might generate in light of the general egalitarian movement within Conservative and Reform Jewry.

Beyond raising the question of choosing not to attend traditional services, Rav Soloveitchik viewed women's *tefilla* groups as an inauthentic deviation from custom. Their association with liberal denominations further influenced his views to the negative.

Based on this report, one can argue that halachic permissibility and desirability of establishing or participating in a women's *tefilla* group may depend on **how** the group functions and the specifics of its context. For this reason, a group of women considering joining or starting a women's *tefilla* group should be in close contact with local halachic authorities to discuss their aspirations and the relevant halachic parameters, and to determine the best course of action.

In practice, most women's *tefilla* groups meet only once a month or on special occasions (or less frequently), and not weekly, so that attending one resembles the practice of some men to pray outside of minyan on occasion out of personal preference. Leaving aside the question of Torah reading at the groups, which we'll discuss separately, their infrequency means that they do not interfere with the women involved participating in *tefilla be-tzibbur* for most *tefillot.* Occasional prayer at a women's *tefilla* group may even foster a stronger sense of connection to *tefilla* in general, which can ultimately enhance the experience of *tefilla be-tzibbur*.

Why don't more women attend tefilla be-tzibbur? And what role do Rabbis and communities play?

Although some women come to synagogue frequently, many show little to no interest in attending, at least not beyond Shabbat and chagim. Of those who do attend regularly, many arrive late.

Why don’t more women come to synagogue?

**I. Tradition** Women of many communities do not traditionally attend services and are not encouraged to do so. In these communities, members may have the impression that women do not benefit from participating in tefilla be-tzibbur. When attendance is not customary in a given community, women who wish to attend might also hesitate because there is no women’s section, because the women’s section will be occupied by men, or because there are not likely to be other women present.

**II. Other responsibilities** Many women do not attend synagogue or arrive late because it conflicts with responsibilities with their own religious value, such as care-giving or child-rearing, in which women often take the lead. Regular synagogue attendance is more common among women who are not raising young children. College students, for example, find that minyan provides a religious structure and meeting point for peers involved and invested in religious life on campus.

Older women sometimes make going to shul a regular part of the day around retirement age, when they have fewer professional responsibilities, or (for those with children) upon becoming empty-nesters.

**III. Kavvana** Women may find private prayer more conducive to kavvana than tefilla be-tzibbur. Free of obligation in tefilla be-tzibbur, a woman may choose private prayer as a preferred mode of avodat Hashem. Some women experience synagogue as a passive, spectator experience. This can contribute to lack of kavvana in synagogue.

A combination of educational and practical responses can address some of these issues. Women can learn more about the significance of participating in tefilla be-tzibbur as an active prayer experience. Communities can encourage attendance and provide childcare, or an early "hashkama" minyan so that couples with children can split up.

In a piece for Tradition Online, Deracheha Editor-At-Large Sarah Rudolph challenges rabbanim and women to work in tandem to maximize the option for women to attend tefilla be-tzibbur:[[30]](#footnote-30)

Sarah Davis Rudolph, " A “Changing Self-Perception” of One’s Own" Tradition Online

What would happen if…all the shul rabbis announced that women are welcome, and made it so with spacious and pleasant women’s sections, would we attend in droves? If we started attending in droves, would the shuls notice and become more welcoming?...What we need, as communities and as individuals, is to figure out which opportunities are important to us, and why. We need more accessible and honest communication about the halakhic and practical issues surrounding those opportunities. And we need to figure out ways to maintain awareness and availability of those options we believe it is important that women have, even when few women take advantage of them.

# Further Reading

Rav Aryeh A. Frimer and Rav Dov I. Frimer, "Women's Prayer Services: Theory and Practice," *Tradition* 32:2 (Winter 1998), 5-118.

Rav Yosef Dov Solovetichik, *Reshimat Shiurim* *Sukka* 38a

1. We discuss *shomei'a ke-oneh* and discharging verbal obligations here. https;//deracheha.org/discharging-obligations [↑](#footnote-ref-1)
2. *Mishna Berura* 124:12

   They enacted that the *shaliach tzibbur* always repeat the *tefilla*, lest there be one time in the synagogue someone who is inexpert and the *shali'ach tzibbur* discharge his obligation. [↑](#footnote-ref-2)
3. The cases are not fully analogous, because the *Kohen* also plays a role in an individual sacrifice. [↑](#footnote-ref-3)
4. He ultimately opposes a woman saying it in practice for other reasons. We plan to discuss this further in a future piece. [↑](#footnote-ref-4)
5. We discuss *semichat ge'ula li-tfilla* here: https://deracheha.org/birchot-shema [↑](#footnote-ref-5)
6. We plan to address the mourner's Kaddish, which has a different Halacha, in a forthcoming piece. [↑](#footnote-ref-6)
7. This is an animating feature of the Halachic Guide to Partnership Minyanim, which looks for any minority opinion that a ritual does not require minyan or does not entail discharging obligation and, when found, concludes that a woman may lead it. Elitzur A. and Michal Bar-Asher Siegal, "Guide for the 'Halachic Minyan.'" Shvat 5768, [↑](#footnote-ref-7)
8. One reason suggested for why women do not typically lead even other parts of communal services, where the *shaliach tzibbur* has a less formal role, is that it may lead to confusion about the role of the *shaliach tzibbur* when required. Available here: <https://www.torahmusings.com/2010/08/women-leading-kabbalat-shabbat-some-thoughts/>

   Rabbi Michael Broyde, "Women Leading Kabbalat Shabbat: Some Thoughts"

   Changing the custom so as to allow women to lead *Kabbalat Shabbat* as a *chazan* seems to me to be a practice that badly obfuscates between situations where a proper *shaliach tzibur* is needed and where one is not. [↑](#footnote-ref-8)
9. In contrast, a minor is less commonly accepted as leader for weekday *Ma'ariv*, because the role is more clearly aligned with the formal role of *shaliach tzibbur*. Beit Yosef lists a number of Rabbis who object to a minor leading *Ma'ariv*. He ultimately provides possible justification, and in *Shulchan Aruch* calls it a *limmud zechut*, a justification of existing practice rather than lending it his full-fledged support. For his part, Rema does not accept the practice and rules that communities without it may not adopt it.

   *Beit Yosef* OC 53

   One should wonder at the practice for a minor to lead *tefilla* at the close of Shabbat and to pray *Ma’ariv*. It is possible to say that the Sages were particular only with *Shacharit*, which includes the *beracha* of “*yotzer*,” and the holy *tefilla*, and a *shaliach tzibbur* is also needed to repeat the *tefilla* to fulfill the obligation of the masses. A minor, because he is not obligated, cannot discharge their obligations, as it is taught: “Whoever is not obligated in a matter cannot discharge the obligation of the masses.” I heard that Rav Yosef Abudarham challenged this custom, for the minors to lead *tefilla* at the close of Shabbat, and the great Rav Yitzhak De Leon agreed with him to annul this custom. I found that the Rashba wrote in a responsum in the name of the Ra’avad that the reason it is taught [in a mishna] that a minor is not “*pores al Shema*” and does not lead prayers is because the *berachot* and prayers are rabbinic, and a minor who has reached the age of education [in performing *mitzvot*] is [obligated in *mitzvot*] rabbinically. I might say: let a [person with a] rabbinic obligation discharge [another person’s] rabbinic obligation, but we learn otherwise, that because of *kevod ha-tzibbur* (the honor of the community] we do not do something degrading to the community, that a minor discharges their obligation. Up to here are his [Rashba’s] words. According to this reason, there is room for this practice, to say that the community waives their honor. Even according to Rashi’s explanation, that the reasoning of our mishna is that anyone who is not obligated in a matter cannot discharge the obligation of the masses, one can say the *Ma’ariv* is different because it is optional.

   *Darchei Mosheh* OC 53:3

   We do not have this practice

   *Shulchan Aruch* OC 53:10

   One can justify the practice for places where the practice is for minors to lead *Ma’ariv* at the close of Shabbat. Rema: In places that do not have that practice, a minor should not lead prayer even for *Ma’ariv*. [↑](#footnote-ref-9)
10. He outlines his halachic argumentation in favor of some of them here: <https://seforimblog.com/2013/06/the-kabbalat-shabbat-memorandum-by/> [↑](#footnote-ref-10)
11. Available here: <http://www.rcarabbis.org/pdf/Rabbi_Schachter_new_letter.pdf> [↑](#footnote-ref-11)
12. Supra, fn. 10. [↑](#footnote-ref-12)
13. Available here: <https://moderntoraleadership.wordpress.com/2014/11/05/parsing-the-partnership-minyan-debate/> [↑](#footnote-ref-13)
14. *Aruch Ha-shulchan* OC 55:23

    And in the synagogue, everyone needs to be in the synagogue. And if one [man] stands in the *azara*,which is the entry to the synagogue, or in the room next to the synagogue, even though there is an opening from the room to the synagogue, they do not join [to the ten for minyan]. And it was already explained that all this is for the matter of joining the minyan, but when there is a minyan in one place, those who stand in other places can respond amen to *Kaddish* and *Kedusha* and *Barechu* and if they pray with them they are considered to be praying with the *tzibbur*. [↑](#footnote-ref-14)
15. The Talmud tells us about another woman who meritoriously walked a great distance to synagogue every day, garnering reward:

    דההיא אלמנה דהואי בי כנישתא בשיבבותה כל יומא הות אתיא ומצלה בי מדרשיה דר' יוחנן אמר לה בתי לא בית הכנסת בשיבבותך אמרה ליה רבי ולא שכר פסיעות יש לי

    *Sota* 22a

    This widow who had a synagogue in her neighborhood. Every day, she would come and pray in the *beit midrash* of Rabbi Yochanan. He said to her: My daughter, isn’t there a synagogue in your neighborhood? She said to him: Rebbe, but do I not receive reward for the [extra] steps. [↑](#footnote-ref-15)
16. One oft-cited source in this regard is *Iggeret Ha-Gera*, which voices particular concern about jealousy and gossip among young women in the synagogue:

    *Iggeret Ha-Gera*

    The primary definition of seclusion is that you (m.) should not, Heaven forfend, go outside the door of your house, and even in synagogue you should remain very briefly and leave. It is better to pray at home, because in synagogue it is impossible to avoid jealousy, and hearing idle talk and gossip [*lashon ha-ra*]. And one is punished for this, as they said (*Shabbat* 33a) “even the one who hears and is silent…” And all the more so on Shabbat and Yom Tov, when they gather to talk, it is better that you not pray at all….Also, it is better that your daughter not go to synagogue, because there she will see fine clothing and be jealous and tell at home, and this leads to gossip and other things. [↑](#footnote-ref-16)
17. *Yad Eliyahu Pesakim* 7

    Question: If there is in a synagogue a minor or a minyan of six or seven men who did not pray and three prayed, and thus they can only fulfill the *mitzvot* of *Kaddish* and *Barechu* and *Kedusha*, but this does not count toward *tefilla be-tzibbur* unless ten men pray together [silently]…Is a women's prayer is considered part of the *tzibbur* [for the purpose of the silent *Amida*]? And it seems to me…that we do not count them [towards a minyan] for *Kaddish* and *Kedusha*…but it must be that the prayer of women and bondsmen counts toward [a minyan for the silent] communal prayer.

    Available here: <https://hebrewbooks.org/pdfpager.aspx?req=854&pgnum=12> [↑](#footnote-ref-17)
18. *Hachichot Shelomo, Ha-tefilla Be-tzibbur* p. 61, note 7

    A woman should not skip anything in the order of prayer in order to catch up and pray with the *tzibbur*, because the law of *tefilla be-tzibbur* does not apply to a woman at all. [↑](#footnote-ref-18)
19. *Chayyei Adam* I:19:6

    …and if there is no time at all, he should recite *Baruch She-amar* and *Tehilla Le-David* and he should recite *Nishmat* and *Yishtabach*… [↑](#footnote-ref-19)
20. Chayyei Adam even allows for reciting the *Amida* of *Shacharit* along with the *shaliach tzibbur*'s recitation of *Mussaf*, until after *Kedusha*.

    *Chayyei Adam* I:19:8

    …On Shabbat, for *Mussaf*, if for some reason he needs to pray [silently] with the [repetition of the] *shaliach tzibbur*, he should recite *Na’aritzecha* and the whole order of the *Kedusha* as the *shaliach tzibbur* recites it, and concludes with the *shaliach tzibbur* “*Ha-E-l ha-kadosh*.” And even if the *shaliach tzibbur* is repeating *Mussaf* and he is praying *Shacharit*, he should nevertheless recite the order of *Kedusha* that the *shaliach tzibbur* recites. For the primary element is “*Kadosh Kadosh Kadosh*” and that is always the same. Afterwards, he is permitted to pray by himself…

    For more on the general rules of catching up when arriving late to synagogue, see Rav Yitzchak Fuchs, *Ha-Tefilla Be-Tzibbur* Yerushalayim, 5738. [↑](#footnote-ref-20)
21. Available here: <https://blogs.timesofisrael.com/i-matter-but-i-dont-count-reflections-on-saying-kaddish/> [↑](#footnote-ref-21)
22. *Shulchan Aruch* OC 90:9

    A person should make an effort to pray with the *tzibbur*… [↑](#footnote-ref-22)
23. The texts he goes on to quote to support his point (below) are surprising. One, the idea that a woman would not be in the main Temple courtyard does not necessarily tell us about the synagogue. Two, the Talmud concludes that the maiden to whose prayers they object is one who pretends to pray but really practices sorcery.

    Shevut Ya'akov 3:54

    … As we say "From where would a woman appear in the Temple courtyard?" [*Kiddushin* 52b] and "A maiden who prays a lot…is among those who erode the world" (*Sota* 22a). [↑](#footnote-ref-23)
24. Grossman, *Chassidot U-moredot*, p. 314. [↑](#footnote-ref-24)
25. There is an alternate version with the text:

    וידיה בכל יום לנשמת כל חי וכל מאמינים

    She extended her hands every day in "*nishmat kol chai*” and "*ve-chol ma'aminim*" (two liturgical songs). [↑](#footnote-ref-25)
26. Frimer and Frimer, "Women's Prayer Services: Theory and Practice

    It should also be noted that inasmuch as *tefilla be-tsibbur*is not mandatory for women, it is at best a *hiddur mitsvah*, *i.e.*, a more preferable manner of fulfilling their prayer obligation. But praying with greater concentration, understanding and personal meaning-"*kavvana*"-is also an enhanced and elevated mode of prayer. For those women who find that women's prayer groups enable them to pray with increased *kavvana*, the question then arises: which form of *hiddur mitsvah* takes priority, *tefilla be-tsibbur*or *kavvana*?*...* [↑](#footnote-ref-26)
27. Available here: <https://musaf-shabbat.com/2013/01/25/%d7%9e%d7%a2%d7%91%d7%a8-%d7%9c%d7%9e%d7%97%d7%99%d7%a6%d7%94-%d7%94%d7%a4%d7%a0%d7%99%d7%9e%d7%99%d7%aa-%d7%aa%d7%92%d7%95%d7%91%d7%95%d7%aa/> [↑](#footnote-ref-27)
28. Available here: <https://www.sefaria.org/Contemporary_Halakhic_Problems%2C_Vol_III%2C_Part_I%2C_Chapter_V_Women.14-18?lang=bi&with=all&lang2=en>

    Rav Hershel Schachter lists additional concerns:

    Rav Hershel Schachter, “*Tze’i Lach Be-ikvei Ha-tzon*”

    The practices mentioned above are prohibited for several reasons: 1) The *mitzvot* are not complete…for a mitzva that can be fulfilled completely, it is certainly not correct to degrade it and do it in a manner that doesn’t fulfil it… 2) Misrepresenting Torah….setting up “minyanim,” as it were, on a permanent basis, to demonstrate that, as it were, the halacha is that ten women can join for a *davar she-bikdusha*, this is nothing other than misrepresenting Torah…it is incumbent upon us to continue in the tradition of our fathers and grandfathers in the manner of performing the mitzva…there is also a prohibition to change customs…especially in the matter of synagogue custom, the later authorities were extremely stringent…the women’s liberation movement has already succeeded in influencing some idolators…and this influence has already transferred from the non-Jewish idolators to our Jewish brethren, the Conservatives, to the point that they ruled to count women for a minyan…there is concern here of a special Torah prohibition… [↑](#footnote-ref-28)
29. Available here: <http://www.daat.ac.il/daat/english/tfila/frimmer1.htm> [↑](#footnote-ref-29)
30. Available here: <https://traditiononline.org/a-changing-self-perception-of-ones-own-responses-to-dr-wolowelsky/> [↑](#footnote-ref-30)