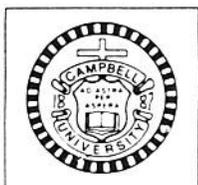


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CAMPBELL

UNIVERSITY 1887-1987

"A Century of Vision and Service"
Celebrating the Past and Anticipating the Future!

OFFICE OF THE PRESIDENT
Dr. Norman Adrian Wiggins
(919) 893-4111

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July 15, 1985

Mr. William H. Thomas
Regional Director
United States Department of Education
Region IV
101 Marietta Tower
Atlanta, Georgia 30323

Dear Mr. Thomas:

I am in receipt of your letters of 25 March 1985, and July 3, 1985, replying to my letter of February 25, 1979, in which you replied to Mister Madison's letter of January 26, 1979. In my letter to Mr. Madison, we set forth information we believed would establish Campbell as a church-related university and "controlled" by the Baptist State Convention of North Carolina to be an "exempt institution" within the meaning of the law. Also, we tried in good faith to identify those areas of our program based upon our religious tenets that we thought were in conflict with the regulations.

It is my understanding that you have conceded that Campbell is a "controlled" institution of Christian Higher Education and further information is not needed at this point. Thus, we will confine our efforts to illustrating possible conflicts between the regulations and our tenets of faith.

At the outset, let me emphasize that Campbell has always been deeply committed to principles of nondiscrimination and equality as required by Federal law. From its beginning, the university was a proponent of equal educational opportunities for women and early opened its doors to minorities. Thus, our conflicts stem out of our Christian beliefs, some of which are set forth in the Baptist Faith and Message Statement, a copy of which is enclosed.

Also, let me apologize for our belated reply to your earlier letter. It came at a time when we were deeply involved in matters of our sponsoring church. Furthermore, your request is of such importance that we wanted to give it careful research and due deliberation. Campbell University is an institution of Christian higher education. Our educational program rests upon our religious commitment. In requesting the present exemptions, we in no way want to compromise our right to claim additional exemptions at a later time. From the outset

of the adoption of Title IX, we have been unable to find a reasonably clear definition of the phrase "religious tenets." If there has been a clarification of that phrase, it has escaped our attention. We need to know if a claim made in good faith as to a particular religious tenet would be acceptable or would that be subject to the determination of the appropriate governmental agency? There are other questions which we would like to address to you or your representative, but we will defer them for now in the hope that more definitive explanations will be forthcoming upon the determination of the proposed legislation now before the Congress.

Now, let me turn to the questions set forth in your letter. We are requested to provide:

2. "A brief description of the religious tenets of the controlling organization that are followed by the institution."

The Baptists of North Carolina are a people

"who profess a living faith. This faith is rooted and grounded in Jesus Christ who is the 'same yesterday, and today, and for ever.' Therefore, the sole authority for faith and practice among Baptists is Jesus Christ whose will is revealed in the Holy Scriptures."

"Baptists emphasize the soul's competency before God, freedom in religion, and the priesthood of the believer. However, this emphasis should not be interpreted to mean that there is an absence of certain definite doctrines that Baptists believe, cherish and with which they have been and are now closely identified."

In addition to the statements quoted from the Report of Committee on Baptist Faith and Message, Baptists fully accept without question the Statements of Jesus Christ when He said:

"I am the resurrection, and the life: he that believeth in me, though he were dead, yet shall he live: and whosoever liveth and believeth in me shall never die..." (John 11:25, 26).

"Because I live, ye shall live also." (John 14:19).

"In my Father's house are many mansions: if it were not so, I would have told you. I go to prepare a place for you." (John 14:2).

Our belief in Eternal Life is matched by our unyielding faith in the Ten Commandments and the Sermon on the Mount and the principles set forth therein. Therefore, we believe in the sanctity of the home, family and the marriage relationship. In stating that we believe the original purpose of Title IX was to follow the Constitution and not allow any agency to question the truth of these

sacred principles or our belief in them, we are not trying to make your task more difficult. As stated earlier, we are committed to the goals of equal opportunity.

You requested that we state those provisions of Title IX from which exemption is requested. Although we might wish, upon further study, to claim additional exemptions, the following are, for now, specifically noted:

1. Sections 106.21 (c), 106.40 and 106.57 (b). Campbell University claims an exemption from these paragraphs of Title IX regulations insofar as they would require us to treat pregnancy, childbirth, or termination of pregnancy of an unmarried woman as a normal illness and a temporary disability. As noted above, Baptists believe the family is ordained of God and that we are required by our faith to inquire into and take action where necessary in regard to marital or parental status or the pregnancy or termination of pregnancy of students and those seeking employment with the institution.

2. Section 106.14. Campbell University does not have the Greek letter fraternities and sororities. It does have social service fraternities, honor societies and associations. Campbell claims exemption from this and all other regulations to the extent that the practices of such groups would interfere with student organizations sponsored by our Baptist Church. For example, such organizations as the Baptist Student Union and the Baptist Young Women's Association and similar organizations should, in our opinion, be clearly exempt from the regulations inasmuch as the membership of some may be limited to one sex only.

3. Section 106.31. Campbell's claim to exemption rests upon its belief that the Church should be free to adopt rules of dress which may differ for men and women. There are differences between the sexes, and it is believed that these are and should be expressed in their dress and grooming habits.

4. Section 106.32. Campbell University has uniformly followed a policy of sex-segregated housing for all of its unmarried students both in on-campus and off-campus housing. The present problems of abortion and divorce, should, standing alone, be sufficient evidence of the need for sex segregated housing for unmarried students. Our rules, however, are based upon the belief of our Baptist church that marriage and the family are sacred and can only be protected when we follow the teachings regarding sexual morality.

5. Section 106.36. Campbell requests an exemption from this regulation inasmuch as the Church of which it is a part believes that the needs of men and women are sufficiently different as to require substantially different kinds of counseling as it relates to career planning, marriage and the building of homes. It is generally believed that mothers play a central role in rearing children and stabilizing the home. Thus, freedom to consider the God-given roles of mothers and fathers must be preserved if we are to make the will of Christ supreme in the family and in the Church.

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In closing, let me once again express our intention to insure that equal educational opportunities are provided to all students. We believe our rules and regulations are based upon the teachings of our Church and sound Biblical principles. If there should be any questions, however, we hope you will let us know.

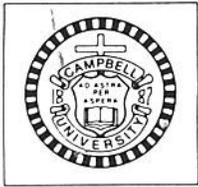
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Sincerely,


Norman Adrian Wiggins
President

NAW:kaj

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