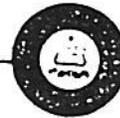


# Columbia Union College



SI

OFFICE OF THE PRESIDENT

TAKOMA PARK, MARYLAND 20012  
AREA CODE 301, TELEPHONE 270-9200

April 28, 1980

Mr. Waite H. Madison, Jr., Acting Director  
Division of Postsecondary Education  
Office of Compliance and Enforcement  
Office for Civil Rights  
Department of Health, Education and Welfare  
Washington, D.C. 20201

Dear Mr. Madison:

Dr. Standish the previous President of Columbia Union College has moved on to another office in another state, and I'm answering the letter of a year ago with regard to information on Title IX for Columbia Union College. We have had a comedy of errors take place here in which I drafted a letter to you March 29, 1979, and never sent it, and then when we finally got a letter ready, we sent it to the wrong office. I have learned recently that you have never been in receipt of it and I send my deepest apologies and I hope that the following information will be helpful to you in assessing our compliance. As far as I can tell, the material which I am writing to you in this letter gives a fairly complete picture of the operation of this college. We have not varied the operation in years, and I think that given the projection for the future, the same will hold. We have appreciated the help from your office, and if you have any questions or comments, we would be appreciative of receiving them.

Columbia Union College has requested that it be granted an exemption, as provided for in 45 CFR 86.11, from certain provisions of Title IX regulations because they conflict with the religious teachings of the Seventh-day Adventist Church, of which Columbia Union College is an integral part. Specifically, Columbia Union College requests exemptions from the following regulations on the following grounds:

45 CFR 86.21, 86.40, and 86.57, which pertain to marital and parental status: The eighth Fundamental Belief of the Seventh-day Adventist Church states "that the law of the ten commandments points out sin" (Church Manual 33). The seventh commandment, Exodus 20:14, states, "Thou shalt not commit adultery." The church interprets this commandment to cover adultery, fornication, various perversions, and certain remarriages ("Reasons for Which Members Shall Be Disciplined," Church Manual 247). The Church Manual comments: "The Church cannot afford to deal lightly with such sins, nor permit personal considerations to affect its action. It must register its decisive and emphatic disapproval of the sins of fornication, adultery, all acts of moral indiscretion, and other grievous sins" (p. 249).

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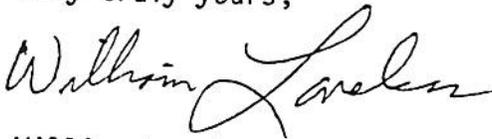
45 CFR 86.31, which deals with appearance: The Seventh-day Adventist church adheres to basic Biblical teachings that wearing apparel should be modest, jewelry should not be worn, and that there should be distinctions between men's and women's clothing. 1 Tim. 2:9, and Deut. 22:5. For more than one hundred years, the writings of Ellen G. White, considered inspired by God, have guided the Church in interpreting the above mentioned Biblical principles ("Clothing" and "Jewelry," Comprehensive Index to the Writings of Ellen G. White). The Church Manual states that "believers should recognize their bodies as the temple of the HOLY Spirit, and that therefore they should clothe them in neat, modest, dignified apparel" (pp. 36-37).

Columbia Union College, as a Church institution, is obligated to uphold the above religious standards in its relationships with its students and employees.

Columbia Union College believes it complies with the requirements of Title IX because it applies its religious principles and standards equally to students and employees of both sexes. It has requested these specific religious exemptions because it questions how the regulations promulgated under Title IX will be interpreted and applied to religious institutions, specifically to Columbia Union College.

Background information demonstrating that Columbia Union College is religiously controlled: The Seventh-day Adventist Church in the United States operates a number of universities and senior colleges, to provide for its youth the opportunity to do advanced study within the context of the Church's world view and sense of mission. Columbia Union College is owned and operated by the Seventh-day Adventist Church and is therefore an integral part of the Church. The College is listed in the Seventh-day Adventist Yearbook as a Seventh-day Adventist educational institution and thus comes under the Church's basic 501(c)(3) tax exemption. In addition, its board of directors is totally Seventh-day Adventist, as are its faculty and full-time staff.

Very truly yours,



William Loveless  
President

cc: Mr. Robert Harvey, Director  
Elder W. Coe, Chairman of Board  
Mr. L. Show, Business Manager  
Mr. L. Clarambeau, Student Finance