

November 15, 1988

Mr. Robert A. Smallwood
Regional Civil Rights Director
Region III
U. S. Department of Education
3535 Market Street, Room 6300
Philadelphia, PA 19104-3326

Dear Mr. Smallwood,

Thank you for your letter of November 4, 1988 and the notification that our requests for exemption from Title IX on matters of housing and employment are in order.

I apologize for the lack of clarity concerning marital and parental status and student membership practices.

More specific answers to your questions are that Title IX sections 106.21(c), 106.40, 106.57 and 106.60 may be interpreted to mean that any employment decision or disciplinary action taken based on our religious conviction, the heterosexual, monogamous, faithful marital relationship is the standard would be discriminating. Our conviction is based on: I Tim. 5:14,15; I Corin. 7:36; Matt. 19:5, I Corin. 7:12,13; Westminster Larger Catechism Question 139: "What are sins forbidden in Seventh Commandment?... having more wives or husbands than one at the same time, unjust divorce or desertion...". And The Testimony of the Reformed Presbyterian Church of North America, pp. 64-68, Chapter 24, "Of Marriage and Divorce."

Further the position of our doctrinal standards is that parents have the ultimate responsibility for the discipline of their young people. We often feel religiously obligated to involve the assistance of parents in discipline procedures. This is based on Matthew 15:4-6, Ephesians 6:1-7, Hebrews 12:9, Westminster Larger Catechism Questions 124-128, The Testimony of the Reformed Presbyterian Church of North America pp. 68-70, "Education of Children."

In reference to Section 106:14 we are concerned because of our conviction that, in order to have extra curricular Christian ministry student groups, we are obligated by the Scriptures and our doctrinal standards to ask for a Christian profession of faith on the part of the students participating in these kinds of

Mr. Robert A. Smallwood
November 15, 1988
Page 2

groups. Such a conviction is based on Matthew 10:32, II Corin. 6:14-18, The Testimony of the Reformed Presbyterian Church of North America, which was previously forwarded, pp. 73-74, "The Communion of Saints," p. 39, "Of Good Works" p. 40, sections 2 and 3.

Thank you for your prompt consideration of our previous correspondence. I trust the additional information provided in this letter will meet the concerns you have addressed. If you have further questions, or need further information, please let us know.

Sincerely yours,

W. Joseph McFarland
President

WJM/bm