GRACE COLLEGE
GRACE THEOLOGICAL SEMINARY

Office of the President

STATEMENT OF EXEMPTIONS FROM TITLE IX

In accordance with provisions provided in part 86.12 of Title IX, Grace Schools are claiming three exemptions because of conflicts between specific tenets of our organization and subparts of Title IX. Grace College and Grace Theological Seminary are united under one administrative organization that is affiliated with the Fellowship of Grace Brethren Churches and committed to the doctrines of God as set forth in the Bible.

On the above grounds, the following exemptions are being claimed:

(1) Since Grace Theological Seminary is an institution whose program is specifically for the education of students to prepare them to become ministers or to prepare them to teach theological subjects, an exemption is being claimed in its admission procedure.

(2) An exemption is being claimed because of the requirement of male sex as a bona-fide occupational qualification for teaching Bible courses in the College and for professors in the Seminary. All other faculty positions in the College are non-discriminatory on the basis of sex.

(3) The final exemption is being claimed for the male sex as a bona-fide occupational qualification for appointment to membership on Advisory Committee to the President. The Advisory Committee to the President is composed of the six main administrative officers of the institution: The Vice President, the Dean of the Seminary, the Academic Dean of the College, the Dean of Students of the College, the Director of Business Affairs, and the Director of Development. All other positions under these main officials in the college are non-discriminatory on the basis of sex.

Date Sept. 30, 1976 (signed) Homer A. Kent, Jr.

Homer A. Kent, Jr., President

SELF-STUDY OF GRACE COLLEGE AND GRACE THEOLOGICAL SEMINARY

FOR TITLE IX

The following report is the self-study of Grace College and Grace Theological Seminary as mandated under Title IX, 45 C.F.R. 86.3.

The organization of this report adheres to the organization as set forth in part 86 of Title IX, C.F.R. 45., entitled, "Non-discrimination on the basis of sex in educational programs and activities receiving or benefiting from federal assistance."

As stated in part 86.3 paragraph (d) we shall "maintain on file for at least three years following completion of the evaluation required under paragraph (c) ". . . description of modifications made in review of requirements and remedial steps taken."

86.8

The Director of Business Affairs has been designated as the responsible employee to coordinate efforts of the institution under the provisions of Title IX.

Employees and students are being notified of the grievance procedures as specified in Title IX. These grievance procedures will also appear in the next version of the student, faculty, and staff handbooks.

86.9

The offices of Admissions, Registrar, and Academic Deans have been instructed to revise on applications for admissions, for employment applications for staff and for employment applications for faculty, to include a statement of the nature that Grace College does not discriminate in either admissions or employment regarding marital status of a candidate but does require the candidate's adherence to the moral laws of God as set forth in the Bible.

As required under part 86.9 (a) (2), notice - of the self-evaluation study has appeared in the campus bulletin.

86.12

Following the provisions as set forth in part 86.12 paragraphs (a) and (b), a claim requesting partial exemption is attached to this self-evaluation. As stated in part 86.12 paragraph (b) our claim for exemption will, "identify provisions of this part which conflict with specific tenets of the religious organization." It is also our understanding as stated in paragraph (b) of part 86.12 that this submitted request will be signed by the highest ranking official of the institution (the president).

86.15

Grace College has never and does not discriminate on the basis of sex in the admission of students. A statement of this nature is set forth in the catalog of the college.

An exemption as provided in part 86.12 paragraph (b) is being claimed by Grace Theological Seminary. The claim is based on the grounds that Grace Theological Seminary is an institution whose program is specifically for the education of students to prepare them to become ministers or to prepare them to teach theological subjects.

86.17

Grace College is implementing athletic program changes required to eliminate minor discrepancies that have existed in the past. For example, the athletic budget has only five $100 athletic scholarships available. The distribution proposal for the athletic budget next year will award two of these scholarships to women athletes and three to men athletes.

86.21

Grace College does not discriminate between men and women in applying its standard with respect to violation of the moral laws of God concerning premarital sex and the results thereof. Inquiry concerning marital status on the application form is made equally of men and women.

86.22 86.23

Grace College does not give preference for admission to the college on the basis of sex and has a nondiscriminatory recruitment policy.

Grace Theological Seminary claims an exemption as provided in part 86.12 paragraph (b) and stated partially in part 86.15 of this self-evaluation. A more complete report of the exemptions claimed under part 86.12 accompanies this self-evaluation and same is signed by the president of Grace Schools.

86.31 (1)

Grace College does not discriminate between men and women on the assignment of aid, benefit, or service relative to loans and scholarships except as shown in part 86.31 paragraph (2).

86.31 (2)

The proposed athletic budget including a readjustment of scholarship awards between men and women is discussed in part 86.17 paragraph 1, above.

86.32

Board charges in college owned and controlled housing are equal for men and women. The college controls standards of quality in all of its housing facilities. The college strictly enforces it housing policy that states that all students under twenty three years of age must live in campus owned housing. The few exceptions to this rule are clearly pointed out in the student handbook. Requests by students for non-campus housing, following the approved provisions as stated in the student handbook, are handled with equality.

86.33

Grace College does have separate locker room and shower facilities for men and women. The separate facilities are comparable in quality.

86.34

Catalog offerings are on a non-discriminatory basis. Physical Education classes allow for enrollment of both men and women in all areas, except contact sports.

86.36

All testing material used by Grace College for counseling purposes are identical for men and women.

86.37 (a) (b)

There are a few restricted scholarships for both men and women. However, with over two-thirds of the student body receiving some form of financial assistance the overall effect of financial assistance is non-discriminatory on the basis of sex. Loans and scholarships other than the restricted scholarships are dispersed on the basis of non-discriminatory criteria.

86.37 (c)

The transition plan as discussed in part 86.17 paragraph (a) will insure a reasonable balance between men and women especially considering the opportunities and number of men and women students participating in intercollegiate athletics.

86.38

Grace College does not discriminate in job opportunities made available to students on the basis of sex. Positions are open equally for men and women and remuneration for employment is according to the job.

86.39

Health insurance benefits and services are equally available to men and women students. Gynecological care is included in health insurance coverage for employees of Grace Schools.

86.40

The distinctions made clear by Scripture regarding the sexes are accepted by Grace College and Grace Theological Seminary. The application of Scriptural mandates is applied equally to both sexes. Scriptural principles of this nature are clearly set forth in the student handbook which each student receives before arriving on campus. Grace College and Grace Theological Seminary will take all appropriate measures to maintain and preserve these Scriptural distinctives.

86.41

Both men and women may serve on intercollegiate athletic teams, except in contact sports. Opportunities for intercollegiate and intramural sports are available for men and women. The opportunities available for intercollegiate athletic teams for women are largely based on interest. Where there is no team in a particular sport for women, except for contact sports, a woman may try out for the men's team. For example, this September several women wanted to try out for the men's tennis team. Since the women did not have an opportunity for a women's team and since tennis is a non-contact sport, the women were encouraged to try out for the men's tennis team.

Grace College has only one gym but the availability of equipment is equal between men and women. The scheduling of games and practices are determined by the number of men and women participating in inter-collegiate athletic teams and the number of games played by the men's and women's athletic teams. Coaches are available for all sports and compensation is assigned on the basis of the college's salary scale, which is non-discriminatory on the basis of sex. Health care and medical services are available to men and women. Men's and women's programs and schedules are covered in school publications and by the college newspaper services.

86.51

Employment opportunities in educational programs are available to either men or women. An exemption is claimed only in the Bible course offerings on the basis of part 86.12 paragraphs (a) and (b). The attached explanation of part 86.12 explains that the male sex is a bona-fide occupational qualification for this position according to a specific tenet of our religious organization. Rates of pay are non-discriminatory and advertising is by position which is open to either sex. Fringe benefits are equal for men and women and pregnancy is treated as a temporary disability following the provisions as set forth in the Faculty and Staff Handbooks.

86.54

Compensation is non-discriminatory on the basis of sex. Where there is equal work on jobs which require equal skill, effort, and responsibility and working conditions, there is equal compensation.

86.56

Fringe benefits are equal for men and women. Normal retirement for men and women is 65. Where there is need, and where the employee desires to continue the relationship, there is equal opportunity given to either sex after 65.

Grace College and Grace Theological Seminary have a consistent policy for both male and female employees and students that is governed by adherence to the moral laws of God as set forth in the Bible.

86.60

Grace College solicits information on marital status equally from both men and women.

86.61

There is no discrimination on the basis of sex in employment opportunities except for the exemptions claimed, following the provision as stated in part 86.12. According to our specific religious tenets of organization only a male with appropriate qualifications can be accepted for employment as either a professor in Grace Theological Seminary, a professor of Bible Courses, or for a position of the Advisory Committee. "The Advisory Committee to the President is composed of the six main administrative officers of the institution: The Vice-President, the Dean of the Seminary, the Academic Dean of the College, the Dean of Students of the College, the Director of Business Affairs, and the Director of Development."

DATE Sept. 30, 1976 (signed) Homer A. Kent, Jr.

Homer A. Kent, Jr., President