



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF THE ASSISTANT SECRETARY FOR CIVIL RIGHTS

SEP 20 1985

Dr. John W. Conley  
President  
Mid-America Bible College  
3500 S.W. 119th Street  
Oklahoma City, Oklahoma 73170-9797

Dear President Conley:

The Office for Civil Rights of the Department of Education (OCR/ED) has reviewed your response to OCR's letter of July 18, 1985, which requested clarification of Mid-America Bible College's (formerly Gulf-Coast Bible College in Texas) request for a religious exemption from Title IX of the Education Amendments of 1972.

In your response, you describe certain policies practiced at Mid-America Bible College as consistent with the tenets of the religious organization that controls the institution. These policies would violate certain sections of the regulation implementing Title IX (copy enclosed) absent a religious exemption. You have supplied information that establishes that the institution is controlled by a religious organization and that tenets followed by this organization conflict with specific sections of the Title IX regulation. Therefore, I am granting Mid-America Bible College an exemption to those sections of the Title IX regulation specified in your August 20, 1985, letter. The exemption is limited to the extent that compliance with the Title IX regulation conflicts with the religious tenets followed by the institution. Mid-America Bible College is hereby exempted from the requirements of the following sections of the Title IX regulation: 34 C.F.R. §§ 106.21(c), 106.40 and 106.57. The basis for our decision to grant this exemption is discussed in further detail below.

The Constitution and Bylaws of the College indicate that the institution is a general agency of the Church of God and is responsible to the General Assembly of the Church of God. The College is controlled and operated by a Board of Trustees whose members are elected by the General Assembly. This relationship between the Church of God and Mid-America Bible College adequately establishes that Mid-America Bible College is controlled by a religious organization as is required for consideration for exemption under § 106.12 of the Title IX regulation.

In your August 20 letter, you state that both staff and students would be asked to leave the institution if they engaged in premarital or extramarital sex or had an abortion without being married. Thus, the College denies enrollment and employment to students and staff who violate the institution's

"Judea-Christian concept of sexuality[.]" Based on these practices, Mid-America Bible College has requested and is granted by this letter exemption to: 34 C.F.R. § 106.21(c) (marital and parental status of applicants for admission), § 106.40 (marital and parental status of students) and § 106.57 (marital and parental status of employees).

This letter should not be construed to grant exemption from any section of the Title IX regulation not specifically mentioned. In the event that OCR receives a complaint against the College, we are obligated to determine initially whether the allegations fall within the exemption herein granted. Also, in the unlikely event that a complainant alleges that the practices followed by the College are not based on the religious tenets of the controlling organization, OCR is obligated to contact the controlling organization to verify those tenets. If the organization provides an interpretation of tenets that has a different practical impact than that described by the College, or if the organization denies that it controls the College, this exemption will be rescinded.

I hope this letter responds fully to your request. I regret the inordinate delay in responding to your original request. If you have any questions, please do not hesitate to contact the Dallas Regional Office for Civil Rights. The address is:

Taylor D. August  
Regional Civil Rights Director  
Office for Civil Rights, Region VI  
Department of Education  
1200 Main Tower Building, Suite 400  
Dallas, Texas 75202

Sincerely,

*Alicia Caro for*

Harry M. Singleton  
Assistant Secretary  
for Civil Rights

Enclosure

cc: Taylor D. August, Regional Civil Rights Director, Region VI