



Dr. D.V. Hurst, President

July 29, 1988

Ms. LaGree Daniels  
Assistant Secretary for Civil Rights  
United States Department of Education  
330 C Street, S.W.  
Washington, D.C. 20202

Re: Title IX Exemption Application  
Northwest College of the Assemblies of God,  
a Washington non-profit corporation

Dear Ms. Daniels:

I am writing in my capacity as the highest ranking administrative official of Northwest College of the Assemblies of God, a Washington non-profit corporation.

Northwest College of the Assemblies of God (the "College") hereby requests an exemption from the requirements of Title IX of the Education Amendments of 1972 ("Title IX") as herein specified, pursuant to Sections 901 (a) (3) and 908 of Title IX and 34 C.F.R. Section 106.12(b).

**The College is controlled by a religious organization.** The College is a regionally accredited Christian college, endorsed by the American Association of Bible Colleges and the General Council of the Assemblies of God. The College offers degrees in Certificate in Christian Studies, Associate of Arts, Bible Diploma and Bachelor of Arts. The College is owned and controlled by the Northwest District Council of the Assemblies of God (Washington and Northern Idaho), the Montana District Council of the Assemblies of God, the Southern Idaho District Council of the Assemblies of God, and the Wyoming District Council of the Assemblies of God. The District Councils are associations of churches in these states, and they are members of The General Council of the Assemblies of God ("General Council")--an association of 11,000 churches, 57 District councils, and 2 million members in the United States. The General Council has been recognized by the Internal Revenue Service to be exempt from federal income taxation as a religious organization described in section 501(c)(3) of the Internal Revenue Code. The General Council also has obtained a group exemption ruling from the Internal Revenue Service, recognizing the exempt status of all of its affiliated District Councils and churches.

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The Directors of the College and the faculty, students and employees of the College are all required to espouse a personal belief in the religious tenets of the Christian faith. The Articles of Incorporation and By-Laws [enclosure "A" & "B"], the catalog [enclosure "C"] and other official publications of the College contain explicit statements that the College is committed to the doctrines of the General Council, and the College is completely governed by the Assemblies of God. The College maintains its religious tradition, standards and beliefs in accordance with the requirements of the College and the General Council.

**Compliance with Title IX would conflict with specific tenet(s) of the Assemblies of God.** The College adheres to biblical tenets for matters of faith and practice, following its religious tradition and denomination. The constitution of each of the District Councils adopts the General Council's "Statement of Fundamental Truths"--a listing of 16 fundamental doctrinal precepts. The College's articles of incorporation and constitution and bylaws also adopt these doctrinal precepts. Accordingly, the personnel and students of the College accept religious standards in matters of moral behavior, dispute and grievance resolution and disciplinary matters, as well as in the performance of any religious role or office in which gender distinctions may be required. The Holy Bible and the "Statement of Fundamental Truths" sets forth the standards for Christian morality and practice in far too many places and forms to be identified comprehensively in this letter. However, two tenets that are especially pertinent are:

The Scriptures, both the Old and New Testaments, are verbally inspired of God and are the revelation of God to man, the infallible, authoritative rule of faith and conduct.

Sanctification is an act of separation from that which is evil, and of dedication unto God. By the power of the Holy Ghost we are able to obey the command: "Be ye holy, for I am holy." Sanctification is realized in the believer by recognizing his identification with Christ in His death and resurrection, and by faith reckoning daily upon the fact of that union, and by offering every faculty continually to the dominion of the Holy Spirit.

At a minimum, compliance by the College with 34 C.F.R. sections, 106.20(c), 106.40(b), and 106.57 would conflict directly with these tenets of the College and its controlling religious organization. These provisions of Title IX prohibit discrimination based on pregnancy or childbirth in student

recruitment and employment, and in educational programs and activities. These requirements conflict directly with the relevant tenets quoted above, since compliance would in some cases contradict the Bible and our church's view on sanctification. The conflict could occur in a number of ways. Consider the following:

- 1) an unmarried female student becomes pregnant;
- 2) a female applicant for admission informs the College that she is pregnant or has one or more biological children but has never been married; or,
- 3) a married female student becomes pregnant because of an adulterous relationship with another student or third party.

In the first and third examples, the student would be dismissed. In the second example, the applicant would not be admitted to the College.

In addition, the College, pursuant to its required tenets of faith, maintains its religious freedom to make certain gender distinctions in matters of moral behavior, pregnancy, marriage and residential living environments, and other moral standards. These religious standards are held for personnel and students and are matters conducive to the fostering of proper moral behavior and the discouragement of inappropriate behavior as required by the religious tradition, tenets of faith of its controlling religious organization and Biblical truth. Such standards also include matters relating to the expression of human sexuality, living environments, respect for the institution of marriage, language and attire. At the College matters of moral behavior, including the misuse of human sexuality, is adjudicated in accordance with scriptural teaching about moral behavior.

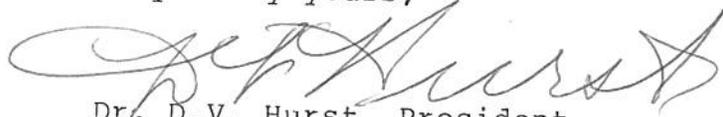
The College requests exemption from the application of the Title IX regulations since such regulations specifically conflict with the tenets of our controlling religious organization.

The College also specifically claims its right to exercise a religious preference in its employment decisions, pursuant to Section 702 of Title VII of the Civil Rights Act of 1964 and the decision of the Supreme Court in Corporation of the Presiding Bishop v. Amos, 107 S. Ct. 2862 (1987). The College shall not under any circumstances waive or be deemed to have waived its primary requirement of hiring only persons whose religious beliefs and practices are consistent with the Christian tenets, principles and traditions accepted by the College and our controlling religious organization.

In the event of any future amendments to Title IX or the regulations thereunder, or changes in the application thereof or the facts surrounding the operation of the College, the College reserves its right to apply to the Department of Education for an amendment to this exemption or an additional exemption in order to fully protect the religious tenets, practices and traditions of the College and our controlling religious organization.

Thank you for your assistance and for your prompt confirmation of our exemption. If you have any questions or require any further information, please contact Dr. Randall K. Barton, Vice-President for Development, Northwest College of the Assemblies of God, (206) 822-8266.

Very truly yours,



Dr. D.V. Hurst, President  
Northwest College  
of the Assemblies of God

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Enclosures