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November 18, 1988

Assistant Secretary for Civil Rights
United States Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Re: Title IX Religious Exemption

Dear Sir:

Philadelphia College of Bible hereby claims 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 believes that it may in the past have received, and may currently be receiving, indirect federal aid within our understanding of the Supreme Court decision in Grove City College v. Bell, 465 U.S. 555 (1984).

Philadelphia College of Bible is a regionally accredited college, offering courses of instruction in Bible, the humanities, arts and sciences and professions. The College is a non-profit corporation which was incorporated in the State of Pennsylvania in 1915 as a Christian institution of higher education under the control of a board of trustees, and is exempt from federal income taxation as a not-for-profit institution under Section 501(c)(3) of the Internal Revenue Code. The board of trustees 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 Charter of the Corporation and the catalogs and other official publications of the College contain explicit statements that the College is committed to the doctrines of the Christian religion. The College maintains its religious tradition, standards and beliefs in accordance with the requirements of the Bylaws.

The College adheres to biblical tenets for matters of faith and practice, following its religious tradition. It

OFFICE OF THE PRESIDENT

Philadelphia College of Bible

Langhorne Manor, Langhorne, PA 19047/(215) 752-5800

specifically utilizes a religious preference in employment practices to assure that faculty and staff adhere to a common understanding of the religious beliefs, values and purposes that guide the educational mission of the College. Accordingly, the personnel 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 sets forth the standards for Christian morality and practice in far too many places and forms to be identified comprehensively in this letter; however, see, for example, the following "Community Life and Standards" as taken from the College's Student Handbook, pages 41-44.

Community Life and Standards

Philadelphia College of Bible is a community of students, faculty, staff and administration who are joined together for the purposes of academic enrichment, personal development, spiritual growth and preparation for Christian ministry. Relationships and responsibilities in this community are built upon (1) the teachings and principles of the inerrant and authoritative Word of God (2 Tim. 3:16, 17), (2) the personal accountability of each member to a loving and sovereign God (1 Peter 1:17), and (3) the inner resources and attributes of the Holy Spirit to guide and minister to each other in all relationships (John 16:13, 14).

The PCB family community seeks first and foremost to achieve the goal of 1 Corinthians 10:31: "Whether you eat or drink or whatever you do, do all to the glory of God." All activities and relationships should seek to accomplish this ultimate objective.

In relationship with each other, members are to be guided by the following scriptural admonitions:

LOVE, 1 John 3:11

"For this is the message that ye heard from the beginning, that we should love one another."

EDIFICATION, Romans 15:1, 2

"We then that are strong ought to bear the infirmities of the weak, and not to please ourselves. Let every one of us please his neighbor for his good to edification."

BEARING ONE ANOTHER'S BURDENS, Galatians 6:2

"Bear ye one another's burdens, and so fulfill the law of Christ."

SPEAKING THE TRUTH IN LOVE, Ephesians 4:15

"But speaking the truth in love, may grow up into Him in all things, which is the head, even Christ."

RESPONSIBILITY TO OTHER BELIEVERS, 1 Corinthians 8:9

"But take heed lest by any means this liberty of yours become a stumblingblock to them that are weak."

RESTORATION AND RESTITUTION, Galatians 6:1

"Brethren, if a man be overtaken in a fault, ye which are spiritual restore such an one in the spirit of meekness; consider thyself, lest thou also be tempted."

The following standards and expectations apply to all students of PCB:

1. The Lord's Day (Sunday) is set apart primarily for worship, fellowship, ministry and rest for God's people. Therefore, College programs, services and athletic events are not sanctioned and encouraged except where absolutely necessary.
2. Scripture specifically prohibits stealing, sexual immorality, lying, cheating, gossiping, evil speakings against one another, profane language, occult practices and attitudes such as pride, lust, bitterness, jealousy and an unforgiving spirit. These prohibitions are clearly understood to be biblical commands that are binding upon every Christian believer.
3. Since there is great danger to one's physical and psychological well-being with the use of certain elements, one is to refrain from the use of tobacco, alcoholic beverages, hallucinogenic drugs and substances (including marijuana) or narcotics not authorized by a physician. Under no circumstances are the above to be used, possessed or distributed on or away from campus. Attendance at night clubs, bars and similar places is to be avoided.
4. Gambling is viewed as an unwise use of God-given resources and therefore is not acceptable in any form. Students are not attend places where gambling is the source of business or entertainment. Playing cards

normally associated with gambling are not permitted in College facilities, on College grounds or off-campus at College-sponsored activities.

5. Because a significant number of evangelical Christians view social dancing as a morally questionable activity, society dancing is not permitted on or away from the campus. Choreography in drama and musical productions is permitted.
6. Pornographic materials are destructive and immoral and are not to be used, possessed or distributed on or away from campus.
7. The College expects its members to be sensitive regarding the Christian testimony of their personal lives in representing the Church of Jesus Christ and Philadelphia College of Bible.

Students are to be highly selective in their choices of entertainment and recreation including television, video cassettes, sports, reading materials and music. Biblical standards, especially those in reference to immorality, worldly values, violence, profanity, sexuality and nudity, should serve as guidelines in making personal discretionary decisions in these areas. In addition, personal responsibilities in the areas of academics, employment and finances should also influence decisions concerning entertainment.

There are varying attitudes among Christians regarding attendance at movie theaters. That being the case, the College desires not to be offensive to the conscience of any believer. Students are not permitted to attend movie theaters while registered for an academic semester. At other times students are free to make discretionary decisions in these areas, while being sensitive and submissive to the standards of their local church and family.

8. Any kind of demeaning gesture, threat of violence or physical attack directed toward another person will not be tolerated. Vandalism and stealing of property, services or goods are also unacceptable.
9. Because of the biblical teaching concerning the dignity and worth of every person, discrimination against others

on the basis of race, national origin, sex or handicap is not acceptable.

10. Students are subject to the responsibility of academic integrity which demands honesty and giving credit to the proper sources.

STUDENT RESPONSIBILITY

For the welfare of the entire community, it is important that each member act responsibly. This entails a concern for all members of the body. When a student is aware that another student has violated the standards of conduct, the former should approach the latter in a spirit of humility and concern and encourage that person to acknowledge any wrongdoing to the Lord and to the proper College authority, thus seeking restoration. It is the responsibility of both students to ensure that the matter is resolved with the College. If the student who has committed the wrong is unwilling to admit the infraction to College authorities, the student who has expressed concern has the responsibility to discuss the matter with one of the student development deans, after first informing the erring party of such intention (Galatians 6:1-5)

The College seeks to maintain its religious freedom to make certain gender-based distinctions in matters of moral behavior, marriage and residential living environments and standards. It specifically holds religious standards for personnel and students in matters conducive to the fostering of proper moral behavior and the discouragement of inappropriate behavior as understood by the religious tradition and tenets accepted by the College. Such standards include matters relating to the expression of human sexuality, living environments, respect for the institution of marriage, language and modest attire.

The College adjudicates matters of moral behavior, including the misuse of human sexuality, in accordance with Scriptural teaching about moral behavior. See, for example, the following "Couples' Decorum" as taken from the College's Student Handbook, pages 44-45.

Couples' Decorum

The College is sincerely anxious that all of its students maintain wholesome relationships with members of the opposite sex as God intended. It is also recognized that we live in a society that minimizes the interpersonal

aspects of such relationships and perverts God's intentions by emphasizing only the physical.

The College believes that dating serves several positive biblical purposes. First, it develops the individual's ability to communicate with others while also developing social and cultural interests, skills, and personal attractiveness. Second, the total personality of the individual is recognized, developed and reined as a result of varied dating experiences. Third, through the dating process those who eventually marry will select their life's partner. The process of dating gives the individual opportunity to follow the principles outlined in the Scriptures for the selection of a life partner.

In order to accomplish these goals, it is imperative that PCB students in training for vocational Christian ministries remember that an overemphasis upon the physical attraction of one's date will have detrimental effects. Because the Christian's body is the temple of the Holy Spirit, the College expressly forbids physical displays of personal affection (other than the holding of hands) in all College areas and at all College activities. This includes physical contact such as back rubs. All contacts known as "petting" are forbidden under any circumstance.

The College hereby claims exemption from the application of the Title IX regulations, to the extent that they conflict with the College's religious tenets and traditions as described above.

There are a number of issues central to the religious beliefs and practices of the College that may not have been discussed in this letter because of our understanding that no specific exemption is required. For example, the College believes that Title IX, as amended by the Civil Rights Restoration Act of 1987, shall not be construed to require the College to provide or pay for any benefit or service, including the use of facilities, related to an abortion. Additionally, pursuant to 34 C.F.R. Section 106.15(d), the provisions of Sections 106.16 through 106.23, inclusive, do not apply to the higher education. Finally, the College understands that Sections 106.32 and 106.33 permit the College to provide separate, although substantially comparable, housing, bathroom, locker room and similar facilities for men and women.

The College generally opposes gender-based discrimination and affirms its intention to comply with the provisions of Title IX and the regulations thereunder except to the extent that such

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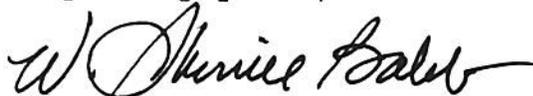
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compliance would cause the College to violate its religious tenets and traditions. The College specifically claims its right to exercise a religious preference in its employment decisions, pursuant to Section 702 of Title VII of the Civil Rights Act of 1964 and the decision of the Supreme Court in Corporation of the Presiding Bishop v. Amos, 107 S. Ct. 2862 (1987). In seeking to provide equal employment opportunities for men and women, 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 practice are consistent with the Christian tenets, principles and traditions accepted by the College and the Corporation.

In the event of future amendments to Title IX or the regulations thereunder, or changes in the application thereof or the facts surrounding the operation of the College and the burden of such statute and regulations on the College's ability to pursue its religious mission, the College reserves its right to claim an amendment to its exemption or an additional exemption in order to fully protect the religious tenets, practices and traditions of the College.

Thank you for your assistance and for your prompt consideration of this letter. If you have any questions or require any further information, please contact Kenneth A. Kaighn, who is the senior vice president for administrative affairs of the College, at (215) 752-5800.

Very truly yours,



W. Sherrill Babb, Ph.D.
President

WSB/clw