



THE CATHOLIC  
UNIVERSITY  
OF AMERICA

WASHINGTON D. C. 20064

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Jan P.H.  
12/5*

November 13, 1975

Mr. Peter Holmes, Director  
Office of Civil Rights  
U. S. Department of Health, Education and Welfare  
Washington, D. C. 20201

Dear Mr. Holmes:

The Catholic University of America has long been committed to a policy of equal opportunity in admissions, employment, and programs. Consequently it subscribes to the fundamental principles embodied in Title IX of the Education Amendments of 1972.

I preface what follows by noting that the Regulations are not the law and may, indeed, misrepresent--possibly inadvertently--what Congress intended. To illustrate: In Paragraph 86.12, HEW uses a "loaded" word in the very title of the paragraph when it refers to "Educational institutions controlled by religious organizations" (emphasis mine).

This University is controlled by an elected and autonomous Board of Trustees. This University is fully accredited. It possesses more formal independence than many state universities. Its faculty operate with all the traditional rights and privileges enjoyed by faculties in higher educational institutions throughout the country.

The Catholic University of America is a "sponsored" institution. As an institution sponsored by the Roman Catholic Church, it will not subscribe to certain of the Regulations issued by the Department of Health, Education and Welfare. Specifically, the University cannot and will not provide health or medical insurance coverage for abortions, nor be held to any other regulation which would countenance the practice of abortion by members of the University community, nor will it be party to regulations whose practical impact is to encourage premarital sexual relations.

Accordingly, under Paragraph 86.12 of the Regulations, The Catholic University of America claims exemption on religious grounds from the following Paragraphs:

86.31, 86.39, 86.40, 86.51, 86.56, 86.57,

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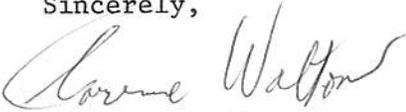
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insofar as these--or any other of the Regulations--may mandate or be interpreted to require the provision of insurance or other benefits to students or employees for the voluntary termination of pregnancy, or to prohibit the University from adopting and following policies designed to discourage such unacceptable practice.

Sincerely,

A handwritten signature in cursive script, appearing to read "Clarence C. Walton".

Clarence C. Walton  
President