



THE MASTER'S  
UNIVERSITY

PRESIDENT  
DR. JOHN MACARTHUR

EXECUTIVE VICE PRESIDENT  
DR. LEE DUNCAN

October 5, 2016

Seth Galanter  
Principal Deputy Assistant Secretary  
Office of Civil Rights, U.S. Department of Education  
400 Maryland Ave. S.W.  
Washington, D.C. 20202-1100

Dear Mr. Galanter:

I am responding to your letter of September 13, 2016, which requested further information regarding our application for a religious exemption from the Title IX Education Amendments of 1972. I will respond to each of your requests in the paragraphs that follow.

The Master's University and Seminary's doctrinal foundation, established 90 years ago in 1927, is rooted in biblical fidelity and historic orthodox Christianity. Our very name indicates our commitment to serve our Lord and Master, Jesus Christ. We have recently changed our name from "college" to "university" based on the institution's growth and the addition of graduate programs. The University & Seminary believes that the Bible is inerrant truth, providing knowledge and direction for all of life, including gender identity and human sexuality.

The By-Laws of The Master's University & Seminary state:

**Section 3.** *The Master's University and Seminary is a ministry approved by the Board of Elders of Grace Community Church, Sun Valley, California, with a line of spiritual authority established and maintained by a representative on The Master's University and Seminary Board of Directors.*

The doctrinal statement of Grace Community Church and of the University and Seminary are exactly the same. The pastor of Grace Community Church also is the president of the University & Seminary. The chair of the Elder Board is required to sit on the Board of Directors of the University & Seminary to ensure doctrinal fidelity and agreement with to the teaching of Grace Community Church, which has a membership of more than 8,000. Grace Community Church is the controlling organization and its doctrinal statement directs the beliefs and teaching at the University and Seminary.

We cannot give support to the most recent interpretations of Title IX regarding sexual activity and gender, which is why we have asked for the religious exemption that will allow us to

beautiful place for seminarians to study. The fair market rental of the facilities would be significant; therefore, this financial provision for the University & Seminary is also significant. The University also uses the facilities of Grace Community Church on occasion for conferences and special events.

The financial gifts from Grace Community Church to The Master's University & Seminary are also significant. Our Development Department reports that 15% of all donors to the University & Seminary are from Grace Community Church, and approximately 35% of total gift income comes from these donors.

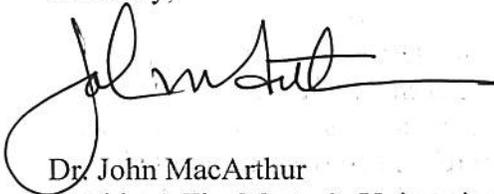
As to your question of how Grace Community Church exercises control over the University & Seminary, the By-Laws stipulate that the University & Seminary has been established and maintained by the church. The pastor of Grace Community Church serves as the president of the University & Seminary, directing day-to-day operations under his oversight. He provides leadership to the University & Seminary and ensures that the direction of the institution is consistent with the direction of Grace Community Church in its beliefs and doctrines. The chair of the Elder Board, which is the governing body of Grace Community Church, serves on the University & Seminary Board of Directors as a safeguard to ensure that the institution stays consistent with Grace Community Church. The institution meets all of the requirements to be considered "under the control" of Grace Community Church.

Our previous communication to you included a copy of The Master's University & Seminary By-Laws, as well as a copy of the Doctrinal Statement that is consistent with Grace Community Church's long-established statement.

We are not withdrawing our request, but rather affirming that we are eligible for the exemption based the religious exemption clause provided by the Department of Education in 1972 and approved by the United States Congress.

Thank you for your consideration; I trust that this information provided will allow you to proceed with our request.

Sincerely,



Dr. John MacArthur  
President, The Master's University & Seminary