

APR
WALLA WALLA COLLEGE



March 21, 1979

COLLEGE PLACE, WASHINGTON 99324

PHONE (509) 527-2121

Mr. Waite H. Madison, Jr.
Acting Director
Division of Postsecondary Education
Office of Compliance and Enforcement
Office for Civil Rights
Department of Health, Education, and Welfare
Washington, D. C. 20201

Dear Mr. Madison:

Your recent letter regarding our request for exemption from certain provisions of the Title IX regulation has been studied and the enclosed attachment represents our position.

I believe we have answered the specific religious tenets and provisions of the regulation that are in conflict, and we have also provided background information indicating our church affiliation.

Should you require additional explanation or clarification, please do not hesitate to advise us. Thank you for your understanding in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "N. Clifford Sorensen".

N. Clifford Sorensen
PRESIDENT

NCS:rlp
Enclosure

WALLA WALLA COLLEGE STATEMENT OF CONFLICT
REGARDING PROVISIONS OF TITLE IX

In the Title IX assurance form previously filed with the Department of Health, Education, and Welfare, Walla Walla College requested that it be granted exemptions, as provided for in 45 CFR §86.11, from certain provisions of Title IX regulations because they appeared to be in conflict with certain religious teachings of the Seventh-day Adventist Church, of which Walla Walla College is an integral part. Specifically, Walla Walla College requested exemptions from the following regulations on the grounds hereinafter stipulated.

45 CFR §§86.21, 86.40, and 86.57 which pertain to marital and parental status: The eighth Fundamental Belief of the Seventh-day Adventist Church states "that the law of the ten commandments points out sin" (Church Manual 33). The seventh commandment, Exodus 20:14, states, "Thou shalt not commit adultery." The church interprets this commandment to cover adultery, fornication, various perversions, and certain remarriages ("Reasons for Which Members Shall be Disciplined," Church Manual 247). The Church Manual comments: The church cannot afford to deal lightly with such sins, nor permit personal considerations to affect its action. It must register its decisive and emphatic disapproval of the sins of fornication, adultery, all acts of moral indiscretion, and other grievous sins" (p. 249).

45 CFR §86.31 which deals with regulations governing student appearance: The Seventh-day Adventist Church adheres to basic Biblical teachings that wearing apparel should be modest, that jewelry should not

be worn, and that there should be distinctions between men's and women's clothing (1 Tim. 2:9 and Deut. 22:5). For more than one hundred years the writings of Ellen G. White, considered to be divinely inspired, have guided the church in interpreting the above-mentioned Biblical principles ("Clothing and "Jewelry," Comprehensive Index to the Writings of Ellen G. White). The Church Manual states that "believers should recognize their bodies as the temple of the Holy Spirit, and that therefore they should clothe them in neat, modest, dignified apparel" (pp. 36-37).

Walla Walla College, as a church institution, is obligated to uphold the above religious standards in its relationships with its students and employees.

Walla Walla College believes it is in compliance with the requirements of Title IX because it applies its religious principles and regulatory standards equally to students and employees of both sexes. It has requested these specific religious exemptions because it is not clear as to how the regulations promulgated under Title IX will be interpreted and applied to religious institutions, specifically to Walla Walla College.

Background information demonstrating that Walla Walla College is religiously controlled: The Seventh-day Adventist Church in the United States operates a number of universities and senior colleges to provide for its youth the opportunity to do advanced study within the context of the church's world view and sense of mission. Walla Walla College is owned and operated by the Seventh-day Adventist Church and is, therefore, an integral part of the church. Walla Walla College is listed in the Seventh-day Adventist Yearbook as a Seventh-day Adventist educational institution

and thus comes under the church's basic 501 (c) (3) tax exemption. In addition the members of its constituency and board of trustees are Seventh-day Adventists, as are its faculty and staff.