



OFFICE OF THE PRESIDENT

December 21, 1988

Ms. LeGree S. Daniels
Assistant Secretary for Civil Rights
U. S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

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by [unclear] (LWS)

Dear Ms. Daniels:

With reference to the next-to-last paragraph of the attached letter of September 21, 1988, we are hereby requesting a waiver from certain provisions of the Civil Rights Restoration Act of 1987 that would require us to treat pregnancy/maternity in the same manner as any other temporary disability under our health and accident insurance plans which we make available to our students.

While our institution is not under the direct control of a religious organization, our purpose is to serve Christ and His church by providing undergraduate and graduate biblical and professional education that will equip men and women for Christian ministry worldwide; and by serving as a biblical and theological resource center for the equipping of Christian laymen and for the continuing education of pastors, missionaries, and other Christian workers. Each year the Board of Trustees, administrative officers, and the faculty subscribe to and sign the statement of doctrine which underlies our purpose.

Our request for waiver is predicated on the basis that application of the regulation would not be consistent with the religious tenets of the Washington Bible College/Capital Bible Seminary. We believe that the Holy Bible, central to all of our undergraduate and graduate educational programs, prohibits sex outside of the marriage relationship. Consequently, we do not want to be viewed as sanctioning it as a result of being required to include pregnancy/maternity benefits in the health and accident insurance plans offered to our female students, most of whom are unmarried.

We do want to be able to make available to married female students insurance plans with pregnancy/maternity benefits, but with the option of an additional cost premium.

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We understand that the law does not require us to offer health and medical insurance to students, but that if we do, we cannot discriminate in application of the program. So an obvious solution to our problem, if we were denied a waiver, would be not to make such programs available to students. This, however, would not be in the best interest of our overall student body.

Therefore, we request that you grant this institution a waiver from the applicable provision of the 1987 CREA that would (1) not require us to treat pregnancy/maternity like any other temporary disability, and (2) permit us the option of offering pregnancy/maternity insurance benefits at an additional cost premium.

Enclosed are the current catalogs for both our College and Seminary. If you need additional information in evaluating our request for waiver, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in cursive script that reads "Harry E. Fletcher".

Harry E. Fletcher, D. Min.
President

HEF/mm

Enclosures

cc: Dr. Robert A. Smallwood
Regional Civil Rights Director