



April 22, 2015

Assistant Secretary Catherine Lhamon
U.S. Department of Education
Office for Civil Rights
400 Maryland Avenue, SW
Washington, D.C. 20202-1100

Request for Title IX Religious Exemption.

Dear Assistant Secretary Lhamon:

As the highest-ranking official of Louisiana College, a private, Christian liberal arts college in Louisiana, I hereby request exemption from compliance with certain Title IX regulations, under the religious exemption provided in 20 CFR 1681(a)(3). The particular regulations for exemptions requested are:

- 34 CFR §106.21(b1)(iii) – admissions; regarding prohibitions on the basis of sex
- 34 CFR §106.21(c) – admissions; regarding prohibitions based on marital and parental status
- 34 CFR §106.31(b)(4) – regarding different rules of behavior, sanctions, or other treatment
- 34 CFR §106.57 – pregnancy; regarding marital or parental status of employees
- 34 CFR §106.40 – pregnancy; regarding marital or parental status of students
- 34 CFR §§106.51(a) and 106.51(b)(6) – regarding discrimination in employment in leaves for pregnancy, childbirth, and termination of pregnancy, based on sex, including in regard to gender identity issues
- 34 CFR §106.32 – regarding housing
- 34 CFR §106.33 – regarding restrooms and locker rooms
- 34 CFR §106.41 – regarding athletics

Founded in 1906, Louisiana College is located in Pineville, Louisiana, and is the only Baptist college affiliated with the Louisiana Baptist Convention. The college is guided by the following mission statement:

The mission of Louisiana College is to provide liberal arts, professional, and graduate programs characterized by devotion to the preeminence of the Lord Jesus, allegiance to the authority of the Holy Scriptures, dedication to academic excellence for the glory of God, and commitment to change the world for Christ by the power of the Holy Spirit.

The mission statement summarizes the integration of the Christian faith through Louisiana College's core curriculum as taught to the approximately 1,200 students enrolled in the school.¹

Our **Institutional Goals** are:

- Louisiana College seeks to allow willing faculty, staff, students, and friends to use their God-given talents and skills in promoting the preeminence of Jesus Christ on the college campus.
- Louisiana College seeks to share the institution's belief in the preeminence of Jesus Christ by providing for general community, convention, and campus enjoyment events, which further the institution's accomplishment of this aspect of the mission.
- Louisiana College will enable students to develop a biblical worldview to engage the culture for Christ.
- Louisiana College will help students to apply their biblical worldview in their perspective disciplines of study.
- Louisiana College seeks to provide academic programs, which qualitatively meet or exceed comparable programs offered by peer institutions in areas of: faculty terminal degree percentage, retention rate, and graduation rate.
- Louisiana College provides academically excellent programs of study characterized by highly trained faculty members, measurable achievement of learning outcomes, and graduates working within their chosen field.
- Students who matriculate at Louisiana College will nurture a commitment to change the world for Christ by the power of the Holy Spirit.
- Louisiana College alumni will express a commitment to change the world for Christ by the power of the Holy Spirit.

The college is governed and controlled by its Board of Trustees, which consists of thirty-three members, who are elected by the Louisiana Baptist Convention as indicated in the Louisiana College Articles of Incorporation. These elected members of the Board are members in good standing of a Baptist church in Louisiana cooperating with the Louisiana Baptist Convention and a resident of the state of Louisiana. The President and Executive Director of the Louisiana Baptist Convention and the President of Louisiana College also serve as trustees.

¹ For the college's statement of faith, see *The Baptist Faith and Message (BF&M)*. For Scripture references in the mission statement concerning the Preeminence of Christ, see Rom. 10:9; Col. 2:3; Jn. 14:6, 18:37, and 21:17; Matt. 22:37. For Scripture references in the mission statement concerning the authority of the Holy Scriptures, see *BF&M*, Exod. 24:4; Deut. 4:1-2; 17:19; Josh. 8:34; Psa. 19:7-10; 119:11,89,105,140; Isa. 34:16; 40:8; Jer. 15:16; 36:1-32; Matt. 5:17-18; 22:29; Lk. 21:33; 24:44-46; Jn. 5:39; 16:13-15; 17:17; Acts 2:16ff.; 17:11; Rom. 15:4; 16:25-26; 2 Tim. 3:15-17; Heb. 1:1-2; 4:12; 1 Pt. 1:25; 2 Pt. 1:19-21; For Scriptures referencing academic excellence, see Col. 3:17, 23; Eph. 3:20; 1 Cor. 1:24-25; 2 Cor. 12:9-10. For Scripture referencing changing the world for Christ, see Matt. 28:19-20.

The Administrative Council has identified the following five core values that naturally emanate from the mission statement and are vitally important to the identity of Louisiana College: (1) Accessibility, (2) Continuous Improvement, (3) Honesty and Integrity, (4) Quality, and (5) Transparency. These core values are held in high regard as they pertain to a vertical relationship with God as Creator, Redeemer, and Sustainer of life. They relate in a horizontal relationship as administration, faculty, staff, and students interact with God through the person of Jesus Christ through the empowerment of His Holy Spirit and with each other and in the broader context of the community.

The college follows biblical principles in its policies and practices applicable to Christian education, and to its students and employees. Louisiana College holds the following beliefs:

- **Scripture.** 2 Tim. 3:16 "All Scripture is given by inspiration of God and is profitable for doctrine, for reproof, for correction, for instruction in righteousness." The Bible is the inerrant and infallible record of God's revelation to humanity, and it is the only sufficient source of appeal on matters relating to the Christian faith.
- **God.** Gen. 1:1 "In the beginning, God created the heavens and the earth" reveals God as Creator of the universe. The historical account of Genesis decrees that He is the personal and direct Creator of all that exists, including the first human beings Adam and Eve. Jn. 1:3 "All things were made by him; and without him was not anything made that was made," reveals that as Creator, God made everything for His ultimate glory. There is one and only one living and true God. To Him we owe the highest love, reverence, and obedience.
- **Jesus Christ.** Jn. 14:6 "Jesus saith unto them, I am the way, the truth, and the life: no man cometh unto the Father, but by me." God made provision through Christ for the redemption of sinful humanity by His substitutionary atonement on the cross and His glorious resurrection from the dead, and He alone is sufficient as Savior.
- **Salvation.** Jn. 3:16 "For God so loved the world, that he gave his only begotten Son, that whosoever believeth in him should not perish, but have everlasting life." Salvation involves God's gracious redemption of individuals and is offered freely to all who accept Jesus Christ as personal Lord and Savior by repentance and faith.
- **Life of the Believer.** Rom. 12:2 "And do not be conformed to this world, but be transformed by the renewing of your mind, that you may prove what is that good and acceptable and perfect will of God." Christians are to be consistent with Scripture in their character and conduct.
- **Evangelism and Missions.** Acts 1:8 "But ye shall receive power, after that the Holy Ghost is come upon you; and ye shall be witnesses unto me both in Jerusalem, and in all Judea, and in Samaria, and unto the uttermost part of the earth." It is the privilege and duty of every Christian to share the Gospel of Christ personally and by all other methods in harmony with the Gospel.

Because of our commitment to the Holy Scriptures, Louisiana College implements Faith Integration on campus to students and employees in a number of ways:

- **Chapel.** Our corporate integration starts with our chapel. The purpose of LC chapel is to provide the college with a corporate worship experience connecting the campus community with the thoughts and heart of Jesus Christ, creating a generation to live for HIS Name. Ten chapel requirements must be met during a student's tenure each semester for graduation.
- **Faith Integration for Faculty.** Each year, a facilitator leads staff and faculty through one workshop designed to encourage and equip employees with the knowledge and application of how to integrate faith in the workplace. Intentionality on purpose and praxis are highlighted.
- **Faith Integration for Students.** All students, including non-traditional, are required to complete the following courses: College Connection (CC100), Introduction to Natural Science: Environmental Studies (ES103), Survey of British Literature (EN200), Survey of American Literature (EN201), Civilization I (HI101), Civilization II (HI102), Survey of the Old Testament (RL101), Survey of the New Testament (RL102), and either Christian Faith and Values-Religion (RL300) or Christian Faith and Values-Philosophy (PI300) during their time as a student. Additionally, students must take the Belief Assessment of Spiritual Essentials (BASE) exam three times. The student will take the BASE exam for the first time when entering the college in the course College Connection (CC100). The student will take the BASE exam for the second time when he/she enters either RL300 or PI300, and then finally take the exam at the conclusion of the Christian Faith and Values-Religion (RL300) or Christian Faith and Values-Philosophy (PI300) course.
- **Campus Ministries.** Louisiana College intentionally provides a network of resources to connect students with opportunities to serve the local community, to minister throughout the United States and even to be a part of international missions. To allow students the opportunity to grow in the Holy Word of God, we have organized ministries that lead small groups, worship services and provide access to spiritual growth through residence life, commuter Bible studies, and conferences.

Regarding human sexuality, the teachings of the Bible and the beliefs of the Baptist Church, both of which are followed by the college, are that God created two sexes, male and female; that marriage is between one man and one woman for a lifetime; and that extramarital sex, premarital sex, and the practice of homosexuality are sinful behaviors, and therefore prohibited. (Gen. 2:27; Exod. 22:16-17; Deut. 22:23-28; Lev. 20:10-16.)

Louisiana College affirms that a person cannot change his/her birth gender and so must be treated as such; rather than a self-identified gender, which would be inconsistent with the college's religious beliefs. Furthermore, our affiliation with The Southern Baptist Convention, via Louisiana Baptist Convention, confirms Louisiana College's core beliefs in alignment with the National Convention. Notwithstanding, we agree and support the Southern Baptist Convention's statement on transgender, which, in summary, is as follows:

- We “affirm God’s good design that gender identity is determined by biological sex and not by one’s self-perception—a perception which is often influenced by fallen human nature in ways contrary to God’s design (Eph. 4:17-18)....
- That we grieve the reality of human depravity, which can result in such biological manifestations as intersexuality or psychological manifestations as gender identity confusion and point all to the hope of the redemption of our bodies in Christ (Rom. 8:23)....
- That we extend love and compassion to those whose sexual self-understanding is shaped by a distressing conflict between their biological sex and their gender identity....
- That we invite all transgender persons to trust in Christ and to experience renewal in the Gospel (1 Tim. 1:15-16)....”

Application within the context of the student culture at Louisiana College, guided by the understanding of the scriptures, soul-competency and support of The Southern Baptist Convention’s biblical position, is clearly outlined in the Student Handbook.

- **Biblical Design for Human Sexuality.** We believe that all people should be treated with dignity, grace, and holy love, whatever their sexual beliefs.
 - Sexuality is one of the ways by which the marriage covenant between a husband and a wife is sealed and expressed. Marriage is God’s unique gift to reveal the union between Christ and His church and to provide for the man and the woman in marriage the framework for intimate companionship, the channel of sexual expression according to biblical standards, and the means for procreation of the human race. It is important to note that Christian teaching on marriage and sexuality is in the narrative of all Scripture – from Genesis to Revelation. Marriage, gender and sexuality aren’t just appendages tacked onto Scripture, but are icons of the Gospel and human flourishing (Matt. 19:4-6; Eph. 5:22-33; Heb. 13:4).
 - Sexual union and activity misses their purpose when treated as an end in itself or when cheapened by using another person to satisfy pornographic and sinful sexual interests. We view all forms of sexual intimacy that occur outside the covenant of heterosexual marriage, even when consensual, as distortions of the holiness and beauty that God intended for it.
- **Sexual Impropriety.** Premarital or extramarital sexual activity on or off campus is forbidden. The promotion, advocacy, defense or ongoing practice of a homosexual lifestyle (including same-sex dating behaviors) is also contrary to our community values. We seek to help students who face all types of sexual temptation, encouraging single students to live chaste, celibate lives, and encouraging married students to be faithful to their marriage and their spouse.

Therefore, in accordance with the college's non-faculty and faculty handbook, employees are expected to conduct themselves in a manner consistent with Louisiana College's Christian values. As such, employment of someone who identifies as being of the opposite sex from their birth gender and who expresses that identification either through behavior and/or dress is against the college's religious beliefs. Therefore, the college requests an exemption from 34 CFR §106.31(b)(4) and 34 CFR § 106.51(a).

The college's religious beliefs prohibit pre-marital sex and elective abortion. An exemption from CFR § 106.57 is therefore requested in order that the College not be required to violate its religious beliefs in order to retain pregnant unmarried employees or employees who elect to terminate their pregnancy.

If students and/or employees exhibit behavior, which is not in keeping with the College's mission and vision, then the College may impose sanctions up to, and including, expulsion from the college or termination of employment.

Enforcing the above noted regulations would be consistent with the religious beliefs and practices of the Louisiana Baptist Convention and Louisiana College. As such, and in keeping with its religious beliefs, Louisiana College requests an exemption for the specific Title IX regulations referenced in this letter in order that the College may make decisions consistent with its religious beliefs and principles in regard to its students and employees.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Rick Brewer, Ph.D.
President

Ens.
LC's Articles of Incorporation



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE FOR CIVIL RIGHTS

THE ASSISTANT SECRETARY

July 31, 2015

Dr. Rick Brewer
President
Louisiana College
1140 College Drive
Box 583
Pineville, LA 71359

Dear President Brewer:

I write to respond to your July 17, 2015, letter to the U.S. Department of Education, Office for Civil Rights (OCR), in which you requested a religious exemption for Louisiana College (College) of Pineville, Louisiana, from Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681. Title IX prohibits discrimination on the basis of sex in any education program or activity operated by a recipient of Federal financial assistance.

The implementing regulation at 34 C.F.R. § 106.12 provides that Title IX does not apply to an educational institution controlled by a religious organization to the extent that application of Title IX would be inconsistent with the controlling organization's religious tenets. Therefore, such educational institutions are allowed to request an exemption from Title IX by identifying the provisions of Title IX that conflict with a specific tenet of the religious organization. The request must identify the religious organization that controls the educational institution and specify the tenets of that organization and the provisions of the law or regulation that conflict with those tenets.

Your request explained that the College is "affiliated with the Louisiana Baptist Convention." According to your letter, the College's Articles of Incorporation provide that "[t]he college is governed and controlled by its Board of Trustees, which consists of thirty-three members, who are elected by the Louisiana Baptist Convention . . . These elected members of the Board are members in good standing of a Baptist church in Louisiana cooperating with the Louisiana Baptist Convention." Your letter also states that "[t]he college follows biblical principles in its policies and practices applicable to Christian education, and to its students and employees."

Your letter requests an exemption from the provisions of Title IX to the extent they prohibit discrimination based on marital status, sex outside of marriage, sexual orientation, gender identity, pregnancy, or abortion so that the College "may make decisions consistent with its religious beliefs and principles in regard to its students and employees." In support of this

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

request, you state that the College follows the “teachings of the Bible and the beliefs of the Baptist Church” and refer to The Baptist Faith and Message as the College’s statement of faith. According to your request, these teachings and beliefs provide “that God created two sexes, male and female; that marriage is between one man and one woman for a lifetime; and that extramarital sex, premarital sex, and the practice of homosexuality are sinful behaviors, and therefore prohibited.” Your letter explains that “employees are expected to conduct themselves in a manner consistent with Louisiana College’s Christian values. As such, employment of someone who identifies as being of the opposite sex from their birth gender and who expresses that identification . . . is against the college’s religious beliefs.” Your letter further explains that “[t]he college’s religious beliefs prohibit pre-marital sex and elective abortion.” Finally, your letter states that “if students and/or employees exhibit behavior, which is not in keeping with the College’s mission and vision, then the College may impose sanctions up to, and including, expulsion from the college or termination of employment.”

You state that, for these reasons, the College is requesting an exemption from the following regulatory provisions so that “the College may make decisions consistent with its religious beliefs and principles in regard to its students and employees:”

- 34 C.F.R. § 106.21(b)(1)(iii) (governing admission);
- 34 C.F.R. § 106.21(c) (governing admission);
- 34 C.F.R. § 106.31(b)(4) (governing different rules of behavior or sanctions);
- 34 C.F.R. § 106.32 (governing housing);
- 34 C.F.R. § 106.33 (governing comparable facilities such as restrooms and locker rooms);
- 34 C.F.R. § 106.40 (governing different rules based on marital or parental status of students);
- 34 C.F.R. § 106.41 (governing athletics);
- 34 C.F.R. § 106.51(a) (governing employment);
- 34 C.F.R. § 106.51(b)(6) (governing employment); and
- 34 C.F.R. § 106.57 (governing the consideration of marital or parental status in employment decisions).

The College is exempt from these provisions to the extent that they prohibit discrimination on the basis of marital status, sex outside of marriage, sexual orientation, gender identity, pregnancy, or abortion and compliance would conflict with the controlling organization’s religious tenets.

Please note that this letter should not be construed to grant exemption from the requirements of Title IX and the regulation other than as stated above. In the event that OCR receives a complaint against your institution, we are obligated to determine initially whether the allegations fall within the exemption here granted. Also, in the unlikely event that a complainant alleges that the practices followed by the institution are not based on the religious tenets of the controlling organization, OCR is obligated to contact the controlling organization to verify those tenets. If the organization provides an interpretation of tenets that has a different practical

impact than that described by the institution, or if the organization denies that it controls the institution, this exemption will be rescinded.

I hope this letter responds fully to your request. If you have any questions, please do not hesitate to contact me.

Sincerely,



Catherine E. Lhamon
Assistant Secretary for Civil Rights
U.S. Department of Education



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Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Brewer".

Rick Brewer, Ph.D.
President

Encs.

1. CSU BOT By-Laws