

March 22, 2017

Catherine Lhaman, Assistant Secretary
U.S. Department of Education, Office for Civil Rights
Lyndon Baines Johnson Department of Education Building
400 Maryland Avenue, SW
Washington, DC 20202-1100

Re: Bethany Global University's Request for Title IX Religious Exemption

Dear Ms. Lhamon:

As President of Bethany Global University, a private, Christian missionary training institution, I hereby request, under Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. §1681 and its implementing regulation at 34 C.F.R. §106, an exemption for Bethany Global University from provisions of Title IX to the extent that application of these provisions would not be consistent with the University's religious tenets regarding marriage, premarital sex/pregnancy, sexual orientation, gender identity, & sanctity of human life. I request an exemption from compliance with these provisions of Title IX due to the religious beliefs of our institution.

Bethany Global University is the training ministry of Bethany International (a DBA of Bethany Fellowship, Inc. which registered as a Christian church in 1945.) The church was founded for the purpose of mobilizing disciples of Jesus and the church worldwide for the increase of God's Kingdom.¹ Similarly, Bethany Gateways is the missions sending ministry of Bethany International dedicated to sending missionaries worldwide.²

Bethany Global University's students and ministry personnel, work, live, and learn in an environment where the image of God in each individual is respected and affirmed for the purpose of growth in spiritual maturity, personal responsibility, and knowledge of God, as revealed in His Word and by His Spirit, in order to become effective ministers of the Gospel. In this capacity, as a University dedicated from its inception to training Christian missionaries, exercising religious preference of its ministry personnel and student enrollment in accordance with our Statement of Faith and the historical interpretation of biblical truth is essential to the furtherance of our mission.

In our Statement of Faith, Bethany International and the University express our belief that the Bible is "the only inspired, inerrant, and authoritative Word of God," and as such it "is the final authority concerning truth, morality and the proper conduct of mankind."³ The Bible thus informs the University's belief that human beings, created by God in his own image, are created male and female (Genesis 1:27). In the New Testament, Jesus confirms this heterosexual creation of human beings stating that God "made them male and female"

¹ <https://bethanyinternational.org/about/>

² <https://bethanygu.edu/about/history/>

³ Bethany Global University, Statement of Faith, <https://bethanygu.edu/about/statement-of-faith/>

(Matthew 19:4). Like the rest of God's creation, the sexual differences between man and woman are pronounced "very good" (Genesis 1:31).

This distinction between man and woman is also assumed in our Lifestyle Statement⁴ and our Position Statement on Religious Freedom and Human Sexuality⁵. The statement says that "We uphold the sanctity of marriage as God-ordained, a special union between a man and a woman, within which sexual relations are honored and affirmed by God. We share the conviction that all sexual unions, outside of marriage as thus defined, are sinful." We also affirm the value of human life from conception to natural death, and thus believe that abortion is not part of God's design for human flourishing. Any individual who unrepentantly participates in abortion would also be in violation of our community standards. We recognize these principles may conflict with the practice or opinion of some within the larger culture. However, we are convinced that this is God's design for providing the most loving guidance and practice for individuals and our community.

We affirm the dignity of all human beings. We also separate the value of each person from the behavioral choices one makes. We believe that, as Christians, we are called to treat all people with compassion, and to extend the gospel of repentance, forgiveness, and transformation through Jesus Christ to such persons without reservation. However, in keeping with our biblical beliefs surrounding the morality of such actions, we cannot in good conscience support or encourage an individual to live in conflict with biblical principles. Moreover, any individual who violates campus standards for biblical living is subject to discipline, including expulsion.

Because of our biblical beliefs regarding sanctity of life, gender, and sexual morality, our practices might be deemed a violation of certain provisions of Title IX. However, under 20 U.S.C. §1681 and its implementing regulations 34 C.F.R. §106.12, these provisions do not apply to Bethany Global University: "This part does not apply to an educational institution which is controlled by a religious organization to the extent application of this part would not be consistent with the religious tenets of such organization."

Thus, on behalf of Bethany Global University, I hereby request exemption from compliance with Title IX and the following implementing regulations. These regulations include:

- §106.21 admissions
- §106.22 preference in admissions
- §106.23 recruitment
- §106.31 education programs or activities
- §106.32 housing
- §106.33 comparable facilities
- §106.34 access to classes and schools
- §106.36 counseling
- §106.37 financial assistance

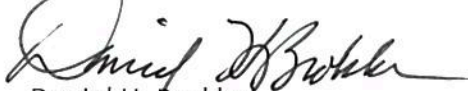
⁴ <https://bethanygu.edu/about/lifestyle-statement/>

⁵ <https://bethanyinternational.org/about/position-statements/>

§106.38 employment assistance to students
§106.39 health & insurance benefits & services
§106.40 marital and parental status
§106.51-61 relating to employment

If you require anything further, please do not hesitate to contact me.

Sincerely,



Daniel H. Brokke,
President
Bethany Global University

Attachments:

Policy 2.13 University Governance
Policy 2.14 Constitution of Bethany Global University
Policy 2.15 Bylaws of Bethany Global University