



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE FOR CIVIL RIGHTS

THE ASSISTANT SECRETARY

December 14, 2017

William Blocker, DMCE  
President  
College of Biblical Studies  
7000 Regency Square Blvd.  
Houston, TX 77036-3211

Dear President Blocker:

I write in response to your August 31, 2016, letter to the U.S. Department of Education's Office for Civil Rights (OCR), in which you requested a religious exemption for the College of Biblical Studies (College) of Houston, Texas, from Title IX of the Educational 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. Title IX and its implementing regulation at 34 C.F.R. § 106.12 provide that Title IX does not apply to an educational institution that is controlled by a religious organization to the extent that the application of Title IX would be inconsistent with the controlling organization's religious tenets. Therefore, such educational institutions may 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. An institution may be considered controlled by a religious organization if it is a school or department of divinity.

Your request letter states that the College's mission is to provide "biblically based education for the Body of Christ." Your letter explains that the College "equips its students with a biblical worldview for Christian service to the church and the world." You state that the College "exists to prepare students to become ministers and to teach theological subjects, in contradistinction to the broader focus of a religious liberal arts college." Your letter also states that the College's religious board of trustees must affirm the College's doctrinal statement and submit themselves to the Bible.

Your letter requests exemption from certain provisions of Title IX and its implementing regulations to the extent that "they are interpreted to curtail the College's freedom to respond to transgender individuals in accordance with its theologically-grounded convictions," "reach sexual orientation discrimination," "curtail the College's freedom to act in accordance with its theological commitments regarding gender roles," or restrict the College's application of its "Statement on Human Life."

In support of this request, your letter cites to the College's Statement on Human Sexuality, which states that "the Bible encourages Christians to understand their sexual orientation and sexual

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