



FAMILY OF FAITH
CHRISTIAN UNIVERSITY

SAMUEL W. MATTHEWS, D. MIN., PRESIDENT

November 8, 2016

Catherine E. Lhamon
Assistant Secretary for Civil Rights
400 Maryland Ave. SW,
Washington D.C. 20202
OCR@ed.gov.

Re: Request for Religious Exemption from Certain Applications of Title IX

Dear Ms. Lhamon:

Family of Faith Christian University (formerly Family of Faith College), of Shawnee, Oklahoma, is requesting, under 20 U.S.C. § 1681 and 34 C.F.R. § 106.12, that this university be exempt from Title IX of the Education Amendments of 1972 and its accompanying regulations. These regulations would prohibit FFCU from its freedom to respond to students and staff in what the institution believes to be a biblical manner consistent with the purposes of the institutional mission. I am the “highest ranking official of the institution,” and am qualified to seek these exemptions.

The regulation provides that Title IX does not apply to an educational institution that is “defined as an institution or a department or branch of an institution whose program is specifically for the education of students to prepare them to become ministers of religion or to enter upon some other religious vocation, or to prepare them to teach theological subjects” or that “requires its faculty, students or employees to be members of, or otherwise espouse a personal belief in, the religion of the organization by which it claims to be controlled.”

Family of Faith Christian University (FFCU) was founded in 1992 with a specific mission and focus:

Family of Faith Christian University was founded by the decree of the Holy Spirit for the purpose of educating, discipling, and training laborers for the Kingdom of God. The university equips students, or laborers, spiritually, academically, and practically to accomplish the Great Commission through effective service in churches, Christian schools, and businesses. The university exists to provide higher education and training in the unique environment of the New Testament pattern of church government. This government and oversight, both in churches and in the college, is provided by apostles, prophets, evangelists, pastors, and teachers working as members of teams bound together in deep covenant relationships.

P.O. Box 1805 | Shawnee, OK, 74802 | (405) 695-5533
smatthews@familyoffaithcollege.edu

FFCU offers academic programs that are specifically designed to prepare students to be pastors and teachers in Christian vocation. Each degree program requires substantial completion of courses that deal with Bible and theology. This institution does require faculty, applicants, students and other employees to subscribe to the FFCU Statement of Faith which is biblically based in every way. Faculty and staff contracts specifically request that the “instructor affirms that, as part of the qualifications for this position, he or she is a “born again” Christian who knows the Lord Jesus Christ as Savior.”

Furthermore, students must agree to the College Covenant (attached), which deals with behavioral expectations. This Covenant includes the following specific statement regarding marriage and sexual relationships outside of marriage.

4. I will keep my body pure before the Lord, practice good health habits, and regularly participate in wholesome physical activities. (Rom. 1:21-32, 12:1; 1 Cor. 3:16-17, 6:13-7:9; 2 Cor. 12:21; Gal. 5:19-26; Col. 3:3-6; 1 Thes. 4:3-8)

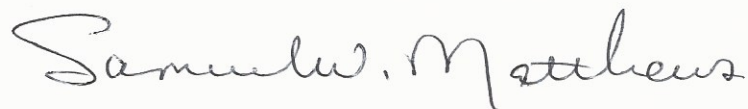
One is expected to abstain from alcohol, tobacco, illegal drugs, and sexual immorality. The college has specific policies on maintaining an alcohol and drug free campus (available in the College Policy Manual and Academic Catalog). Marriage is a covenant between a man and a woman who are obeying God's direction to become one to fulfill His calling. Sexual relationships outside a marriage are wrong. Furthermore, one should eat well, exercise, and cultivate cleanliness, neatness, and strength into their daily lives.

We are specifically requesting exemption from the following regulatory provisions to the extent that they prohibit discrimination based on marital status, sex outside of marriage, sexual orientation, gender identity, and pregnancy. Compliance would conflict with the religious beliefs of this university.

- 34 C.F.R. § 106.21 Admission.
- 34 C.F.R. § 106.22 Preference in admission.
- 34 C.F.R. § 106.23 Recruitment.
- 34 C.F.R. § 106.31 Education programs or activities.
- 34 C.F.R. § 106.32 Housing.
- 34 C.F.R. § 106.33 Comparable facilities.
- 34 C.F.R. § 106.34 Access to classes and schools.
- 34 C.F.R. § 106.35 Access to institutions of vocational education.
- 34 C.F.R. § 106.36 Counseling and use of appraisal and counseling materials.
- 34 C.F.R. § 106.37 Financial assistance.
- 34 C.F.R. § 106.38 Employment assistance to students.
- 34 C.F.R. § 106.39 Health and insurance benefits and services.
- 34 C.F.R. § 106.40 Marital or parental status.
- 34 C.F.R. § 106.41 Athletics.
- 34 C.F.R. § 106.42 Textbooks and curricular material.
- 34 C.F.R. § 106.43 Standards for measuring skill or progress in physical education classes.
- 34 C.F.R. § 106.51 Employment.
- 34 C.F.R. § 106.52 Employment criteria.
- 34 C.F.R. § 106.53 Recruitment.
- 34 C.F.R. § 106.54 Compensation.
- 34 C.F.R. § 106.55 Job classification and structure.
- 34 C.F.R. § 106.56 Fringe benefits.
- 34 C.F.R. § 106.57 Marital or parental status.
- 34 C.F.R. § 106.58 Effect of State or local law or other requirements.
- 34 C.F.R. § 106.59 Advertising.
- 34 C.F.R. § 106.60 Pre-employment inquiries.

For your review, we have attached copies of our degree programs, our Statement of Faith, our College Covenant, and our faculty contracts.

Sincerely yours,

A handwritten signature in cursive script that reads "Samuel W. Matthews". The signature is written in black ink and is positioned above the typed name and title.

Samuel W. Matthews, D.Min.
President, Family of Faith Christian University