

**DISCLOSURE OF EXEMPTIONS TO  
FEDERAL TITLE IX – EQUAL OPPORTUNITY IN EDUCATION ACT  
CALIFORNIA EQUITY IN HIGHER EDUCATION ACT**

Education Code section 66290.2(a)(1) requires each postsecondary educational institution in this state that claims an exemption under Section 901(a)(3) of the federal Title IX of the Education Amendments of 1972 (20 U.S.C. Sec. 1681(a)(3)) [Equal Opportunity in Education Act], to submit to the Student Aid Commission copies of all materials submitted to, and received from, a state or federal agency concerning the granting of the exemption.

Section 901(a)(3) of Title IX provides:

**(a)** Prohibition against discrimination; exceptions. No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance, except that:

\* \* \*

**(3)** Educational institutions of religious organizations with contrary religious tenets. this section shall not apply to an educational institution which is controlled by a religious organization if the application of this subsection would not be consistent with the religious tenets of such organization;

\* \* \*

Education Code section 66290.2(a)(2) requires each postsecondary educational institution in this state not described in the previous paragraph, that has an exemption pursuant to Education Code Section 66271, to submit to the Student Aid Commission its basis for having the exemption.

Education Code section 66271 provides:

This chapter [Equity in Higher Education Act] shall not apply to an educational institution that is controlled by a religious organization if the application would not be consistent with the religious tenets of that organization.

The institutions that have made submissions to the Commission under Education Code Section 66290.2 are listed below. Copies of the submissions are also provided.

<b>Count</b>	<b>School Code</b>	<b>School Name</b>	<b>EHE</b>	<b>Title IX</b>
1	00111700	Azusa Pacific University	X	
2	00112200	Biola University	X	X
3	00112500	California Baptist University	X	
4	02070500	Concordia University	X	
5	00125300	Fresno Pacific University	X	X
6	00125200	Hope International University	X	
7	04193700	John Paul the Great Catholic University	X	X
8	00121500	La Sierra University	X	
9	02270600	Life Pacific College	X	X
10	00121800	Loma Linda University	X	
11	00125800	Pacific Union College	X	X
12	01014900	Pepperdine University	X	
13	04153900	Providence Christian College	X	
14	01203100	San Diego Christian College	X	
15	00129100	Simpson University	X	X
16	00122000	The Master's University	X	X
17	02358000	Thomas Aquinas College	X	
18	00123900	Vanguard University of Southern California	X	X
19	00134100	Westmont College	X	
20	00128100	William Jessup University	X	X



October 9, 2017

Lupita Cortez Alcalá  
California Student Aid Commission  
PO Box 419026  
Rancho Cordova, CA 95741-9026

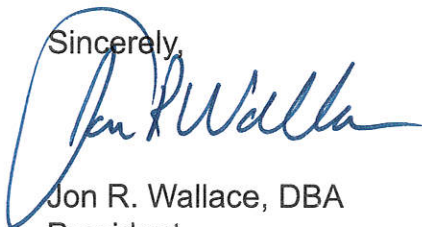
Dear Ms. Alcalá,

Since the university's founding in 1899, APU has incorporated our religious beliefs into every aspect of university life. At Azusa Pacific, those who live and learn together form the fabric of our Christ-centered university community. Shared values, mutual respect, and hospitality are cherished attributes that each member contributes to and works hard to safeguard. We do not take this responsibility lightly and remain grateful to be part of the educational plurality of the great state of California. Faith integration, student care, service, diversity, and religious expression combine to form the essence of our mission-driven community.

This letter is submitted by Azusa Pacific University and Azusa Pacific University, University College, with reference to California Education Code section 66290.2(a)(1) and (2). With respect to subsection (a)(1), neither institution has submitted or received documents concerning the granting of an exemption pursuant to Section 901(a)(3) of the federal Title IX of the Education Amendments of 1972 (20 U.S.C. Sec. 1681(a)(3) to any state or federal agency. With respect to subsection (a)(2), we are enclosing a copy of the brochure entitled *A Faith and Learning Community*, which can also be accessed on our website at [apu.edu/about/faithandlearning/](http://apu.edu/about/faithandlearning/). This submission is made without waiving any argument that Ed. Code section 66290.2 is unconstitutional and unenforceable.

Please let me know if you require additional information.

Sincerely,



Jon R. Wallace, DBA  
President

OFFICE OF THE PRESIDENT

BARRY H. COREY



July 19, 2017

California Student Aid Commission  
Lupita Cortez Alcalá, Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

**Re: California Education Code 66290.2(a) Submission**

To the California Student Aid Commission:

Pursuant to California Education Code 66290.2(a)(1), Biola University, Inc. (“Biola”) is hereby submitting all documentation with regard to Biola’s exemption under the Title IX statute and its implementing regulations at 34 C.F.R. §106.12. Title IX does not apply to an educational institution that is controlled by a religious organization to the extent that application of Title IX would be inconsistent with the religious tenets of the organization. Per the enclosed documentation, Biola has claimed and been granted an exemption.

In addition, Biola is committed to providing a learning and living environment that promotes safety, transparency, personal integrity, civility, mutual respect and freedom from discrimination. As a Christian university controlled by a religious organization, Biola is also exempted from provisions of California Education Code 66270 to the extent that the application of such laws is not consistent with the institution’s religious tenets. These exemptions may apply to, but are not limited to, requirements as expressed in university policies including the following: undergraduate student community standards (<https://studenthub.biola.edu/undergraduate-student-handbook>), graduate community standards (<https://studenthub.biola.edu/biola-community-standards>), housing policies (<https://studenthub.biola.edu/housing-handbook>), admissions processes (<https://www.biola.edu/undergrad/admissions#process>) and employee standards of conduct (<http://offices.biola.edu/hr/ehandbook/3.1/>). Biola retains all rights afforded under federal law and the laws of the State of California.

Sincerely,

A handwritten signature in black ink, appearing to read "BHC", is written over the typed name.

Barry H. Corey  
President

☎ 951.689.5771

☎ 951.351.1808

🌐 calbaptist.edu

November 14, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2.

To the California Student Aid Commission:

California Baptist University's disclosure pursuant to CEC 66290.2, is set forth below:

California Baptist University, an educational institution controlled by the California Southern Baptist Convention, takes seriously anti-discrimination provisions under state law and is committed to providing a learning and living environment that promotes student safety, transparency, personal integrity, civility, and mutual respect.

California Baptist University is exempted by the state from California Education Code 66270 to the extent the application of California Education Code 66270 is not consistent with the institution's religious tenets. California Baptist University retains all rights afforded it under federal law and the laws of the State of California.

Sincerely,



Ronald L. Ellis, Ph.D.  
President



**CONCORDIA**  
UNIVERSITY IRVINE

OFFICE OF THE  
GENERAL COUNSEL

August 28, 2017

California Student Aid Commission  
Attn: Lupita Cortez Alcalá, Executive Director  
11040 White Rock Road  
Rancho Cordova, CA 95670

Re: Education Code Section 66290.2(a)(2) notification of basis for  
having the exemption provided by Education Code Section 66271

Dear Lupita Cortez Alcalá:

We are providing this notification to the California Student Aid Commission as required by Education Code Section 66290.2(a)(2).

Concordia University Irvine is an educational institution controlled by the Lutheran Church – Missouri Synod that takes seriously anti-discrimination provisions under federal and state law, and is committed to providing a learning and living environment that promotes student safety, transparency, personal integrity, civility and mutual respect.

Concordia University Irvine does not discriminate on the basis of disability, age, race, color, gender, gender-identity, sexual orientation, national and ethnic origin or any other protected class in administration of its educational policies, admissions policies, scholarships and loan programs, athletic programs or any other university-administered programs, except to the extent that religious freedom exemptions apply.

Concordia University Irvine has not applied for the regulatory exemption under Title IX, 34 C.F.R. section 106.12, but the Title IX statutory exemption provided by Congress, see 20 U.S.C. section 1681(a)(3), is self-executing. As an educational institution that is controlled by a religious organization, Concordia University Irvine is entitled to that statutory exemption to the extent the application of Title IX is not consistent with the institution's religious tenets.

Concordia University Irvine is exempted by the state from California Education Code 66270, to the extent the application of California Education Code 66270 is not consistent with the institution's religious tenets. The exemption may apply to,

California Student Aid Commission

August 28, 2017

Page 2

but is not limited to, requirements as expressed in University policies, including policies found in the Student Code of Conduct, the Housing Handbook, the Student Handbook, the Student-Athlete Handbook, the Employee Handbook and the Employee Student Handbook. Concordia University Irvine retains all rights afforded to us under federal law and the laws of the State of California.

Please do not hesitate to contact me, if you have any questions about this communication.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "R. Van Blarcom", with a long horizontal line extending to the right.

Ronald A. Van Blarcom  
General Counsel  
Concordia University Irvine



October 4, 2017

California Student Aid Commission  
Lupita Cortez Alcala  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

**Re: Disclosure requirement pursuant to CEC 66290.2**

To the California Student Aid Commission:

Fresno Pacific University is an educational institution that is controlled by the Pacific District Conference of Mennonite Brethren Churches. Consistent with its Christian beliefs, the University takes seriously anti-discrimination provisions under federal and state law, and is committed to providing a learning and living environment that promotes safety, transparency, personal integrity, civility, and mutual respect. The University is exempt under Title IX of the Education Amendments of 1972, 34 C.F.R. section 106.12, and from provisions of California Education Code 66270 to the extent that the application of these provisions is inconsistent with its religious tenets. These exemptions may apply to, but are not limited to, requirements in the University's community standards, employment policies, housing policies, admissions and recruitment processes, benefits and services, financial assistance, and its academic programs, including student leadership, athletic, and arts programs. Attached are copies of materials submitted to and received from the U.S. Department of Education concerning the University's exemption under Title IX.

The University retains all rights afforded to it under federal law and the laws of the State of California.

Signed, 





November 16, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P. O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2

To the California Student Aid Commission:

Hope International University is an educational institution that serves a religious organization, the Churches of Christ and Christian Churches that takes seriously anti-discrimination provisions under federal and state law, and is committed to providing a learning and living environment that promotes safety, transparency, personal integrity, civility and mutual respect. Hope International University is also exempted by the state from California Education Code 66270 to the extent the application of California Education Code 66270 is not consistent with our institution's religious tenets.

The exemption may apply to, but is not limited to, requirements as expressed in our University policies, including our University mission statement, catalog, student handbook, faculty handbook, staff handbook, University website, Admissions applications and written materials sent to prospective students, student, faculty and staff orientation materials, Housing policies, and all other publications that set forth the comprehensive rules, regulations, procedures, and standards of conduct for our institution. We retain all rights afforded to us under federal law and the laws of the State of California.

Hope International University has not applied for the regulatory exemption under Title IX, 34 C.F.R., section 106.12, but the Title IX statutory exemption provided by Congress, see 20 U.S.C section 1681(a)(3), is self-executing. As an educational institution that serves a religious organization, Hope International University is entitled to that statutory exemption to the extent the application of Title IX is not consistent with the institution's religious tenets.

Sincerely,

Dr. John L. Derry  
President



**JOHN PAUL  
THE GREAT**  
CATHOLIC UNIVERSITY

---

November 14, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2

To the California Student Aid Commission:

Pursuant to California Education Code 66290.2 (a) (1), John Paul the Great Catholic University is hereby submitting all documentation with regard to John Paul the Great Catholic University's exemption under the Title IX statute and its implementing regulation at 34 C.F.R. § 106.12. Title IX does not apply to an educational institution that is controlled by a religious organization to the extent that application of Title IX would be inconsistent with the religious tenets of the organization. Per the enclosed documentation, John Paul the Great Catholic University has claimed and been granted an exemption.

Signed,

Derry Connolly, Ph.D.  
President  
John Paul the Great Catholic University  
220 W Grand Ave  
Escondido, CA 92025



November 15, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2.

To the California Student Aid Commission:

La Sierra University is committed to inquiry, learning, and service. Consistent with the life and teachings of Jesus Christ and our belief in a God of grace and redeeming love, the University maintains a safe and civil campus environment that promotes diversity, service and equal dignity and respect for all persons.

La Sierra University is part of the higher education system of the Seventh-day Adventist Church. The University's heritage and ethos reflects a dedication of loving service to people of all backgrounds and identities. La Sierra University is committed to creating and fostering an educational environment where all members of its community can thrive. Faith and learning are integrated in the curriculum and in student activities, and religious beliefs and tenets are woven into all aspects of institutional operations. This places the University within the educational plurality of the State of California.

The freedom to practice and express the University's religious beliefs and tenets is recognized by the United States and California Constitutions. Other federal and state laws likewise support the opportunity for religious higher education institutions such as La Sierra University to pursue their missions and integrate religious beliefs and tenets into campus life. For example, exemptions in Title IX<sup>1</sup> and the California Equity in Higher Education Act<sup>2</sup> support the University's efforts to operate consistently with its religious beliefs and tenets by maintaining faith-based standards of behavior that all students, faculty and employees agree to follow as a condition of participation in our learning community. Those standards may be found at the following on-line documents—Faculty Handbook, Employee Salary and Hourly Handbooks, and Student Handbook.

Notwithstanding the permitted exemptions, and consistent with its commitments to diversity and service, La Sierra University seeks to fully comply with Title IX and does not unlawfully discriminate in

---

<sup>1</sup> 20 United States Code Sec 1681(a)(3); 34 Code of Federal Regulations Sec. 106.12

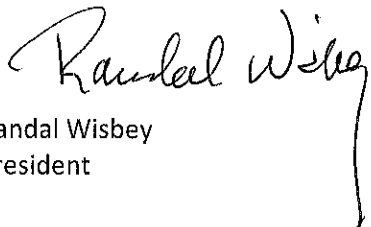
<sup>2</sup> California Education Code Sec. 66270

*Office of the President*  
4500 Riverwalk Parkway  
Riverside, CA 92515-8247  
P 951.785.2020  
F 951.785.2019  
www.lasierra.edu  
president@lasierra.edu

student admissions or employment on the basis of gender identity, sexual orientation, marital status, race, color, national origin, ethnicity, religion, age (over 40), disability, or veteran status.

Links to this disclosure statement and the policy handbooks can be found on the university's website at <https://lasierra.edu/about/>.

Sincerely,

A handwritten signature in cursive script that reads "Randal Wisbey". The signature is written in black ink and is positioned to the right of the typed name and title.

Randal Wisbey  
President



**LIFE PACIFIC**  
COLLEGE TO UNIVERSITY

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2.

To the California Student Aid Commission:

Life Pacific College is a Christ-centered learning community that exists for the transformational development of students into leaders prepared to serve God in the Church, the workplace, and the world. Our identity as a Christian institution within the Foursquare tradition, characterized by a diverse community of Spirit-empowered students, scholars, and practitioners whose hearts and minds are devoted to Christ and His Kingdom, is central to all that we do and teach.

As a Christian institution, we affirm the divine creation of humanity in the image of God (Gen. 1:26-27). The image is shared by all humans equally and, therefore, all individuals are equally valuable. We do not tolerate any form of illegal discrimination or harassment and are committed to providing a learning and living environment that promotes dignity, student safety, transparency, personal integrity, civility, and mutual respect.

While the college does not exclude students from attendance or limit educational activities based solely on sexual orientation or gender identity, we do maintain policies and practices consistent with our biblical beliefs regarding gender and human sexuality. Therefore, LPC has applied for the regulatory exemption under Title IX, 34 C.F.R. section 106.12. Our request may be found at the following link:

<https://www2.ed.gov/about/offices/list/ocr/docs/t9-rel-exempt/life-pacific-college-request-11022016.pdf>.

Furthermore, LPC is also exempted by the state from California Education Code 66270, to the extent the application of California Education Code 66270 is not consistent with the institution's religious tenets.

Signed,

Jim J. Adams, Ed.D.  
President  
Life Pacific College



LOMA LINDA UNIVERSITY  
HEALTH

November 17, 2017

**VIA EMAIL & US MAIL**

[jo.dunlap@csac.ca.go](mailto:jo.dunlap@csac.ca.go)

Attn: Lupita Cortez Alcalá  
California Student Aid Commission  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-90287

**Re: Submission or Required Disclosures Under SB 1146**

Dear Ms. Alcalá,

We refer to your email of November 13, 2017. Per your request, please find enclosed our Disclosure to the California Student Aid Commission.

Sincerely,

Kent Hansen  
General Counsel

KAH/ja

*A Seventh-day Adventist Organization*

OFFICE OF THE GENERAL COUNSEL

11234 Anderson Street, Post Office Box 2000, Loma Linda, California 92354  
909-558-2644 · fax 909-558-2655 · [www.lluhealth.org](http://www.lluhealth.org)

## FREEDOM OF RELIGIOUS PRACTICE AND EXPRESSION

The mission of Loma Linda University is to continue the teaching and healing ministry of Jesus Christ. Consistent with the life and teachings of Jesus and our belief in a God of healing and redeeming love, the University maintains a safe and civil campus environment that promotes diversity, service and equal dignity and respect for all persons.

Loma Linda University is part of the higher education system of the Seventh-day Adventist Church. The University's heritage and ethos reflect a dedication of loving service to people of all backgrounds and identities. Loma Linda University is committed to creating and fostering an educational environment where all members of its community can thrive. Faith and learning are integrated in the curriculum and in student activities. Religious beliefs and tenets are woven into all aspects of institutional operations. This places the University within the educational plurality of the State of California.

The freedom to practice and express the University's religious beliefs and tenets is recognized by the United States and California Constitutions. Other federal and state laws likewise support the opportunity for religious higher education institutions such as Loma Linda University to pursue their missions and integrate religious beliefs and tenets into campus life. For example, exemptions in Title IX<sup>1</sup> and the California Equity in Higher Education Act<sup>2</sup> support the University's efforts to operate consistently with its religious beliefs and tenets by maintaining faith-based standards of behavior that all students, faculty and employees agree to follow as a condition of participation in our learning and healing community. Those standards may be found at the following on-line sites:

Employee Handbook:

<https://one.lluh.org/sites/one.lluh.org/files/docs/forms/departments/LLUSS-Departments/Human-Resource-Management/Employee-Handbook-LLU.pdf> and

Student Handbook: <http://home.llu.edu/sites/home.llu.edu/files/docs/student-handbook.pdf>

Notwithstanding the permitted exemptions, and consistent with its commitments to diversity and service, Loma Linda University seeks to fully comply with Title IX and does not unlawfully discriminate in student admissions or employment on the basis of gender identity, sexual orientation, marital status, race, color, national origin, ethnicity, religion, age (over 40) disability, or veteran status.

---

<sup>1</sup> 20 United States Code Sec 1681(a)(3); 34 Code of Federal Regulations Sec. 106.12

<sup>2</sup> California Education Code Sec. 66270



November 16, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

To the California Student Aid Commission:

Pacific Union College is committed to inquiry, learning, and service. Consistent with the life and teachings of Jesus Christ and our belief in a God of grace and redeeming love, the College maintains a safe and civil campus environment that promotes diversity, service and equal dignity and respect for all persons.

Pacific Union College is part of the higher education system of the Seventh-day Adventist Church. The College's heritage and ethos reflects a dedication of loving service to people of all backgrounds and identities. Pacific Union College is committed to creating and fostering an educational environment where all members of its community can thrive. Faith and learning are integrated in the curriculum and in student activities, and religious beliefs and tenets are woven into all aspects of institutional operations. This places the College within the educational plurality of the State of California.

The freedom to practice and express the College's religious beliefs and tenets is recognized by the United States and California Constitutions. Other federal and state laws likewise support the opportunity for religious higher education institutions such as Pacific Union College to pursue their missions and integrate religious beliefs and tenets into campus life. For example, exemptions in Title IX and the California Equity in Higher Education Act support the College's efforts to operate consistently with its religious beliefs and tenets by maintaining faith-based standards of behavior that all students, faculty and employees agree to follow as a condition of participation in our learning community. Those standards may be found at the following on-line sites: [https://www.puc.edu/\\_data/assets/pdf\\_file/0007/11869/StatementOfEthics.pdf?v=0.1.4](https://www.puc.edu/_data/assets/pdf_file/0007/11869/StatementOfEthics.pdf?v=0.1.4); [https://www.puc.edu/\\_data/assets/pdf\\_file/0006/10968/PUC-StaffHandbook.pdf?v=0.1.6](https://www.puc.edu/_data/assets/pdf_file/0006/10968/PUC-StaffHandbook.pdf?v=0.1.6); [https://www.puc.edu/\\_data/assets/pdf\\_file/0010/139663/Faculty-Handbook-2017.pdf](https://www.puc.edu/_data/assets/pdf_file/0010/139663/Faculty-Handbook-2017.pdf); [https://www.puc.edu/\\_data/assets/pdf\\_file/0019/13474/PUC-Stdnt-Hndbk.pdf](https://www.puc.edu/_data/assets/pdf_file/0019/13474/PUC-Stdnt-Hndbk.pdf)

Title IX does not apply to an educational institution that is controlled by a religious organization to the extent that application of Title IX would be inconsistent with the religious tenets of the organization. In addition to that general exemption, Pacific Union College has claimed and been granted exemptions by the U.S. Department of Education. Pursuant to California Education



Code 66290.2 (a) (1), Pacific Union College is hereby submitting all documentation with regard to Pacific Union College's exemptions under the Title IX statute and its implementing regulation at 34 C.F.R. § 106.12.

Consistent with its commitments to diversity and service, Pacific Union College seeks to comply with state and federal nondiscrimination laws to the fullest extent possible, subject to its religious exemptions, and it does not unlawfully discriminate in student admissions or employment.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Cushman, Jr.", written in a cursive style.

Robert A. Cushman, Jr., Ph.D.  
President

**PEPPERDINE**  
General Counsel

November 15, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2(a)(2)

To the California Student Aid Commission:

As a Christian University affiliated with the Churches of Christ, Pepperdine treats everyone with the respect and kindness that we have been called to show one another. The University community is a space where lives intersect and knowledge is discovered, which fortifies the strength found in our differences and uncovers the virtues revealed in diversity, unity, and restoration. To that end, Pepperdine is committed to fostering an environment free from discrimination as described in California Education Code Section 66270 and reserves its right to remain a Christian University by favoring co-religionists in its admissions decisions.

Sincerely,



Marc P. Goodman  
General Counsel



August 29, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2.

To the California Student Aid Commission:

Providence Christian College is an educational institution that is committed to providing a learning and living environment that, consistent with its Christian beliefs, promotes student safety, transparency, personal integrity, civility and mutual respect. Providence is a Christian college and is controlled by a religious organization that takes seriously anti-discrimination provisions under federal and state law. Providence is also exempted by the state from California Education Code 66270, to the extent the application of California Education Code 66270 is not consistent with the institution's religious tenets.

This exemption may apply to, but is not limited to, requirements as expressed in College policies including: community standards, employment policies, housing policies, admissions and recruitment processes, benefits and services, financial assistance, and our academic programs, including student leadership, athletic, and arts programs. We retain all rights afforded to us under federal law and the laws of the State of California.

Sincerely,

A handwritten signature in black ink that reads 'Jim Belcher'.

Jim Belcher, PhD  
President

A College Founded on Truth.

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to SB1146

To the California Student Aid Commission:

San Diego Christian College is an educational institution that is controlled by a religious organization that takes seriously anti-discrimination provisions under federal and state law, and is committed to providing a learning and living environment that promotes student safety, transparency, personal integrity, civility and mutual respect. San Diego Christian College is also exempted by the state from California Education Code 66270, to the extent the application of California Education Code 66270 is not consistent with the institution's religious tenets.

The exemption may apply to, but is not limited to, requirements as expressed in College policies including: San Diego Christian College Student Life Handbook – 2017-2018, San Diego Christian College Community Covenant, Employee Handbook, Board of Trustee Manual, and as communicated through the 2016-2017 President's Executive Summary, SDC Viewbook, and SDC Admissions Tri-Fold, all of which are enclosed. We retain all rights afforded to us under federal law and the laws of the State of California.

San Diego Christian College has not applied for the regulatory exemption under Title IX, 34 C.F.R. section 106.12, but the Title IX statutory exemption provided by Congress, see 20 U.S.C. section 1681(a)(3), is self-executing. As an educational institution that is controlled by a religious organization, is entitled to that statutory exemption to the extent the application of Title IX is not consistent with the institution's religious tenets.

Sincerely,



Dr. Paul Ague  
President

Enclosures (7):  
San Diego Christian College Student Life Handbook – 2017-2018  
San Diego Christian College Community Covenant  
Employee Handbook  
Board of Trustee Manual  
2016-2017 President's Executive Summary  
SDC Viewbook  
SDC Admissions Tri-Fold



November 14, 2017

California Student Aid Commission  
Lupita Cortez Alcala  
Executive Director  
PO Box 419028  
Rancho Cordova CA 95741-9028

To the California Student Aid Commission:

Pursuant to California Education Code 66290.2(a)(1), Simpson University is hereby submitting all documentation with regard to the Simpson University exemption under the Title IX statute and its implementing regulation at 34 C.F.R. § 106.12.

Title IX does not apply to an educational institution that is controlled by a religious organization to the extent that application of Title IX would be inconsistent with the religious tenets of the organization. Per the enclosed documentation, Simpson University has claimed and been granted an exemption.

Signed,

Robin Keith Dummer, Ed.D.  
President  
Simpson University  
2211 College View Dr  
Redding CA 96003  
530.226.4130  
president@simpsonu.edu

Office of the President

Office 530.226.4718

Fax 530.226.4860

2211 College View Drive

Redding, CA 96003

1.888.9.SIMPSON

simpsonu.edu



# THE MASTER'S UNIVERSITY

July 5, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2

To the California Student Aid Commission:

Pursuant to the California Education Code 66290.2(a)(1), The Master's University and Seminary is hereby submitting all documentation with regard to The Master's University and Seminary's exemption under the Title IX statute and its implementing regulation at 34 C.F.R. § 106.12. Title IX does not apply to an educational institution that is controlled by a religious organization to the extent that application of Title IX would be inconsistent with the religious tenets of the organization.

The Master's University is also exempt from the non-discrimination restrictions in California Education Code Section 66270 (the "Act"), in accordance with Section 66271 of the Act, to the extent such restrictions are not consistent with the religious tenets of the institution. As an educational institution controlled by a religious organization within the meaning of Title IX, The Master's University is exempt from the application of Title IX and the Act to the extent such regulations are not consistent with the institution's religious tenets.

The Master's University and Seminary was granted the Title IX regulatory exemption **January 18, 2017**. The statutory exemption is self-executing as set forth in 20 U.S.C. Section 1681(a)(3).

The exemption may apply to, but is not limited to, requirements as expressed in University policies including:

- Policies regarding student recruitment and admissions prohibitions on the basis of sex
- Policies regarding rules of behavior, sanctions, or other treatment
- Policies regarding limitation of rights, privileges, advantages, or opportunities
- Policies regarding all shared private spaces (i.e. residence halls, restrooms, locker rooms)
- Policies regarding athletics
- Policies regarding employment, including pre-employment inquiries, recruitment, and discrimination in employment for pregnancy leave, childbirth, termination of pregnancy, sexual orientation, and gender identity
- Policies regarding pregnancy and marital status

We retain all rights afforded to us under federal law and the laws of the State of California.

Sincerely,

John P. Stead, Ph.D.  
Senior Vice President & Provost



# THOMAS AQUINAS COLLEGE

*Office of the President*

---

November 16, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Disclosure requirement pursuant to CEC 66290.2.

To the California Student Aid Commission:

Thomas Aquinas College is an educational institution that is controlled by the Catholic Church that takes seriously anti-discrimination provisions under federal and state law, and is committed to providing a learning and living environment that promotes student safety, transparency, personal integrity, civility and mutual respect. Thomas Aquinas College is also exempted by the state from California Education Code 66270 to the extent the application of California Education Code 66270 is not consistent with the College's Catholic tenets.

The exemption may apply to, but is not limited to, requirements as expressed in University policies including: the College's founding document – A Proposal for the Fulfillment of Catholic Liberal Education <https://thomasaquinas.edu/sites/default/files/a-proposal-forthe-fulfillment-of-catholic-education.pdf> -- the College's mission statement; the Polity; Faculty, Staff, and Student Handbook <https://thomasaquinas.edu/sites/default/files/files/student-faculty-handbook-2017-18.pdf> ; Tutor Guide; Rules of Residence; housing policies; and religious policies, practices and customs . We retain all rights afforded to us under federal law and the laws of the State of California.

Signed,

Michael F. McLean, Ph.D.  
President



VANGUARD  
UNIVERSITY

September 11, 2017

California Student Aid Commission  
Lupita Cortez Alcalá  
Executive Director  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

Re: Update; Disclosure requirement pursuant to CEC 66290.2.

To the California Student Aid Commission:

I write to inform the Commission that Vanguard University's request to withdraw from its 1988 exemption from certain provisions of Title IX of the Education Amendments of 1972 (Title IX) was recently approved by the U.S. Department of Education Office of Civil Rights (OCR) in a letter from OCR dated September 5, 2017. The University's initial request was made to OCR in a letter dated December 15, 2016.

In compliance with California Education Code 66290.2 (a) (1), I have included OCR's September 5, 2017 letter referenced above to satisfy the requirement that copies of all materials submitted to, and received from, OCR concerning Title IX be submitted to the Commission.

Sincerely,

Michael J. Beals, Ph.D.  
President







# WESTMONT

GAYLE D. BEEBE, Ph.D.  
*President*

November 17, 2017

Lupita Cortez Alcalá  
California Student Aid Commission  
PO Box 419026  
Rancho Cordova, CA 95741-9026

Re: Disclosure requirement pursuant to CEC 66290.2

Dear Ms. Alcalá,

Westmont College was founded in 1937 on the twin principles of rigorous academics and a deep love for God. Since our founding, these twin rails have guided our mission helping to create in our students and graduates a strong moral orientation anchored to our belief in the fundamental dignity of every human person. As such, we strive to create a culture of integrity, care and respect that fosters a positive, supportive community committed to whole person development. We cherish this opportunity and continue to pursue our mission as part of the wide array of options that make up the rich fabric of higher education in California.

Within this context, Westmont takes seriously anti-discrimination provisions under federal and state law, and is committed to providing a learning and living environment that promotes student safety, transparency, personal integrity, and civility. In accordance with the requirements of provisions in Education Code 66290.2(a)(1), the college has never filed for a Title IX exemption. Still, we respectfully assert our exemption from Title IX and the provisions of state Education Code Section 66270 to the extent those provisions are inconsistent with our religious mission and this exemption would apply, but not be limited to, requirements as expressed in various Westmont College policies—Bylaws; Statement of Faith; mission statement; Community Life Statement; and Policy and Practices on Unlawful Discrimination, Unlawful Harassment, and Sexual Assault, all of which are available online

We retain any and all federal and state rights with this submission and do not waive any argument regarding the legality and constitutionality of this requirement.

Thank you for your attention to this matter.

Sincerely yours,

Gayle D. Beebe, Ph.D.  
President





**WILLIAM JESSUP**  
UNIVERSITY

November 14, 2017

Lupita Cortez Alcalá  
Executive Director  
California Student Aid Commission  
P.O. Box 419028  
Rancho Cordova, CA 95741-9028

To the California Student Aid Commission:

Pursuant to California Education Code 66290.2 (a) (1), William Jessup University is hereby submitting all documentation with regard to William Jessup University's exemption under the Title IX statute and its implementing regulation at [34 C.F.R. § 106.12](#). Title IX does not apply to an educational institution that is controlled by a religious organization to the extent that application of Title IX would be inconsistent with the religious tenets of the organization. Per the enclosed documentation, William Jessup University has claimed and been granted an exemption.

William Jessup University is also exempted by the state from California Education Code 66270 to the extent the application of California Education Code 66270 is not consistent with the institution's religious tenets.

The exemption may apply to, but is not limited to, requirements as expressed in University policies including: Statement of Faith, Community Covenant, Nondiscrimination Policy, Sexual Misconduct & Title IX Policy, Housing & Residential Life Policies, Student Conduct Process Statement, and Mission Statement (separate link).

For the online version: <http://www.jessup.edu/wp-content/uploads/2016/12/TitleIXDisclosure.pdf> and Mission Statement link <http://www.jessup.edu/about/who-we-are/>

We retain all rights afforded to us under federal law and the laws of the State of California.

Sincerely,

John Jackson, Ph.D.  
President

Attachments:

US Department of ED – Title IX Exemption Approval Letter 08/29/16

William Jessup University – Request for Title IX Religious Exemption Supplemental Letter 04/19/16

William Jessup University – Initial Request for Title IX Religious Exemption 04/28/15

