

No. 19-123

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**In the Supreme Court of the United States**

SHARONELL FULTON, ET AL., PETITIONERS

*v.*

CITY OF PHILADELPHIA, ET AL.

On Writ of Certiorari to the United States Court of  
Appeals for the Third Circuit

**BRIEF OF *AMICI CURIAE* COUNCIL FOR  
CHRISTIAN COLLEGES AND UNIVERSITIES,  
THE ASSOCIATION FOR BIBLICAL HIGHER  
EDUCATION, AND THIRTY-ONE INDIVIDUAL  
RELIGIOUS COLLEGES AND UNIVERSITIES  
SUPPORTING PETITIONERS**

GENE C. SCHAERR

*Counsel of Record*

ERIK S. JAFFE

HANNAH C. SMITH

KATHRYN E. TARBERT

JOSHUA J. PRINCE\*

SCHAERR | JAFFE LLP

1717 K Street NW, Suite 900

Washington, DC 20006

(202) 787-1060

gschaerr@schaerr-jaffe.com

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## QUESTIONS PRESENTED

1. Whether religious institutions and people of faith can establish a violation of the Free Exercise Clause *only* by proving a particular type of discrimination—namely that the government would allow the same conduct by someone who held different religious views, or whether courts must also consider other evidence that a law coercively targets religion or otherwise is not truly neutral and generally applicable.

2. Whether *Employment Division v. Smith* should be revisited.

3. Whether a government violates the First Amendment by conditioning a religious institution's ability to participate in a government contract or program on taking actions and/or making statements that directly contradict the institution's religious beliefs.

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R. Michael Paige et al., <i>Study Abroad for Global Engagement: The Long Term Impact of Mobility Experiences</i> , 20 Intercultural Educ. 29 (2009).....	12
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Ruby West Jackson & William T. McDonald, <i>Finding Freedom: The Untold Story of Joshua Glover, Runaway Slave</i> (2007).....	33
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Stephen Thomas Beers, <i>Faith Development of Christian College Students Engaged in a One- Month Study Abroad Mission Trip</i> (1999), <a href="http://cardinalscholar.bsu.edu/handle/handle/1750">http://cardinalscholar.bsu.edu/handle/handle/1750</a> 21 .....	11

Tanya Loudenback, *The 25 safest college campuses in America*, Business Insider (Jan. 12, 2016), <http://www.businessinsider.com/safest-college-campuses-in-america-2016-1> ..... 12

The Gilder Lehrman Institute of American History, *Conscientious Objectors: Madison Pardons Quakers*, 1816, [https://www.gilderlehrman.org/sites/default/files/inline-pdfs/00043\\_FPS.pdf](https://www.gilderlehrman.org/sites/default/files/inline-pdfs/00043_FPS.pdf) ..... 31

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*Why Major in Nursing*, Eastern University, <https://www.eastern.edu/academics/undergraduate-programs/bs-nursing-bsn> ..... 20

## INTRODUCTION AND INTERESTS OF *AMICI*<sup>1</sup>

The Third and Ninth Circuits’ misinterpretation of this Court’s precedent, especially *Employment Division v. Smith*, 494 U.S. 872 (1990), threatens the free-exercise rights of all religious organizations that seek to participate in government contracts and programs while maintaining religious practices. Indeed, such grants and assistance—from governments at all levels—are often critical to the ability of religious colleges and universities to carry out their academic and public-service missions. Given the extensive state support for religious higher education, affirmance of the decision below would hand governments an extremely potent weapon to wield against faith-based institutions whose religious practices place them at odds, in one way or another, with prevailing cultural norms.

Some 140 such faith-based institutions from across the country are represented by *amicus* Council for Christian Colleges and Universities (“CCCUC”), while *amicus* Association for Biblical Higher Education (“ABHE”) represents 152 such institutions. Thirty-one additional *amici*—all of them institutions of religious education—are also listed in Appendix A, along with links to their mission statements.

In everything they do, *amici* and their member institutions strive to provide a high-quality education while maintaining policies and practices consistent with their religious beliefs. Accordingly, *amici* have a

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<sup>1</sup> No one other than *amici*, their members, and counsel authored any part of this brief or made a contribution to fund it. Counsel for the parties have consented to its filing.

strong interest in preserving the First Amendment’s protection of free exercise of religion in the face of contracting or grant conditions that would otherwise require them to violate faith-based policies. Like the petitioners here, *amici* would be severely impaired in fulfilling their missions if, as in this case, their government contracts, grants, or programs were conditioned on abandoning practices that, although perhaps unpopular, are grounded in their faith.

### STATEMENT

The facts of this case are straightforward: Respondent City of Philadelphia partners with private institutions to better care for abused or neglected children. These partnerships help the city provide for the 6,000 children in its care by, among other things, helping it find urgently needed foster homes. Pet. 4.

Catholic Social Services (CSS) has long been one such partner. In 2017–2018 alone, CSS assisted nearly 20% of the children in the City’s care through foster placements, group homes, and its Community Umbrella Agency, which provides resources and support to keep children safe and families intact through crises and difficulties. Pet. 16a. Since its inception, CSS has grounded its actions in Catholic teachings, specifically that marriage is between one man and one woman. Despite CSS’s service to the city, Philadelphia—citing its Fair Practices Ordinance (FPO)—changed its contracts and froze CSS’s participation in the foster care program, in its words, to avoid “discrimination that occurs under the guise of religious freedom.” Pet. 147a.

CSS challenged this decision, claiming that Philadelphia had violated, among others, its rights under

the First Amendment’s Free Exercise Clause. Pet. 11a. Both the district court and the Third Circuit rejected CSS’s claims. For the Third Circuit, the Free Exercise question turned entirely on “whether CSS was treated differently because of its religious beliefs.” Pet. 32a. The panel treated all other evidence—including evidence showing that Philadelphia had adopted the new policy for the *purpose* of coercing religious organizations like CSS to change their practices—as irrelevant. Pet. 37a, 170a, 310a-312a. Instead the court opined that if CSS were to prevail, “then *Smith* is a dead letter, and the nation’s civil rights laws might be as well.” Pet. 37a-38a.

### SUMMARY OF ARGUMENT

In this case, the Third Circuit—following the Ninth Circuit’s lead—held that Philadelphia, without violating the Free Exercise Clause, could condition a government contract on a religious institution’s abandonment of a core religious practice. Moreover, its holding ignored strong record evidence that Philadelphia’s application of its policy to CSS and the reworking of its contracts was *designed* to coerce CSS to give up its religious practices with respect to the placement of foster children. Pet. Br. 12-15.

I. If this Court affirms that holding—or ignores the evidence of attempted coercion that tainted the Philadelphia ordinance—many of the unique societal benefits that religious institutions offer could be lost. Collectively, religious colleges and universities annually receive tens of billions of dollars in direct and indirect financial resources from governments at all levels. See Appendix B. If the decision below were affirmed, religious colleges could be forced to either

abandon some of the very religious practices that demonstrate their religious commitments, or forgo crucial funding or other governmental benefits.

Any such weakening of religious higher education would be an enormous loss. As Congress has repeatedly recognized, religious colleges offer students superior opportunities to integrate community service into their educations, to enjoy the physical and emotional safety that generally prevail in communities united by a common religious ethic, and to learn in an atmosphere of greater philosophical and political diversity than is offered in most non-religious institutions. Accordingly, the mere existence of religious colleges and universities adds valuable diversity to higher education in general. See, *e.g.*, 154 Cong. Rec. H7658-03 (2008); 20 U.S.C. 1011a(a)(2). If religious higher education institutions are unable to adhere to their religious policies, particularly on socially contentious issues, these schools will not be able to provide the unique benefits they now offer.

II. Thankfully, regardless whether a particular government policy is *motivated* by anti-religious animus, this Court's Free Exercise caselaw forbids the use of government programs to coerce action that violates an institution's religious beliefs. As the Court put it in *Trinity Lutheran Church of Columbia v. Comer*, the Free Exercise Clause protects religious individuals and institutions against even "*indirect coercion \* \* \** on the free exercise of religion." 137 S. Ct. 2012, 2022 (2017) (quoting *Lyng v. Nw. Indian Cemetery Protective Ass'n*, 485 U.S. 439, 450 (1988)) (emphasis added).

Contrary to the Third Circuit's conclusion, this Court's decision in *Smith*, does not allow governments

to attempt to compel religious institutions to abandon religious practices through neutral laws of general applicability. Outside the criminal context, nothing in that decision suggests that such coercion is subject only to rational-basis review. And just a few terms ago, this Court in *Trinity Lutheran* expressly recognized this limitation on *Smith*'s reach, holding that *Smith* applied only to criminal laws. See 137 S. Ct. at 2021. This Court's decisions in *Hosanna-Tabor v. EEOC*, 565 U.S. 171 (2012), and *Lee v. Weisman*, 505 U.S. 577 (1992), similarly recognized that the government cannot coerce either religious people or institutions to act in violation of their religious principles.

Thus, even if this Court declines to overrule *Smith*, it should once more clarify that even facially neutral laws can violate the Free Exercise Clause if they seek to coerce action that is contrary to an institution's—or a person's—religious beliefs. No religious institution should be forced to conform to every political orthodoxy—no matter how antithetical to its religious beliefs and values—in order to receive crucial funding or contracts. The decision below should be reversed.

## ARGUMENT

### **I. Religious Colleges and Universities, Which Benefit Society In Numerous Ways, Would Suffer Serious Harm Under the Third and Ninth Circuits' Erroneous Reading of *Smith*, *Lukumi*, and *Masterpiece*.**

This Court has long recognized the importance of strong religious institutions to American society and, accordingly, has long held that they “should not be inhibited in their activities[.]” *Walz v. Tax Commission*

of *City of New York*, 397 U.S. 664, 672 (1970). That is true, not only of religious denominational organizations, but of other religious institutions such as religious colleges and universities. Indeed, since long before the Constitution enshrined the right to freely exercise religious beliefs in the First Amendment, such institutions have nurtured the moral growth and character of their communities and, therefore, of the entire Nation. These institutions' ability to maintain their historic roles in American society would be severely compromised if this Court adopted the Third and Ninth Circuits' erroneous readings of bedrock religious-freedom precedents.

**A. Religious colleges and universities provide unique benefits that the government has long sought to protect and accommodate.**

Religious education in America predates government-sponsored education. Indeed, “churches [gave] birth to higher education in North America and \* \* \* nurtured it for much of its history.”<sup>2</sup> Before 1870, “colleges typically functioned as the intellectual arm of American Protestantism,”<sup>3</sup> and “colleges founded early in American history largely depended on sponsorship by religious communities[.]”<sup>4</sup> Thus, eight of the United

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<sup>2</sup> Jon H. Roberts & James Turner, *The Sacred and the Secular University* 20 (2000).

<sup>3</sup> *Ibid.*

<sup>4</sup> *Id.* at 10.

States' first nine colonial colleges were linked with denominational religion.<sup>5</sup> By the Civil War, 175 of America's 182 permanent colleges were religiously affiliated.<sup>6</sup>

Accordingly, higher education in America did not originate as a state-created system subject to government control. Instead, the model established by religious ministries centuries earlier provided the model for government-sponsored higher education.

The decision below threatens to destroy that venerable partnership between government and religious higher education. If, in the name of neutrality, the government can force a religious adoption agency to choose between upholding its religious beliefs or abandoning its mission of helping orphans, then the government could easily coerce religious schools to choose between fidelity to their religious beliefs and their educational ministries. This would violate the longstanding tradition of religious education that America has always embraced.

1. Beyond academic excellence competitive with secular schools, religious colleges and universities offer students advantages that are not as readily available in secular institutions. These include not only the opportunity to study academic disciplines from the standpoint of faith, but also the opportunity to natu-

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<sup>5</sup> Bernard J. Kohlbrenner, *Religion and Higher Education: An Historical Perspective*, 1 *History of Education Quarterly* 45, 46 (1961).

<sup>6</sup> *Ibid.*

rally integrate community service into higher education; enjoy greater physical safety; and experience a broader diversity of philosophical and political perspectives among professors and students.

As to the integration of faith and learning: The Committee on Academic Freedom and Academic Tenure of the American Association of University Professors long ago recognized that the “common good depends upon the free search for truth and its free exposition.”<sup>7</sup> But no search can truly be free if the available search methods are constrained. Consistent with that understanding of academic freedom, combining academic study with faith expands and even improves on the secular model of education because the “insistence on a single model of truth-seeking is inconsistent with the antidogmatic principles on which the case for academic freedom rests[.]”<sup>8</sup> In other words, interfering with religious colleges and universities interferes with the pursuit of truth itself.

Religious educational institutions’ integration of faith and learning is critical to their missions: The promise a religious college makes to students and their families is the opportunity to study academic disciplines through the lens of faith. For Christian colleges,

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<sup>7</sup> American Association of University Professors, *1940 Statement of Principles on Academic Freedom and Tenure: with 1970 Interpretive Comments*, 13, 14 (1970), <https://www.aaup.org/file/1940%20Statement.pdf>.

<sup>8</sup> Michael W. McConnell, *Academic Freedom in Religious Colleges and Universities*, 53 *Law and Contemporary Problems* 303, 312 (1990).

for example, faith, learning, life and work all come under “the Lordship of Jesus Christ,” as famously discussed by statesman and theologian Abraham Kuyper.<sup>9</sup> Religious colleges of other faiths also strive for such integration of faith and learning.<sup>10</sup> And for religious students and families, that integration is immensely valuable.

2. Religious colleges and universities also proactively serve their communities. Indeed, in the Higher Education Opportunity Act of 2008, Congress recognized the valuable service that religious schools perform in helping students integrate community service into their educational pursuits. Pub. L. No. 110-315 (2008). That is one reason why, among other things, that Act requires accrediting bodies to “respect[] the \* \* \* religious missions” of such institutions. 154 Cong. Rec. H7668 (2008). Noting that “[t]he time to recognize and encourage an increased commitment to public service is now,” the House Report on this Act noted the increasing number of students at religious colleges who serve religious missions or otherwise serve others—and relied on that reality as a reason for congressional protection. 154 Cong. Rec. H7661 (2008).

It is no coincidence that religious colleges foster such community service. Students and professors in these institutions are encouraged by their foundational religious texts, beliefs, and teachings to take

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<sup>9</sup> *Abraham Kuyper: A Centennial Reader* 488 (James D. Bratt ed., 1998).

<sup>10</sup> *E.g.*, *About*, Yeshiva University, <https://www.yu.edu/about> (last visited June 2, 2020).

care for the foreigner, the poor, and the needy.<sup>11</sup> And they are consequently more likely to embrace the principle that the value of one's life is measured not primarily by what one achieves in a secular occupation, but by how well one serves others.<sup>12</sup>

Thus, for instance, a student at a Catholic law school might be moved by the New Testament to provide pro bono assistance to unwed mothers or foster children.<sup>13</sup> Or a sociology major in a Jewish college might find inspiration in the Book of Exodus to study and address the plight of refugees.<sup>14</sup> Or a Muslim student might be inspired by the Quran to investigate the factors influencing immigration, then look for opportunities to serve local immigrants.<sup>15</sup>

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<sup>11</sup> See, *e.g.*, Deuteronomy 10:19 (ESV) (“Love the sojourner, therefore, for you were sojourners in the land of Egypt.”); Matthew 25:40 (KJV) (“Inasmuch as ye have done it unto one of the least of these my brethren, ye have done it unto me.”); Quran 16:90 (Sahih Int'l) (“Allah orders justice and good conduct and giving to relatives and forbids immorality and bad conduct and oppression.”); Mosiah 2:17 (from the Book of Mormon) (“[W]hen ye are in the service of your fellow beings ye are only in the service of your God.”).

<sup>12</sup> See, *e.g.*, Luke 12:15 (KJV) (“[A] man's life consisteth not in the abundance of things which he possesseth.”); Clayton M. Christensen et al., *How Will You Measure Your Life* (2012).

<sup>13</sup> See, *e.g.*, Matthew 25:35-40 (KJV) ; James 1:27 (KJV).

<sup>14</sup> See, *e.g.*, Exodus 22:20 (Tanakh) (“And you shall not mistreat a stranger, nor shall you oppress him, for you were strangers in the land of Egypt.”).

<sup>15</sup> See, *e.g.*, Quran 17:26 (Shafi) (“[G]ive \* \* \* to the needy and the wayfarers.”).

No doubt because of such religious teachings, studies show that, overall, students at religious colleges spend more time in community service than students at secular colleges, public or private.<sup>16</sup> Some students even pause their formal educations for domestic or overseas public service<sup>17</sup>—typically with the support of the institutions they attend.<sup>18</sup>

Moreover, as an integral part of their study abroad programs, religious colleges commonly provide opportunities for students who don't serve traditional (evan-

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<sup>16</sup> See CCCU, *The Case for Christian Higher Education* 8-10 (2018), [https://www.cccu.org/wp-content/uploads/2018/08/2018-Case-for-CHE\\_WEB\\_pages.pdf](https://www.cccu.org/wp-content/uploads/2018/08/2018-Case-for-CHE_WEB_pages.pdf); Elizabeth Weiss Ozorak, *Love of God and Neighbor: Religion and Volunteer Service Among College Students*, 44 Rev. Religious Res. 285, 289-291 (2003) (chronicling the increased volunteer activity of religious college students).

<sup>17</sup> Stephen Thomas Beers, *Faith Development of Christian College Students Engaged in a One-Month Study Abroad Mission Trip* (1999) (unpublished Ph.D. dissertation, Ball State University), <http://cardinalscholar.bsu.edu/handle/handle/175021>; Kathryn A. Tuttle, *The Effects of Short-term Mission Experienced on College Students' Spiritual Growth and Maturity*, 4NS Christian Educ. J. 123 (2000).

<sup>18</sup> See, e.g., *Center for Outreach & Mission Service*, La Sierra University, <https://lasierra.edu/missions/> (last visited June 2, 2020); *Andrews University Missions*, Office of Campus Ministries, *Andrews University Missions*, <https://www.andrews.edu/cm/missions/> (last visited June 2, 2020); *Missionary Deferments*, Brigham Young University, <https://enrollment.byu.edu/missionaries> (last visited June 2, 2020).

gelizing) missions to still serve as humanitarian volunteers in foreign countries.<sup>19</sup> Such humanitarian work not only benefits the religious groups of which the students are a part, but it also reduces cultural divides between nations and religions. That too benefits both students and society.

3. The social benefits of religious colleges and universities also extend to such mundane areas as physical safety. For instance, in a 2016 study of campus safety, Regent University, Summit University and Brigham Young University—all private, religious institutions—were named the safest in the nation.<sup>20</sup> Indeed, of the top twenty-five safest universities, eighteen (or seventy-two percent) are religious.<sup>21</sup> And colleges classified as the “most religious” consistently report much lower rates of sexual assault than the national average.<sup>22</sup>

For students and parents concerned about physical safety, then, religious colleges and universities are an

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<sup>19</sup> See R. Michael Paige et al., *Study Abroad for Global Engagement: The Long Term Impact of Mobility Experiences*, 20 *Intercultural Educ.* 29 (2009).

<sup>20</sup> Tanya Loudonback, *The 25 safest college campuses in America*, *Business Insider* (Jan. 12, 2016), <http://www.businessinsider.com/safest-college-campuses-in-america-2016-1>.

<sup>21</sup> *Id.*

<sup>22</sup> *On-campus Sexual Assault Statistics Head to Head*, EDSmart, <http://www.edsmart.org/college-sexual-assault-statistics-top-ranked-schools/#stats> (last visited June 2, 2020).

attractive option.<sup>23</sup> And the mere existence of such options in the higher education market encourages other institutions to place greater emphasis on student safety.

4. Religious colleges also contribute substantially to the diversity of American higher education. In most religions, the call to faith is a challenge to think and live differently from the rest of society. From the Islamic command to “[b]e in the world as if you were a stranger or traveler”<sup>24</sup> to Jesus’ command that his disciples be the “light of the world,”<sup>25</sup> people of faith are encouraged to transcend the cultures in which they live. Throughout the Nation’s history, this effort to live differently has suffused numerous religious schools—compelling them, for example, to help lead the fight against slavery.<sup>26</sup> Thus, it should come as no surprise that educational institutions founded and run by religious groups offer perspectives and emphases that differ, sometimes dramatically, from those offered by other educational institutions.

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<sup>23</sup> Indeed, recognizing these benefits, Muslim students also regularly attend non-Muslim religious schools. See, e.g., Richard Pérez-Peña, *Muslims From Abroad Are Thriving in Catholic Colleges*, N.Y. Times (Sep. 2, 2012), <https://www.nytimes.com/2012/09/03/education/muslims-enroll-at-catholic-colleges-in-growing-numbers.html>.

<sup>24</sup> Sahih al-Bukhari 6416, <https://sunnah.com/bukhari/81/5> (last visited June 2, 2020).

<sup>25</sup> Matthew 5:14-15 (KJV).

<sup>26</sup> *The Story of Yale Abolitionists*, Yale, Slavery & Abolition, *The Story of Yale Abolitionists*, <http://www.yaleslavery.org/Abolitionists/abolit.html> (last visited June 2, 2020).

This enhancement to educational diversity is illustrated by a recent comprehensive study addressing the political leanings of university faculties. The study confirmed that religious colleges and universities tend to do better at attracting professors and students from across the political spectrum: At non-religious, public universities, 65.7 percent of faculty across disciplines self-identify as either “liberal” or “far left,” while only 7.8 percent identify as “conservative” or “far right.”<sup>27</sup> By contrast, in non-Catholic religious colleges,<sup>28</sup> only 42.6 percent of professors identify as “liberal” or “far left” while 25.9 percent identify as “conservative” or “far right”<sup>29</sup>—nearly four times the percentage of faculty at non-religious institutions. These findings are buttressed by another comprehensive study analyzing the ideological balance at the top fifty law schools, and

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<sup>27</sup> Ellen B. Stolzenberg, et al., Higher Education Research Institute at UCLA, *Undergraduate Teaching Faculty: The HERI Survey, 2016-2017*, at 38 (2019), <https://heri.ucla.edu/monographs/HERI-FAC2017-monograph.pdf>.

<sup>28</sup> The study does not explicitly provide a category for non-Catholic religious *universities*. *Ibid.* *Amici* have no reason to believe that the ideologies of professors at non-Catholic religious *universities* differ in any meaningful respect from those at non-Catholic religious *colleges*.

<sup>29</sup> *Id.* at 38. Professors in Catholic colleges more closely align with national ideological averages, with 57.5 percent identifying as “liberal” or “far left” and 13.5 percent identifying as “conservative” or “far right.” *Ibid.*

finding that the two *most* balanced schools were both religious institutions.<sup>30</sup>

As a result of this diversity, religious schools are more likely than others to provide students extensive exposure to diverse political views. And that includes not only the more “conservative” views that are largely missing in many secular institutions, but also more progressive views that are leavened by religious perspectives.<sup>31</sup>

5. Congress has long valued and protected religious colleges precisely because of the diversity they provide. As it said in the Higher Education Opportunity Act, “[i]t is the sense of Congress that \* \* \* the [religious and other] diversity of institutions and educational missions is one of the key strengths of American higher education.” 20 U.S.C. 1011a(a)(2). Consistent with this conclusion, in justifying the tax-exempt status accorded to organizations like religious colleges and universities, Congress lauded their numerous social virtues, including their propensity for charitable service and their promotion of pluralism.<sup>32</sup>

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<sup>30</sup> Adam Bonica et al., *The Legal Academy’s Ideological Uniformity*, 47 J. Legal Stud. 1, 14 fig. 3 (2018) (showing that two religious law schools, Pepperdine University and Brigham Young University, are some of the most ideologically balanced in the nation).

<sup>31</sup> CCCU, *The Case for Christian Higher Education*, *supra* note 16, at 12 (67% of CCCU students report that their courses “often” or “very often” address topics such as religion).

<sup>32</sup> Grant M. Newman, *The Taxation of Religious Organizations in America*, 42 Harv. J. L. & Pub. Pol’y 681 (2019). These

For these reasons and others, Congress has consistently protected religious education, even in the face of the most compelling of competing interests. For instance, Congress passed Title VII to outlaw discrimination “against[] any individual because of his race, color, religion, sex, or national origin.”<sup>33</sup> But even Title VII exempts religious organizations from certain religious-discrimination provisions.<sup>34</sup> Likewise, Title IX—which specifically bars sex discrimination in education—contains a deliberate carveout exempting educational institutions from any application of Title IX that would be inconsistent “with the religious tenets of [the] organization.”<sup>35</sup>

In short, from the time religious colleges and universities first founded higher education in America, Congress and other governmental bodies have recognized their unique roles in bringing service, safety, and diversity to our Nation’s rising generation. As explained below, these unique benefits of religious higher

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reasons are further complimented by scholars who have argued that religious schools also valuably (1) contribute to the “ethical, cultural, and intellectual life of our nation,” (2) preserve and advances academic freedom and the pursuit of truth, and (3) safeguard religious freedom. McConnell, *Academic Freedom in Religious Colleges and Universities*, *supra* note 8, at 312; see also James D. Gordon III, *Individual and Institutional Academic Freedom at Religious Colleges and Universities*, 30 J.C. & U.L. 1 (2003).

<sup>33</sup> 42 U.S.C. 2000e-2(b).

<sup>34</sup> 42 U.S.C. 2000e-1(a) (exempting religious educational institutions where the traditional requirements of Title VII would impede their missions).

<sup>35</sup> 20 U.S.C. 1681(a)(3); 34 C.F.R. 106.12.

education would be seriously undermined by the Third and Ninth Circuits' view that, as a precondition to a government contract, a religious institution can be required to violate important religious beliefs.

**B. The standard applied below would do enormous harm to religious higher education by allowing governments to impose ostensibly neutral conditions on contracts or benefits in a way that coerces abandonment of faith-based practices.**

The decision below illustrates how the lower courts have misread *Smith* to allow the state to deliberately burden an institution's religious practice in a way that is repugnant to the original public meaning of the Free Exercise Clause. This interpretation of *Smith* and its progeny—now adopted by the Third and Ninth Circuits—poses enormous risks, not just to religious organizations like CSS, but to religious higher education and, indeed, virtually all other religious institutions and people of faith.

1. Governments have an unfortunate history of enacting facially neutral laws based on discriminatory, anti-religion animus—and applying them to religious education. Because of this history, the fear that government officials will direct such tactics at U.S. religious educational institutions is neither hypothetical nor exaggerated.

In the 1920s, for example, a law requiring students to be taught in public schools nearly shut down Oregon

Catholic schools that refused to conform to the curriculum and ideology of the political majority.<sup>36</sup> The law, proposed by the Scottish Rite Masonic Order and supported by the Ku Klux Klan, was marketed as an essential step in preserving “Americanism” and improving immigrant assimilation.<sup>37</sup> A supporter offered the following religion-neutral justification about the legislation:

We are for compulsory education in the public schools in a real sense \* \* \* \* [N]o child should be permitted to be educated in the primary grades at any private school. Some private schools are denominational, and some are intended merely snobbish. We do not believe in snobbery and are just as much opposed to private schools of the so-called ‘select’ kind as we are to denominational private schools.<sup>38</sup>

The initiative passed with a margin of over 11,000 votes.<sup>39</sup> But then, in *Pierce v. Society of Sisters*, 268 U.S. 510 (1925), this Court overturned the statute before it could take effect. Although the bill’s supporters had worked tirelessly to convince Oregonians that the law was religiously neutral, in practice its anti-Catholic bias was obvious: Of the 12,000 children attending

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<sup>36</sup> See, e.g., M. Paul Holsinger, *The Oregon School Bill Controversy, 1922-1925*, 37 Pac. Hist. Rev. 327, 330 (1968).

<sup>37</sup> *Id.* at 330-331.

<sup>38</sup> *Id.* at 330.

<sup>39</sup> *Id.* at 335.

private schools in Oregon in the 1920s, only a few attended “snobbish” secular private schools.<sup>40</sup> The rest attended parochial schools, the overwhelming majority of which were run by the Catholic Church.<sup>41</sup> This Court overturned the law not only because it violated the rights of Catholic schools, teachers, parents, and students, but also because there was no valid reason for suppressing private schools.<sup>42</sup>

Although *Pierce* was not nominally a Free Exercise case, it highlights how easily governments can use neutral and generally applicable laws to discriminate against religious educational institutions and pressure them to abandon religious practices.

2. While *amici* and their member schools are private institutions, many of them accept—either directly or indirectly—federal and/or state funding.<sup>43</sup> Like CSS, many religious colleges and universities also provide research or other services under government contracts. As shown in Appendix B, in the aggregate religious colleges and universities—and their students—receive more than \$13 billion in *federal* government

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<sup>40</sup> Holsinger, *supra* note 36, at 330.

<sup>41</sup> *Id.* at 330 n.14.

<sup>42</sup> See *Pierce*, 268 U.S. at 534-536.

<sup>43</sup> In the aggregate, for example, religious colleges in America received more than \$700 million in federal grants, more than \$160 million in contracts, and more than \$12 billion in student-loan funding—for a total investment exceeding \$13 billion. Appendix B at 80a. All data in Appendix B is taken from *Federal Investment in Higher Education*, Datalab, <https://datalab.usaspending.gov/colleges-and-universities/> (last visited June 2, 2020).

funds annually, and many receive substantial additional funds from state or local governments. The enormous cost of education makes these funds indispensable. Were these funds—or the government contracts on which they are predicated—withdrawn, it would be devastating for many religious institutions of higher learning.

Many religious colleges and universities also maintain contracts with state and local governments that facilitate their students' educational and employment prospects. For example, many colleges of education have contracts with local school districts to place their students in student-teaching positions.<sup>44</sup> And nursing programs typically have contracts with local hospitals, many of them owned by local governments, to place their students into internships and other offsite training opportunities.<sup>45</sup>

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<sup>44</sup> See, e.g., *Education Advisement Center*, Brigham Young University, [https://education.byu.edu/advisement/el\\_program](https://education.byu.edu/advisement/el_program) (last visited June 2, 2020) (addressing BYU's partnership with multiple local school districts); *Bachelor of Arts in Elementary Education*, Northwest University, <https://www.northwestu.edu/college-education/programs/bachelor-arts-elementary-education/> (last visited June 2, 2020) (addressing "NU's partnerships with local public \* \* \* schools").

<sup>45</sup> *Why Major in Nursing*, Eastern University, <https://www.eastern.edu/academics/undergraduate-programs/bs-nursing-bsn> (last visited June 2, 2020) (highlighting opportunities to work at "regional hospitals, health care facilities, and community settings"). The opposite is also true, and religious health-care facilities often partner with secular schools. See Julie Minda, *Health providers, nursing schools find creative ways to partner*, *Catholic Health World* (Apr. 1, 2019),

For all these reasons, affirmance here would give government officials at all levels a deadly weapon with which to coerce religious educational institutions into abandoning a variety of religious practices that the broader community might find objectionable. For example, many people—including government regulators and members of accrediting bodies—believe that activities such as casual extra-marital sex, alcohol use, experimentation with other drugs, profanity-laced protests and access to abortion are essential elements of a higher-education experience. Yet many religious universities prohibit some or all of these behaviors—on religious grounds.<sup>46</sup> These schools may well find themselves in danger of enforcement actions from accrediting bodies or government authorities who disagree, and who seek to use that disagreement as a basis for canceling or denying essential contracts or benefits. Indeed, the California legislature has already started down that path with a series of laws designed to force religious colleges and universities to back away from disfavored religious practices.<sup>47</sup>

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<https://www.chausa.org/publications/catholic-health-world/archives/issues/april-1-2019/health-providers-nursing-schools-find-creative-ways-to-partner>.

<sup>46</sup> See, e.g., *Church Educational System Honor Code*, Brigham Young University, <https://policy.byu.edu/view/index.php?p=26> (last visited June 2, 2020); *CCU Lifestyle Covenant*, Colorado Christian University, [https://www.ccu.edu/\\_files/documents/cus/lifestyle-covenant.pdf](https://www.ccu.edu/_files/documents/cus/lifestyle-covenant.pdf) (last visited June 2, 2020).

<sup>47</sup> See, e.g., S.B. 1146 (Cal. 2016) (requiring all exempt California religious colleges to prominently display the reasons for the exemption); A.B. 1888 (Cal. 2016) (purporting to condition funds

Similar opportunities for coercion are widely available at the federal level: In an article for *Change* magazine, George Bonham listed twelve federal laws governing higher education, including The Equal Pay Act, the Health Maintenance Organization Act, and the Employment Retirement Income Security Act.<sup>48</sup> Any of the laws on Bonham's unexhaustive list could be interpreted or applied so as to allow federal authorities to condition federal funds or other benefits on religious colleges' abandoning fundamental religious practices.

3. As this case illustrates, these dangers are real. Philadelphia's application of its Fair Practices Ordinance to CSS, for example, mirrors the 1922 Oregon Compulsory Education law by targeting and coercing a religious institution under the guise of neutrality. While the law's text may not explicitly address religion, the City Council essentially acknowledged that goal when it authorized the Commission on Human Relations' inquiry and stated that "Philadelphia has laws in place to protect its people from discrimination that occurs *under the guise of religious freedom*." Pet. 17a (emphasis added). In addition, when an employee from the Commission of Human Services called a select list of foster care agencies to ask them about evaluating potential foster parents who identify as LGBTQ, only one of the foster agencies on that list was

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from the "Cal Grant Program" on certification that the recipient religious school does not discriminate on the basis, *inter alia*, of "gender, gender identity, gender expression, \* \* \* religion, [or] sexual orientation"). A.B. 1888 died in committee.

<sup>48</sup> George W. Bonham, *Will Government Patronage Kill the Universities?*, 7 *Change* 10, 12 (1975/1976).

“secular”; the rest were religiously affiliated. Pet. 15a. By calling primarily *religious* foster care agencies, the Commission ensured that only those institutions would be affected by the Commission’s enforcement effort. Remarkably, the Third Circuit determined that such targeting “made sense” because religious agencies would likely object to the Ordinance’s application. Pet. 33a.

Furthermore, CSS never actually violated the city’s Ordinance before it lost its contract. Instead, the city declined to contract further with CSS on the mere *possibility* of a future violation. Worse still, the city updated its contracts in direct response to CSS’s religious faith to preclude further contracting with institutions holding its beliefs.

If the Free Exercise Clause allowed such targeted, coercive enforcement, government agencies could place religious colleges and universities in the crosshairs of neutral and generally applicable laws with impunity.

4. The societal benefits from Catholic Social Services—which operates a ministry for needy children dating back to the 18<sup>th</sup> century—are indisputable. Not only has CSS helped countless children, but it has also provided support beyond that offered by Philadelphia’s Department of Human Services to both foster and biological parents. Beyond these benefits, CSS provides valuable diversity to the foster care system.<sup>49</sup>

Similarly, *amici* and their member institutions bring enormous benefits to their students and their

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<sup>49</sup> Br. Former Foster Children and Parents et al. at 19-20.

communities. As explained above, religious universities provide greater diversity in thought and politics than their secular counterparts. They also encourage their students to give back to their communities at a greater rate than their counterparts. Like the primary schools in *Pierce*, religious colleges and universities have “long [been] regarded as useful and meritorious.”<sup>50</sup> More than anything, however, they provide an environment where students can safely and freely exercise their religious beliefs. They should be allowed to continue operating in accordance with their religious missions without coercive government restrictions. By rejecting the erroneous free exercise standard reflected in the decision below, this Court can remove an enormous threat to their ability to fulfill those missions.

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<sup>50</sup> *Pierce*, 268 U.S. at 534.

**II. To Avoid These Harms to Religious Liberty—  
and Religious Higher Education—the Court  
Should Hold that the First Amendment does  
not Permit Governments to Coerce Viola-  
tions of Religious Belief, Even Under the  
Guise of Neutrality, At Least Without Satis-  
fying Strict Scrutiny.**

The simple solution to the problems created by the Third and Ninth Circuits’ legal standard is to hold that, at least outside the criminal context as in *Smith*, laws or policies that coerce abandonment of religious practices are not, in fact, neutral, and may be saved, if at all, only if they satisfy strict scrutiny. See *Church of Lukumi Babalu Aye v. City of Hialeah*, 508 U.S. 520, 533 (1993) (citation omitted). As this Court emphasized in *Trinity Lutheran*, the Free Exercise Clause protects religious individuals and institutions against even “indirect coercion \* \* \* on the free exercise of religion.” 137 S. Ct. at 2022 (quoting *Lyng*, 485 U.S. at 450). Because the enforcement action at issue here consciously sought to interfere with CSS’s religious practice, that principle applies fully in this case, notwithstanding the ordinance’s facial neutrality. A ruling to that effect is important, not just to protect religious denominations and affiliated institutions like CSS, but to protect religious higher education and other religious entities and people of faith.

**A. The free-exercise standard applied below  
contravenes *Lukumi*, *Masterpiece  
Cakeshop*, and *Trinity Lutheran*.**

*Lukumi* and *Masterpiece Cakeshop* confirm the invalidity of laws or policies that—while conveniently

covered with a blanket of neutrality and general applicability—are designed or consciously applied to coerce abandonment of religious practices. See *Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm’n*, 138 S. Ct. 1719 (2018); *Lukumi*, 508 U.S. at 534. Indeed, where exceptions to a facially neutral law or policy reveal an intent to target a single religious practice, this Court routinely applies strict scrutiny. *Lukumi*, 508 U.S. at 545-546. The same is true where government actors *fail* to apply a facially neutral law or policy evenhandedly. *Masterpiece Cakeshop*, 138 S. Ct. at 1732. In reaching these holdings, this Court has properly looked to the enactment’s historical background, events spurring its enactment, its legislative history, and statements made by decisionmakers. *Id.* at 1731.

1. For example, in *Lukumi*, this Court analyzed both the circumstances surrounding the implementation of the pertinent animal-sacrifice laws and the exceptions the city had granted. *Lukumi*, 508 U.S. at 536-537. This Court held that the animal slaughter laws at issue—which provided numerous exceptions—were vastly underinclusive. *Id.* at 546-547. Indeed, the enforcement provisions of the laws left exceptions for nearly every form of animal slaughter except Santeria’s ritualistic sacrifice. *Id.* at 527-528. And on that basis the Court invalidated the challenged laws, despite their facial neutrality.

Similarly, in *Masterpiece Cakeshop*, decisionmakers granted exceptions to a cake-creation mandate for those holding favored secular opinions but not religious opinions. *Masterpiece Cakeshop*, 138 S. Ct. at 1732. The Court held that the application of the law to

a religious baker was unconstitutional because his “religious objection was not considered with the neutrality that the Free Exercise Clause requires.” *Id.* at 1731. And the commission’s resulting targeting of the cakeshop there made its actions unlawful under the First Amendment—again, notwithstanding the facial neutrality of the regulation at issue.

2. Like the Ninth, the Third Circuit tried to artificially limit *Lukumi* and *Masterpiece Cakeshop* to situations where the religious claimant can “show that it was treated more harshly than the government would have treated someone who engaged in the same conduct but held different religious views.” Pet. 26a. That is not what *Lukumi* or *Masterpiece* said, or held.

To the contrary, both decisions were based, at least in part, on concerns about government bodies attempting to coerce people or institutions of faith into abandoning religion-based practices. That appears to be why the Court in *Lukumi* emphasized the many laws passed by the local city council that were carefully tailored to discourage the plaintiffs’ religious animal sacrifices, while leaving other butchering practices intact. See 508 U.S. at 545-546. And in *Masterpiece*, the Human Rights Commission’s attempt to coerce Mr. Phillips into abandoning his religion-based policy about the custom cakes he would and would not design was a clear area of concern for virtually all this Court’s members. See 138 S. Ct. at 1729-1732.

Contrary to the Third Circuit’s view, neither decision turned on whether either plaintiff would (or would not) have been treated differently if it acted the same but “held different religious views.” Pet. 26a. And neither decision purported to overrule this Court’s

long-standing principle that the Free Exercise Clause protects religious individuals and institutions against “indirect coercion \* \* \* on the free exercise of religion.” *Trinity Lutheran*, 137 S. Ct. at 2022 (quoting *Lyng*, 485 U.S. at 450). That principle controls here.

**B. Even if this Court doesn’t overrule *Smith*, it should reiterate that, outside the criminal context, the government is at least subject to strict scrutiny when it knowingly coerces action or inaction in a way that violates religious conscience.**

Even were this not a case in which the government had intentionally focused on a religious practice, the City’s actions would still violate the First Amendment under this Court’s precedent. As this Court has repeatedly confirmed, even after *Smith*, the Free Exercise Clause protects religious individuals and institutions against “indirect coercion \* \* \* on the free exercise of religion.” *Trinity Lutheran*, 137 S. Ct. at 2020. Such coercion is amply present here, mandating at least strict scrutiny, regardless of *Smith*.

1. Well before *Smith*, this Court held that laws that coerce a person to use her body or resources in violation of her religious beliefs is subject to strict scrutiny. That was the rule applied to compulsory school attendance in *Wisconsin v. Yoder*, 406 U.S. 205, 221 (1972). And that decision squarely recognized that coercing religious persons to perform acts that violate their religious conscience is a “not only severe, but inescapable” burden on the free exercise of religion. *Id.* at 218.

To be sure, *Smith* limited *Yoder* to the extent it suggested that strict scrutiny *always* applies to non-coercive government action burdening religion. See *Smith*, 494 U.S. at 883-890. But, properly understood, *Smith* neither overruled *Yoder*'s reasoning nor abrogated its holding. Moreover, as explained above, *Smith* dealt with a specific subset of religious burdens—those in which government prohibits (through its criminal laws) religiously motivated conduct. That holding did not extend generally to situations like that in *Yoder*, and here, in which the burden on religion is governmental coercion of action that violates the actor's conscience.<sup>51</sup>

Further, as *Trinity Lutheran* clarified, *Smith*'s holding was only that “the Free Exercise Clause did not entitle the church members to a special dispensation from the general *criminal* laws on account of their religion.” *Trinity Lutheran*, 137 S. Ct. at 2021 (emphasis added). Thus, *Smith* left *Yoder*'s core holding intact: Outside the criminal context, government cannot coerce a person to engage in conduct that violates his religion—at least not without satisfying strict scrutiny.

2. Other decisions support the conclusion that the First Amendment is violated when the government, even indirectly (and outside the criminal context), con-

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<sup>51</sup> To be sure, dicta in *Smith* also endorsed prior decisions holding that governments can enforce tax and military conscription obligations even in the face of religious objections. See 494 U.S. at 880. But those are situations in which the obligation *satisfies* strict scrutiny.

sciously coerces action or inaction in violation of a person's religious belief. For example, this Court in *Hosanna-Tabor v. EEOC* explained that the ministerial exception—which prevents government from coercing churches to select or retain ministers—is required by the Free Exercise Clause. 565 U.S. at 188. And the Court framed the ministerial exception as a means of avoiding coercion—i.e., “imposing an unwanted minister”—in the same sentence in which it explained why the Free Exercise Clause requires the exception. *Ibid.* (emphasis added).

*Smith* does not limit this anti-coercion principle to the ministerial context. Indeed, two years after *Smith*, in *Lee v. Weisman*, the Court invoked both the Free Exercise and Establishment Clauses to invalidate a school prayer practice that imposed on students “subtle coercive pressures.” *Lee*, 505 U.S. at 588 (emphasis added). The Court there explained that both of “[t]he First Amendment’s Religion Clauses mean that religious beliefs and religious expression are too precious to be either proscribed or prescribed by the State.” *Id.* at 589.

3. The prohibition against coercing acts contrary to religious belief articulated in *Trinity Lutheran*, *Yoder*, *Hosanna-Tabor*, and *Lee* finds its roots in the founding. As Professor McConnell has explained, the very purpose of the Establishment Clause was to prevent several coercive activities by government, including mandated attendance at worship services.<sup>52</sup> Justice

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<sup>52</sup> See Michael McConnell, *Establishment and Disestablishment at the Founding, Part I: The Establishment of Religion*, 44 Wm. & M. L. Rev. 2105, 2131-2132, 2144 (2003).

Thomas echoed this last Term when he observed that “actual legal coercion \* \* \* was a hallmark of historical establishments of religion.” *Am. Legion v. Am. Humanist Ass’n*, 139 S. Ct. 2067, 2095 (2019) (Thomas, J., concurring in the judgment).

Another early example of hostility to any governmental coercion of action that violates religious conscience is the widespread colonial and post-revolution exemptions to military conscription. See *District of Columbia v. Heller*, 554 U.S. 570, 589-590 (2008) (discussing those laws in the context of the Second Amendment); *id.* at 661 (Stevens, J., dissenting) (same). At the founding, at least seven of the thirteen original state or colonial legislatures granted exemptions for Quakers and other conscientious objectors.<sup>53</sup>

Later, during the Madison administration, Maryland Quakers requested a pardon for defying a federal law attempting to coerce them into military service. Madison granted the pardon,<sup>54</sup> thereby demonstrating that he too opposed coercion in violation of religious conscience. No doubt for similar reasons, Congress has codified a “conscientious objection” exception to mili-

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<sup>53</sup> *City of Boerne v. Flores*, 521 U.S. 507, 558 (1997) (O’Connor, J., dissenting) (“Rhode Island, North Carolina, and Maryland exempted Quakers from military service in the late 1600’s. New York, Massachusetts, Virginia, and New Hampshire followed suit in the mid-1700’s.”).

<sup>54</sup> The Gilder Lehrman Institute of American History, *Conscientious Objectors: Madison Pardons Quakers*, 1816, at 4, [https://www.gilderlehrman.org/sites/default/files/inline-pdfs/00043\\_FPS.pdf](https://www.gilderlehrman.org/sites/default/files/inline-pdfs/00043_FPS.pdf).

tary service applicable to those “who, by reason of religious training and belief, [are] conscientiously opposed to participation in war in any form.” 50 U.S.C. 3806(j).

Another example of the Nation’s long-standing hostility toward governmental coercion of action or inaction in violation of religious conscience is the priest-penitent privilege, which precludes courts from compelling pastors to testify about information gleaned in confessional services and is reflected in the evidence codes of all fifty states.<sup>55</sup> This privilege too finds its genesis in early American history.<sup>56</sup> One early decision addressing the issue grounded the privilege in free-exercise principles: “It is essential to the free exercise of a religion” that the Church “be allowed to do the sacrament of penance.”<sup>57</sup>

Yet another illustrative practice involved the Fugitive Slave Act, which penalized those who obstructed the return of slaves to their masters or who even “obstruct[ed]” attempts to find a fugitive.<sup>58</sup> For religious objectors, the law thus coerced action and/or speech in

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<sup>55</sup> See Julie Ann Sippel, Comment, *Priest-Penitent Privilege Statutes: Dual Protection in the Confessional*, 43 Cath. U.L. Rev. 1127, 1128 n.6 (1994) (cataloging state statutes).

<sup>56</sup> See *People v. Phillips*, N.Y. Ct. Gen. Sess. (1813). An “editor’s report” of this unreported case is quoted in *Privileged Communications to Clergymen*, 1 Cath. Law 199 (1955); see Stephanie H. Barclay, *The Historical Origins of Judicial Religious Exemptions*, \_\_ Notre Dame L. Rev. \_\_ (forthcoming 2020) (manuscript at 11) (addressing the history of such exemptions).

<sup>57</sup> 1 Cath. Law at 207-208.

<sup>58</sup> Fugitive Slave Act, Act of Sept. 18, 1850, ch. 60, 9 Stat. 462 (1850).

violation of their religious beliefs.<sup>59</sup> Following Madison, two U.S. Presidents—James Buchanan and Abraham Lincoln—regularly pardoned people who violated the act, including those who violated it because their religious beliefs correctly recognized that its requirements were repugnant to their Christian faith’s core tenets.<sup>60</sup>

4. If, contrary to principles dating to the founding, this Court were to extend *Smith* to hold that mere rational-basis scrutiny applies to *all* laws or practices that coerce action or inaction contrary to religious belief, the Free Exercise Clause would be isolated within the First Amendment. For example, when government compels *speech*, such action is at least subject to strict scrutiny. *National Institute of Family & Life Advocates v. Becerra*, 138 S. Ct. 2361, 2371-2372 (2018); *Knox v. Serv. Emps. Int’l Union, Local 1000*, 567 U.S. 298, 309 (2012); *Wooley v. Maynard*, 430 U.S. 705, 713 (1977). Likewise, coercive violations of the Establishment or Free Press Clauses are categorically prohibited or, at a minimum, subject to strict scrutiny. See *Lee*, 505

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<sup>59</sup> *Ibid.* Failing to cooperate with attempts to coerce testimony as to the location of a fugitive is the classic definition of obstruction. See Black’s Law Dictionary 1246 (10th Ed. 2014) (“obstruction of justice” includes “giving false information \* \* \* or withholding evidence”).

<sup>60</sup> Stephen Middleton, *The Black Laws: Race and the Legal Process in Early Ohio* 239-240 (2005) (pardon of Reverend George Gordon by Abraham Lincoln); Ruby West Jackson & William T. McDonald, *Finding Freedom: The Untold Story of Joshua Glover, Runaway Slave* 89 (2007) (pardon of Sherman Booth by James Buchanan).

U.S. at 588 (Establishment Clause forbids subtle coercion); *Hosanna-Tabor*, 565 U.S. at 189; *Miami Herald Pub. Co., Div. of Knight Newspapers, Inc. v. Tornillo*, 418 U.S. 241, 261 (1974) (“[L]iberty of the press is in peril as soon as the *government tries to compel* what is to go into a newspaper.”) (citation omitted) (emphasis added). The Free Exercise Clause must likewise prohibit coercion (at least outside the criminal context), as the Clause must be “read in [its] context and with a view to [its] place in the overall [amendment].” *Davis v. Michigan Dept. of Treasury*, 489 U.S. 803, 809 (1989).

To be sure, not every resistance to coercive laws will lead to socially desirable results. But the same is also true of free speech. Indeed, like free speech claims, free exercise claims are brought by a wide range of individuals and groups. But this only shows the Free Exercise Clause’s importance: The same authority to coerce action or inaction that today afflicts CSS could be used tomorrow to coerce others—including *amici*—to act contrary to their religious beliefs. Indeed, that same authority could be used tomorrow to coerce such violations of conscience by those now in the majority. The First Amendment forbids such coercion.

## CONCLUSION

By virtue of their religious missions, religious colleges and universities serve a valuable role that is threatened by the misinterpretation of *Smith* employed by the Third Circuit here. Even if this Court does not overrule *Smith*, it should clarify that governmental actions (other than criminal laws) that consciously seek to coerce religious institutions to act contrary to their religious beliefs violate the First Amendment—or, at a minimum, require strict scrutiny. The decision below should be reversed.

Respectfully submitted,

Gene C. Schaerr

*Counsel of Record*

Erik S. Jaffe

Hannah C. Smith

Kathryn E. Tarbert

Joshua J. Prince\*

Schaerr | Jaffe LLP

1717 K Street NW, Suite 900

Washington, D.C. 20006

(202) 787-1060

gschaerr@schaerr-jaffe.com

\* Not yet admitted in D.C.

Practicing under the supervision of D.C. attorneys under Rule 49(c)(8)

June 3, 2020

## APPENDICES

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**APPENDIX A  
LIST OF AMICI**

(with links to their mission statements)

**Associations**

Association for Biblical Higher Education  
<https://www.abhe.org/about-abhe/abhe-mission/>

Council for Christian Colleges and Universities  
<https://www.cccu.org/institutions/>.

**Individual Universities and Colleges**

Anderson University, Anderson, SC  
<https://andersonuniversity.edu/about-au/mission-vision-values-statement>

Bethel University, Saint Paul, MN  
<https://www.bethel.edu/about/mission-vision>

Biola University, La Mirada, CA  
<https://www.biola.edu/about/mission>

Bluefield College, Bluefield, VA  
<http://www.bluefield.edu/about/vision-and-mission/>

Brigham Young University Provo, UT  
<https://catalog.byu.edu/about-byu/mission-of-byu>

Brigham Young University – Idaho, Rexburg, ID  
<http://www.byui.edu/about/mission-statement>

Brigham Young University – Hawaii, Laie, HI  
<https://about.byuh.edu/about-byuh/mission-and-vision>

College of the Ozarks, Point Lookout, MO  
<https://www.cofu.edu/Page/About-C-of-O/Mission-Vision-Goals.64.html>

Cornerstone University, Grand Rapids, MI  
<https://www.cornerstone.edu/why-cornerstone-university/identity-mission-and-vision/>

Crown College, Saint Bonifacius, MN  
<https://www.crown.edu/about/heritage-purpose/>

Evangel University, Springfield, MO  
<https://www.evangel.edu/life-at-evangel-home/spiritual-life/>

Grace College and Seminary, Winona Lake, IN  
<https://www.grace.edu/about/grace-college/our-mission>

Houghton College, Caneadea, NY  
<https://www.houghton.edu/about/college-profile>

Houston Baptist University, Houston, TX  
<https://hbu.edu/university-catalog/general-information/#visionmissionpurpose>

John Brown University, Siloam Springs, AR  
<https://www.jbu.edu/about/who-we-are/>

LDS Business College, Salt Lake City, UT  
<https://www.ldsbc.edu/about>

Mid-Atlantic Christian University, Elizabeth City, NC  
<http://www.macuniversity.edu/about/mission-vision>

Montreat College, Montreat, NC  
<https://www.montreat.edu/about/mission>

North Greenville University, Tigersville, SC  
<https://www.ngu.edu/about-ngu.php>

Northwest University, Kirkland, WA  
<https://www.northwestu.edu/about/mission/>

Oklahoma Christian University, Oklahoma City, OK  
<https://www.oc.edu/about/history/oc-covenant>

Olivet Nazarene University, Bourbonnais, IL  
[https://www.olivet.edu/sites/default/files/pdf/Statement\\_of\\_Mission\\_Faith\\_and\\_Lifestyle.pdf](https://www.olivet.edu/sites/default/files/pdf/Statement_of_Mission_Faith_and_Lifestyle.pdf)

Point University, West Point, GA  
<https://point.edu/about/goals/>

Spring Arbor University, Spring Arbor, MI  
<https://www.arbor.edu/about/mission-and-values/>

Southern Wesleyan University, Central, SC  
<https://www.swu.edu/about/who-we-are/>

St. Edwards University, Austin, TX  
<https://www.stedwards.edu/about-st-edwards-university/history-mission>

Taylor University, Upland, IN  
<https://www.taylor.edu/distinctions>

University of Northwestern, St. Paul, MN  
<https://unwsp.edu/about-us/christian-values/mission-and-vision>

Wesley Biblical Seminary, Ridgeland, MS  
<https://wbs.edu/about-us/why-seminary-why-wesley/wbs-distinctives/>

Wyoming Catholic College, Lander, WY  
<https://wyomingcatholic.edu/about/mission/>

Union University, Jackson, TN  
<http://www.uu.edu/about/what-we-believe.cfm>

**APPENDIX B\***  
**FEDERAL FUNDING OF RELIGIOUS COLLEGES AND UNIVERSITIES**

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Allen Univ.	African Methodist Episcopal	\$2.7 M	\$0.0 M	\$8.7 M	\$11.4 M
Edward Waters Coll.	“	\$2.6 M	\$0.0 M	\$10.4 M	\$13.0 M
Paul Quinn Coll.	“	\$2.6 M	\$0.0 M	\$5.0 M	\$7.6 M
Payne Theological Seminary	“	\$0.0 M	\$0.0 M	\$1.8 M	\$1.8 M
Shorter Coll.	“	\$1.9 M	\$0.0 M	\$5.8 M	\$7.7 M
Wilberforce Univ.	“	\$2.5 M	\$0.0 M	\$6.4 M	\$8.9 M

\* All data are taken from *Federal Investment in Higher Education*, Datalab, <https://datalab.usaspending.gov/colleges-and-universities/> (last visited June 2, 2020).

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Clinton Coll.	African Methodist Episcopal Zion	\$0.9 M	\$0.0 M	\$2.7 M	\$3.6 M
Hood Theological Seminary	"	\$0.0 M	\$0.0 M	\$1.6 M	\$1.6 M
Livingstone Coll.	"	\$4.0 M	\$0.0 M	\$18.6 M	\$22.6 M
Evangel Univ.	Assemblies of God	\$0.0 M	\$0.0 M	\$15.7 M	\$15.7 M
Northwest Univ.	"	\$0.0 M	\$0.0 M	\$17.6 M	\$17.6 M
Southeast Univ.	"	\$0.0 M	\$0.0 M	\$57.3 M	\$57.3 M
Southwestern Assemblies of God Univ.	"	\$0.0 M	\$0.0 M	\$22.1 M	\$22.1 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
SUM Bible Coll. & Seminary	Assemblies of God	\$0.0 M	\$0.0 M	\$4.3 M	\$4.3 M
Trinity Bible Coll.	“	\$0.0 M	\$0.0 M	\$1.5 M	\$1.5 M
Univ. of Valley Forge	“	\$0.0 M	\$0.0 M	\$7.9 M	\$7.9 M
Vanguard Univ. of S. Cal.	“	\$1.3 M	\$0.0 M	\$21.5 M	\$22.7 M
Bridges Christian Coll.	“	NA	NA	NA	NA
Latin American Bible Institute	“	NA	NA	NA	NA
Native American Bible Coll.	“	NA	NA	NA	NA
Northpoint Bible Coll.	“	NA	NA	NA	NA

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Northpoint Bible Coll.- Grand Rapids	Baptist – General	NA	NA	NA	NA
American Baptist Coll.	“	\$2.4 M	\$0.0 M	\$1.0 M	\$3.4 M
Anderson Univ. (South Carolina)	“	\$0.0 M	\$0.0 M	\$15.7 M	\$15.7 M
Arkansas Baptist Coll.	“	\$2.3 M	\$0.0 M	\$3.5 M	\$5.8 M
Arlington Baptist Coll.	“	\$0.0 M	\$0.0 M	\$1.8 M	\$1.8 M
Averett Univ.	“	\$0.0 M	\$0.0 M	\$16.4 M	\$16.4 M
B. H. Carroll Theological Institute	“	NA	NA	NA	NA
Baptist Bible Coll.	“	\$0.0 M	\$0.0 M	\$2.4 M	\$2.4 M
Baptist Coll. of Fla.	“	\$0.0 M	\$0.0 M	\$2.3 M	\$2.3 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Baptist Mem'l Coll. of Health Sciences	Baptist – General	\$0.0 M	\$0.0 M	\$12.1 M	\$12.1 M
Baptist Missionary Ass'n Theological Seminary	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M
Baptist Univ. of the Americas	“	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Baylor Univ.	“	\$13.5 M	\$0.8 M	\$128.1 M	\$142.4 M
Bethel Univ.	“	\$0.1 M	\$0.0 M	\$49.8 M	\$49.9 M
Bluefield Coll.	“	\$0.0 M	\$0.0 M	\$11.8 M	\$11.8 M
Boston Baptist Coll.	“	\$0.0 M	\$0.0 M	\$0.4 M	\$0.4 M
Brewton-Parker Coll.	“	\$0.0 M	\$0.0 M	\$5.2 M	\$5.2 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Campbell Univ.	Baptist – General	\$1.7 M	\$0.7 M	\$117.7 M	\$120.1 M
Campbellsville Univ.	“	\$0.5 M	\$0.0 M	\$28.9 M	\$29.4 M
Cedarville Univ.	“	\$0.0 M	\$0.0 M	\$27.0 M	\$27.0 M
Central Christian Univ. of South Carolina	“	NA	NA	NA	NA
Clarks Summit Univ.	“	\$0.0 M	\$0.0 M	\$3.6 M	\$3.6 M
Clear Creek Baptist Bible Coll.	“	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Corban Univ.	“	\$0.0 M	\$0.0 M	\$8.3 M	\$8.3 M
Dallas Baptist Univ.	“	\$0.0 M	\$0.0 M	\$29.6 M	\$29.6 M
Davis Coll.	“	\$0.0 M	\$0.0 M	\$1.3 M	\$1.3 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
E. Texas Baptist Univ.	Baptist – General	\$0.0 M	\$0.0 M	\$12.3 M	\$12.3 M
Emmaus Bible Coll.	“	\$0.0 M	\$0.0M	\$1.3 M	\$1.3 M
Faith Baptist Bible Coll.	“	\$0.0 M	\$0.0 M	\$1.3 M	\$1.3 M
Fla. Mem <sup>1</sup> Univ.	“	\$3.8 M	\$0.0 M	\$14.0 M	\$17.8 M
Georgetown Coll.	“	\$0.0 M	\$0.0 M	\$13.1 M	\$13.1 M
Heritage Coll. & Seminary	“	NA	NA	NA	NA
Howard Payne Univ.	“	\$0.0 M	\$0.0 M	\$8.5 M	\$8.5 M
Int <sup>1</sup> Baptist Coll. & Seminary	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M
Jacksonville Coll.	“	\$0.0 M	\$0.0 M	\$1.0 M	\$1.0 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Judson Coll.	Baptist – General	\$0.0 M	\$0.0 M	\$2.5 M	\$2.5 M
Judson Univ.	“	\$0.0 M	\$0.0 M	\$12.0 M	\$12.0 M
Louisiana Coll.	“	\$0.0 M	\$0.0 M	\$9.9 M	\$9.9 M
Luther Rice Coll. & Seminary	“	\$0.0 M	\$0.0 M	\$5.9 M	\$5.9 M
Maple Springs Baptist Bible Coll. and Seminary	“	NA	NA	NA	NA
Maranatha Baptist Univ.	“	\$0.0 M	\$0.0 M	\$3.0 M	\$3.0 M
Mississippi Coll.	“	\$0.0 M	\$0.0 M	\$52.4 M	\$52.4 M
Mo. Baptist Univ.	“	\$0.0 M	\$0.0 M	\$25.8 M	\$25.8 M
Morris Coll.	“	\$3.1 M	\$0.0 M	\$8.7 M	\$11.8 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Northwest Baptist Theological Seminary	Baptist – General	NA	NA	NA	NA
Oakland City Univ.	“	\$1.0 M	\$0.0 M	\$4.3 M	\$5.3 M
Okla. Baptist Univ.	“	\$0.0 M	\$0.0 M	\$13.3 M	\$13.3 M
Piedmont Int'l Univ.	“	\$0.0 M	\$0.0 M	\$3.8 M	\$3.8 M
Samford Univ.	“	\$2.5 M	\$0.0 M	\$67.1 M	\$69.6 M
Selma Univ.	“	\$0.0 M	\$0.0 M	\$3.1 M	\$3.1 M
Shasta Bible Coll.	“	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Shaw Univ.	“	\$3.2 M	\$0.0 M	\$23.5 M	\$26.7 M
Shepherds Theological Seminary	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Shorter Univ.	Baptist – General	\$0.0 M	\$0.0 M	\$14.8 M	\$14.8 M
Simmons Coll. of Kentucky	“	\$0.5 M	\$0.0M	\$0.7 M	\$1.2 M
Southeast. Baptist Coll.	“	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Southern California Seminary	“	\$0.0 M	\$0.0 M	\$1.3 M	\$1.3 M
Texas Baptist Institute & Seminary	“	NA	NA	NA	NA
Union Univ.	“	\$0.1 M	\$0.0 M	\$40.2 M	\$40.3 M
Univ. of Mary Hardin-Baylor	“	\$0.0 M	\$0.0 M	\$41.7 M	\$41.7 M
Univ. of the Cumberlands	“	\$0.0 M	\$0.0 M	\$47.8 M	\$47.8 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Va. Beach Theological Seminary	Baptist – General	\$0.0 M	\$0.0 M	\$0.0 M	\$0.0 M
Va. Univ. of Lynchburg	“	\$0.8 M	\$0.0 M	\$3.6 M	\$4.3 M
William Carey Univ.	“	\$0.0 M	\$0.1 M	\$60.5 M	\$60.6 M
Yellowstone Christian Coll.	“	NA	NA	NA	NA
Alderson Broaddus Univ.	Baptist – American	\$0.0 M	\$0.0 M	\$11.7 M	\$11.7 M
Bacone Coll.	“	\$0.3 M	\$0.0 M	\$9.7 M	\$10.0 M
Benedict Coll.	“	\$6.0 M	\$0.0 M	\$30.2 M	\$36.2 M
Eastern Univ.	“	\$0.6 M	\$0.0 M	\$25.1 M	\$25.7 M
Franklin Coll.	“	\$0.0 M	\$0.0 M	\$9.4 M	\$9.4 M
Linfield Coll.	“	\$0.6 M	\$0.0 M	\$17.9 M	\$18.5 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Northern Baptist Theological Seminary	Baptist – American	\$0.0 M	\$0.0 M	\$0.6 M	\$0.6 M
Va. Union Univ.	“	\$4.6 M	\$0.0 M	\$19.3 M	\$23.9 M
Louisiana Baptist Univ.	Baptist – Bible Fellowship	NA	NA	NA	NA
Southeastern Free Will Baptist Coll.	Baptist – Free Will	NA	NA	NA	NA
California Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Randall Univ.	“	\$0.0 M	\$0.0 M	\$2.8 M	\$2.8 M
Welch Coll.	“	\$0.0 M	\$0.0 M	\$1.8 M	\$1.8 M
Pensacola Christian Coll.	Baptist – Independent	NA	NA	NA	NA

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Trinity Baptist Coll.	Baptist – Independent	NA	NA	NA	NA
Veritas Baptist Coll.	“	NA	NA	NA	NA
West Coast Baptist Coll.	“	NA	NA	NA	NA
Sioux Falls Seminary	Baptist – North American	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M
Univ. of Mount Olive	Baptist – Original Free Will	\$0.7 M	\$0.0 M	\$31.5 M	\$32.2 M
Blue Mountain Coll.	Baptist – Southern	\$0.1 M	\$0.0 M	\$3.1 M	\$3.2 M
Boyce Coll.	“	NA	NA	NA	NA
California Baptist Univ.	“	\$1.3 M	\$0.0 M	\$132.7 M	\$134.0 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Carson- Newman Univ.	Baptist – Southern	\$0.0 M	\$0.0 M	\$20.4 M	\$20.4 M
Charleston Southern Univ.	“	\$0.5 M	\$0.0 M	\$28.5 M	\$ 29.0 M
Chowan Univ.	“	\$0.5 M	\$0.0 M	\$20.2 M	\$20.7 M
Crisswell Coll.	“	\$0.0 M	\$0.0 M	\$1.2 M	\$1.2 M
Fruitland Baptist Bible Coll.	“	NA	NA	NA	NA
Gardner-Webb Univ.	“	\$0.0 M	\$0.0 M	\$34.5 M	\$34.5 M
Hannibal- LaGrange Univ.	“	\$0.0 M	\$0.0 M	\$6.6 M	\$6.6 M
Hardin- Simmons Univ.	“	NA	NA	NA	NA
Houston Baptist Univ.	“	\$1.1 M	\$0.0 M	\$26.8 M	\$27.9 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
L.R. Scarborough Coll.	Baptist – Southern	NA	NA	NA	NA
Leavell Coll.	“	NA	NA	NA	NA
Mars Hill Univ.	“	\$0.8 M	\$0.0 M	\$12.3 M	\$13.1 M
Midwestern Baptist Coll.	“	NA	NA	NA	NA
Midwestern Baptist Theological Seminary	“	\$0.0 M	\$0.0 M	\$6.4 M	\$6.4 M
Mississippi Coll.	“	\$0.0 M	\$0.0 M	\$52.4 M	\$52.4 M
N. Greenville Univ.	“	\$0.0 M	\$0.0 M	\$20.1 M	\$20.1 M
Northeastern Bible Coll.	“	NA	NA	NA	NA
Ouachita Baptist Univ.	“	\$1.7 M	\$0.0 M	\$9.4 M	\$11.1 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Southwest Baptist Univ.	Baptist – Southern	\$0.5 M	\$0.0 M	\$25.6 M	\$26.1 M
The College at Southeastern	“	NA	NA	NA	NA
Truett McConnell Univ.	“	\$0.0 M	\$0.0 M	\$5.8 M	\$5.8 M
Univ. of Mobile	“	\$0.0 M	\$0.0 M	\$14.8 M	\$14.8 M
Wayland Baptist Univ.	“	\$0.0 M	\$0.0 M	\$33.1 M	\$33.1 M
Williams Baptist Coll.	“	\$0.0 M	\$0.0 M	\$3.6 M	\$3.6 M
Wingate Univ.	“	NA	NA	NA	NA
Ashland Univ.	Brethren Church	\$0.9 M	\$0.0 M	\$44.1 M	\$45 M
Calvary Chapel Bible Coll.	Calvary Chapel of Costa Mesa	NA	NA	NA	NA

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Crown Coll.	Christian & Missionary Alliance	\$0.0 M	\$0.0 M	\$10.9 M	\$10.9 M
Nyack Coll.	“	\$0.0 M	\$0.0 M	\$19.6 M	\$19.6 M
Simpson Univ.	“	\$1.8 M	\$0.0 M	\$7.8 M	\$9.6 M
Toccoa Falls Coll.	“	\$0.0 M	\$0.0 M	\$4.6 M	\$4.6 M
Calvin Theological Seminary	Christian Reformed	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M
Bethany Theological Seminary	Church of Brethren	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Bridgewater Coll.	“	\$0.0 M	\$0.0 M	\$17.6 M	\$17.6 M
Manchester Univ.	“	\$0.3 M	\$0.0 M	\$25.3 M	\$25.6 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
McPherson Coll.	Church of Brethren	\$0.0 M	\$0.0 M	\$6.4 M	\$6.4 M
Anderson Univ. (Indiana)	Church of God	\$0.0 M	\$0.0 M	\$25.4 M	\$25.4 M
Kansas Christian Coll.	“	\$0.0 M	\$0.0 M	\$1.1 M	\$1.1 M
Lee Univ.	“	\$1.1 M	\$0.0 M	\$35.0 M	\$36.1 M
Mid-America Christian Univ.	“	\$0.0 M	\$0.0 M	\$19.1 M	\$19.1 M
Pentecostal Theological Seminary	“	\$0.0 M	\$0.0 M	\$2.2 M	\$2.2 M
Univ. of Findlay	“	\$0.0 M	\$0.0 M	\$39.8 M	\$39.8 M
Warner Pacific Coll.	“	\$0.0 M	\$0.0 M	\$9.9 M	\$9.9 M
Warner Univ.	“	\$0.0 M	\$0.0 M	\$12.9 M	\$12.9 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Brigham Young Univ.-Idaho	Church of Jesus Christ of Latter-day Saints	\$0.0 M	\$0.0 M	\$133.4 M	\$133.4 M
Brigham Young Univ.-Hawaii	“	\$0.0 M	\$0.0 M	\$6.2 M	\$6.2 M
Brigham Young Univ. (Provo)	“	\$17.1 M	\$0.2 M	\$100.9 M	\$118.2 M
Southern Va. Univ.	“	\$0.0 M	\$0.0 M	\$7.9 M	\$7.9 M
Highlands Coll.	Church of the Highlands	NA	NA	NA	NA
E. Nazarene Coll.	Church of the Nazarene	\$0.0 M	\$0.0 M	\$7.6 M	\$7.6 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Mid-Am. Nazarene Univ.	Church of the Nazarene	\$1.4 M	\$0.0 M	\$16.4 M	\$17.8 M
Mount Vernon Nazarene Univ.	“	\$0.5 M	\$0.0 M	\$15.2 M	\$15.7 M
Nazarene Bible Coll.	“	\$0.0 M	\$0.0 M	\$3.0 M	\$3.0 M
Nazarene Theological Seminary	“	\$0.0 M	\$0.0 M	\$0.6 M	\$0.6 M
Northwest Nazarene Univ.	“	\$0.1 M	\$0.0 M	\$17.8 M	\$17.9 M
Olivet Nazarene Univ.	“	\$0.0 M	\$0.0 M	\$38.6 M	\$38.6 M
Point Loma Nazarene Univ.	“	\$0.0 M	\$0.1 M	\$45.2 M	\$45.3 M
Southern Nazarene Univ.	“	\$0.5 M	\$0.0 M	\$23.2 M	\$23.7 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Trevecca Nazarene Univ.	Church of the Nazarene	\$0.0 M	\$0.0 M	\$40.6 M	\$40.6 M
Ambrose Univ.	“	NA	NA	NA	NA
Abilene Christian Univ.	Churches of Christ	\$0.9 M	\$0.0 M	\$40.5 M	\$41.4 M
Amridge Univ.	“	\$0.0 M	\$0.0 M	\$11.8 M	\$11.8 M
Austin Graduate School of Theology	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M
Bear Valley Bible Institute	“	NA	NA	NA	NA
Boise Bible Coll.	“	\$0.0 M	\$0.0 M	\$0.6 M	\$0.6 M
Burritt Coll.	“	NA	NA	NA	NA
Carolina Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.8 M	\$0.8 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Central Christian Coll. Of the Bible	Churches of Christ	\$0.0 M	0.0 M	\$1.7 M	\$1.7 M
Crowley's Ridge Coll.	"	\$0.0 M	\$0.0 M	\$1.6 M	\$1.6 M
Dallas Christian Coll.	"	\$0.0 M	\$0.0 M	\$2.5 M	\$2.5 M
Faulkner Univ.	"	\$0.0M	\$0.0 M	\$36.1 M	\$36.1 M
Freed-Hardeman Univ.	"	\$0.0 M	\$0.0 M	\$15.1 M	\$15.1 M
Great Lakes Christian Coll.	"	\$0.0 M	\$0.0 M	\$1.3 M	\$1.3 M
Harding Univ.	"	\$0.7 M	\$0.0 M	\$53.4 M	\$54.1 M
Heritage Christian Univ.	"	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Hope Int'l Univ.	"	\$0.0 M	\$0.0 M	\$8.1 M	\$8.1 M
Johnson Univ.	"	\$0.0 M	\$0.0 M	\$10.4 M	\$10.4 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Kentucky Christian Univ.	Churches of Christ	\$0.0 M	\$0.0 M	\$5.0 M	\$5.0 M
Lincoln Christian Univ.	“	\$0.0 M	\$0.0 M	\$4.5 M	\$4.5 M
Lipscomb Univ.	“	\$1.4 M	\$0.0 M	\$49.4 M	\$50.8 M
Lubbock Christian Univ.	“	\$0.0 M	\$0.0 M	\$14.7 M	\$14.7 M
Mid-Atlantic Christian Univ.	“	\$0.0 M	\$0.0 M	\$1.7 M	\$1.7 M
Mid-South Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.0 M	\$0.0 M
Milligan Coll.	“	\$0.0 M	\$0.0 M	\$10.6 M	\$10.6 M
Nations Univ.	“	NA	NA	NA	NA
Ohio Valley Univ.	“	\$0.5 M	\$0.0 M	\$3.3 M	\$3.8 M
Oklahoma Christian Univ.	“	\$0.0 M	\$0.0 M	\$13.3 M	\$13.3 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Ozark Christian Coll.	Churches of Christ	\$0.0 M	\$0.0 M	\$2.8 M	\$2.8 M
Pepperdine Univ.	“	\$1.5 M	\$0.0 M	\$130.2 M	\$131.7 M
Point Univ.	“	\$0.0 M	\$0.0 M	\$11.3 M	\$11.3 M
Rochester Coll.	“	\$0.0 M	\$0.0 M	\$9.3 M	\$9.3 M
Saint Louis Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.5 M	\$0.5 M
Southwest. Christian Coll.	“	\$0.8 M	\$0.0 M	\$0.7 M	\$1.5 M
Summit Christian Coll.	“	NA	NA	NA	NA
York Coll. (Nebraska)	“	\$0.5 M	\$0.0 M	\$3.7 M	\$4.2 M
Ohio Christian Univ.	Churches of Christ – Christian Union	\$0.0 M	\$0.0 M	\$41.2 M	\$41.2 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Bethel Univ.	Cumberland Presbyterian	\$0.1 M	\$0.0 M	\$33.3 M	\$33.4 M
Barton Coll.	Disciples of Christ	\$0.0 M	\$0.0 M	\$11.2 M	\$11.2 M
Bethany Coll.	"	\$0.0 M	\$0.0 M	\$6.4 M	\$6.4 M
Chapman Univ.	"	\$6.5 M	\$0.0 M	\$120.1 M	\$126.6 M
Christian Theological Seminary	"	\$0.0 M	\$0.0 M	\$0.7 M	\$0.7 M
Columbia Coll.	"	\$1.4 M	\$0.0 M	\$3.0 M	\$4.4 M
Culver-Stockton Coll.	"	\$0.0 M	\$0.0 M	\$9.7 M	\$9.7 M
Drury Univ.	"	\$0.4 M	\$0.0 M	\$21.4 M	\$21.8 M
Eureka Coll.	"	\$0.0 M	\$0.0 M	\$4.8 M	\$4.8 M
Jarvis Christian Coll.	"	\$2.7 M	\$0.0 M	\$11.5 M	\$14.2 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Lexington Theological Seminary	Disciples of Christ	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Midway Univ. Northwest Christian Univ.	“	\$0.0 M	\$0.0 M	\$10.3 M	\$10.3 M
Phillips Theological Seminary	“	\$0.0 M	\$0.0 M	\$8.4 M	\$8.4 M
Texas Christian Univ.	“	\$2.1 M	\$0.0 M	\$0.7 M	\$0.7 M
Texas Christian Univ.	“	\$2.1 M	\$0.0 M	\$61.3 M	\$63.4 M
Transylvania Univ.	“	\$0.0 M	\$0.0 M	\$6.8 M	\$6.8 M
William Woods Univ.	“	\$0.0 M	\$0.0 M	\$15.8 M	\$15.8 M
Clarkson Coll.	Episcopal – Reformed	\$0.4 M	\$0.0 M	\$11.7 M	\$12.1 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Theological Seminary of the Reformed Episcopal Church	Episcopal – Reformed	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Denver Seminary	Evangelical	\$0.0 M	\$0.0 M	\$4.3 M	\$4.3 M
Moody Bible Institute	“	NA	NA	NA	NA
Pillar Coll.	“	\$0.0 M	\$0.0 M	\$6.1 M	\$6.1 M
Veritas Coll. International Graduate School	“	NA	NA	NA	NA
World Mission Univ.	“	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Bakke Graduate Univ.	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Veritas International Univ.	Evangelical	NA	NA	NA	NA
Word of Life Bible Institute	“	\$0.0 M	\$0.0 M	\$3.1 M	\$3.1 M
Teleo Univ.	Evangelical – Protestant	NA	NA	NA	NA
Trinity Int'l Univ.-Illinois	Evangelical Free Church of Am.	\$0.0 M	\$0.0 M	\$18.4 M	\$18.4 M
Evangelical Theological Seminary	Evangelical Congregational	\$0.0 M	\$0.0 M	\$0.6 M	\$0.6 M
N. Park Univ.	Evangelical Covenant Church of America	\$0.0 M	\$0.0 M	\$22.7 M	\$22.7 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Alaska Christian Coll.	Evangelical Covenant Church of America	\$0.0 M	\$0.0 M	\$0.7 M	\$0.7 M
The King's Univ.	Gateway Church	\$0.0 M	\$0.0 M	\$4.3 M	\$4.3 M
Saint Photios Orthodox Theological Seminary	Greek Orthodox	NA	NA	NA	NA
Life Pacific Coll.	International Church of the Foursquare Gospel	\$0.0 M	\$0.0 M	\$6.3 M	\$6.3 M
Academy for Jewish Religion-Cal.	Jewish	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Am. Jewish Univ.	Jewish	\$0.0 M	\$0.0 M	\$2.0 M	\$2.0 M
Beis Medrash Heichal Dovid	"	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Gratz Coll.	"	\$0.0 M	\$0.0 M	\$0.8 M	\$0.8 M
Hebrew Theological Coll.	"	\$0.0 M	\$0.0 M	\$0.4 M	\$0.4 M
Hebrew Union Coll.	"	\$0.0 M	\$0.0 M	\$2.7 M	\$2.7 M
Jewish Theological Seminary of Am.	"	\$0.0 M	\$0.0 M	\$1.3 M	\$1.3 M
Kehilath Yakov Rabbinical Seminary	"	\$0.0 M	\$0.0 M	\$0.8 M	\$0.8 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Merказ Bnos-Bus. Sch.	Jewish	\$0.0 M	\$0.0 M	\$0.9 M	\$0.9 M
Mesivta Torah Vodaath Rabbincal Seminary	“	\$0.0 M	\$0.0 M	\$1.0 M	\$1.0 M
Mesivtha Tifereth Jerusalem of Am.	“	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Mirrer Yeshiva Centennial Inst.	“	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Ner Israel Rabbincal Coll.	“	\$0.0 M	\$0.0 M	\$0.4 M	\$0.4 M
N.Y. Medical Coll.	“	\$10.5 M	\$0.2 M	\$45.1 M	\$55.8 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Rabbinical Coll. Bobover Yeshiva Bnei Zion	Jewish	\$0.0 M	\$0.0 M	\$1.4 M	\$1.4 M
Pacific Islands Univ. (Guam)	Liebenzell Mission	NA	NA	NA	NA
Lutheran Brethren Seminary	Lutheran – Brethren of America	NA	NA	NA	NA
Tex. Lutheran Univ.	Lutheran – Evangelical	\$0.6 M	\$0.0 M	\$11.1 M	\$11.7 M
Augsburg Coll.	“	\$1.3 M	\$0.0 M	\$31.4 M	\$32.7 M
Augustana Coll.	“	\$0.2 M	\$0.0 M	\$20.5 M	\$20.7 M
Bethany Coll.	“	\$0.0 M	\$0.0 M	\$8.0 M	\$8.0 M
Cal. Lutheran Univ.	“	\$4.2 M	\$0.0 M	\$38.7 M	\$42.9 M
Capital Univ.	“	\$0.0 M	\$0.0 M	\$35.7 M	\$35.7 M
Carthage Coll.	“	\$1.3 M	\$0.0 M	\$25.8 M	\$27.1 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Concordia Coll. Alaska	Lutheran – Evangelical	\$0.0 M	\$0.0 M	\$2.9 M	\$2.8 M
Finlandia Univ.	“	\$1.1 M	\$0.0 M	\$3.8 M	\$4.9 M
Grand View Univ.	“	\$0.6 M	\$0.0 M	\$14.9 M	\$15.5 M
Lenoir-Rhyne Univ.	“	\$0.0 M	\$0.0 M	\$27.5 M	\$27.5 M
Luther Coll.	“	\$0.5 M	\$0.0 M	\$12.1 M	\$12.6 M
Luther Seminary	“	\$0.0 M	\$0.0 M	\$1.1 M	\$1.1 M
Lutheran Sch. of Theology at Chicago	“	\$0.0 M	\$0.0 M	\$0.4 M	\$0.4 M
Midland Univ.	“	\$0.8 M	\$0.0 M	\$13.3 M	\$14.1 M
Muhlenberg Coll.	“	\$0.1 M	\$0.0 M	\$13.9 M	\$14.0 M
Newberry Coll.	“	\$0.0 M	\$0.0 M	\$11.8 M	\$11.8 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Pacific Lutheran Univ. Roanoke Coll.	Lutheran – Evangelical	\$0.9 M	\$0.0 M	\$25.5 M	\$26.4 M
St. Olaf Coll.	“	\$0.0 M	\$0.0 M	\$16.6 M	\$16.6 M
Susquehanna Univ.	“	\$3.0 M	\$0.0 M	\$15.1 M	\$18.1 M
Thiel Coll.	“	\$1.0 M	\$0.0 M	\$21.8 M	\$22.8 M
Wartburg Coll.	“	\$0.0 M	\$0.0 M	\$8.9 M	\$8.9 M
Wartburg Theological Seminary	“	\$0.2 M	\$0.0 M	\$10.7 M	\$10.9 M
Wartburg Theological Seminary	“	\$0.0 M	\$0.0 M	\$0.4 M	\$0.4 M
Wittenberg Univ.	“	\$0.6 M	\$0.0 M	\$18.1 M	\$18.7 M
Bethany Lutheran Coll.	“	\$0.6 M	\$0.0 M	\$3.3 M	\$3.3 M
Free Lutheran Bible Coll. and Seminary	Lutheran – Free	NA	NA	NA	NA

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Free Lutheran Bible Coll. and Sem	Lutheran – Free	NA	NA	NA	NA
Concordia Coll.-N.Y.	Lutheran – Mo. Synod	\$0.0 M	\$0.0 M	\$11.2 M	\$11.2 M
Concordia Seminary	“	\$0.0 M	\$0.0 M	\$0.6 M	\$0.6 M
Concordia Theological Seminary	“	\$0.0 M	\$0.0 M	\$0.9 M	\$0.9 M
Concordia Univ.-Chicago	“	\$0.0 M	\$0.0 M	\$39.2 M	\$39.2 M
Concordia Univ.-Irvine	“	\$0.0 M	\$0.0 M	\$35.8 M	\$35.8 M
Concordia Univ.-Nebraska	“	\$0.0 M	\$0.0 M	\$16.0 M	\$16.0 M
Concordia Univ.-Saint Paul	“	\$0.0 M	\$0.0 M	\$38.4 M	\$38.4 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Concordia Univ.-Texas	Lutheran – Mo. Synod	\$0.0 M	\$0.0 M	\$27.8 M	\$27.8 M
Concordia Univ.-Wisconsin	“	\$0.5 M	\$0.0 M	\$64.5 M	\$65.0 M
Concordia Coll.-Ann Arbor	“	NA	NA	NA	NA
Concordia Univ.-Portland	“	\$0.0 M	\$0.0 M	\$68.3 M	\$68.3 M
Institute of Lutheran Theology	Lutheran – Pan	NA	NA	NA	NA
Valparaiso Univ.	Lutheran Church in Am.	\$0.4 M	\$0.0 M	\$34.8 M	\$35.2 M
Wagner Coll.	“	\$0.0 M	\$0.0 M	\$19.6 M	\$19.6 M
Bethel Coll.	Mennonite	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Bluffton Univ.	“	\$0.0 M	\$0.0 M	\$8.2 M	\$8.2 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Eastern Mennonite Univ.	Mennonite	\$1.2 M	\$0.0 M	\$10.0 M	\$11.2 M
Goshen Coll.	“	\$0.0 M	\$0.0 M	\$5.9 M	\$5.9 M
Hesston Coll.	“	\$0.0 M	\$0.0 M	\$3.3 M	\$3.3 M
Huntington Univ.	“	\$0.0 M	\$0.0 M	\$12.6 M	\$12.6 M
Rosedale Bible Coll.	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M
Columbia Bible Coll.	“	NA	NA	NA	NA
Fresno Pacific Univ.	Mennonite Brethren	\$0.5 M	\$0.0 M	\$42.3 M	\$42.8 M
Tabor Coll.	Mennonite Brethren	\$0.0 M	\$0.0 M	\$6.0 M	\$6.0 M
Hobe Sound Bible Coll.	Methodist – General	\$0.0 M	\$0.0 M	\$0.4 M	\$0.4 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Methodist Theological Seminary in America	Methodist – General	NA	NA	NA	NA
Penn View Bible Institute	“	NA	NA	NA	NA
Allegheny Wesleyan Coll.	Methodist – Allegheny Wesleyan Connection	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Lane Coll.	Methodist – Christian Episcopal	\$3.4 M	\$0.0 M	\$14.5 M	\$17.9 M
Miles Coll.	“	\$3.6 M	\$0.0 M	\$22.3 M	\$25.9 M
Texas Coll.	“	\$2.1 M	\$0.0 M	\$10.3 M	\$12.4 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
UnityPoint Health-Des Moines Sch. of Radiologic Tech.	Methodist – Christian Episcopal	\$0.0 M	\$0.5 M	\$0.1 M	\$0.6 M
Central Christian Coll. of Kan.	Methodist – Free	\$0.0 M	\$0.0 M	\$7.2 M	\$7.2 M
Greenville Univ.	“	\$1.1 M	\$0.0 M	\$11.0 M	\$12.1 M
Roberts Wesleyan Coll.	“	\$0.0 M	\$0.0 M	\$19.5 M	\$19.5 M
Seattle Pacific Univ.	“	\$0.6 M	\$0.0 M	\$32.5 M	\$33.1 M
Adrian Coll.	Methodist – United	\$0.3 M	\$0.0 M	\$18.3 M	\$18.6 M
Allegheny Coll.	“	\$1.4 M	\$0.0 M	\$15.0 M	\$16.4 M
American Univ.	“	\$14.0 M	\$3.9 M	\$166.3 M	\$184.2 M
Birmingham Southern Coll.	“	\$0.0 M	\$0.0 M	\$8.7 M	\$8.7 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Brevard Coll.	Methodist – United	\$0.0 M	\$0.0 M	\$5.8 M	\$5.8 M
Clark Atlanta Univ.	“	\$16.1 M	\$0.0 M	\$86.8 M	\$102.9 M
Cornell Coll.	“	\$0.5 M	\$0.0 M	\$7.5 M	\$8.0 M
Dakota Wesleyan Univ.	“	\$0.6 M	\$0.0 M	\$7.1 M	\$7.7 M
Dillard Univ.	“	\$3.6 M	\$0.0 M	\$18.5 M	\$22.1 M
Florida Southern Coll.	“	\$0.0 M	\$0.0 M	\$26.6 M	\$26.6 M
Hamline Univ.	“	\$0.6 M	\$0.0 M	\$30.8 M	\$31.4 M
Hendrix Coll.	“	\$1.2 M	\$0.0 M	\$7.7 M	\$8.9 M
High Point Univ.	“	\$1.9 M	\$0.0 M	\$50.5 M	\$52.4 M
Kansas Wesleyan Univ.	“	\$0.0 M	\$0.0 M	\$8.9 M	\$8.9 M
Kentucky. Wesleyan Coll.	“	\$0.4 M	\$0.0 M	\$5.7 M	\$6.1 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Lindsey Wilson Coll.	Methodist – United	\$0.0 M	\$0.0 M	\$24.8 M	\$24.8 M
Louisburg Coll.	“	\$0.0 M	\$0.0 M	\$9.0 M	\$9.0 M
McKendree Univ.	“	\$0.0 M	\$0.0 M	\$18.5 M	\$18.5 M
McMurry Univ.	“	\$0.8 M	\$0.0 M	\$9.9 M	\$10.7 M
Morningside Coll.	“	\$0.0 M	\$0.0 M	\$13.5 M	\$13.5 M
Nebraska Wesleyan Univ.	“	\$0.0 M	\$0.0 M	\$16.1 M	\$16.1 M
Ohio Wesleyan Univ.	“	\$0.5 M	\$0.0 M	\$12.1 M	\$12.6 M
Oklahoma City Univ.	“	\$0.2 M	\$0.0 M	\$33.3 M	\$33.5 M
Otterbein Univ.	“	\$0.0 M	\$0.0 M	\$23.3 M	\$23.3 M
Paine Coll.	“	\$2.7 M	\$0.0 M	\$4.6 M	\$7.3 M
Pfeiffer Univ.	“	\$1.8 M	\$0.0 M	\$14.0 M	\$15.8 M
Reinhardt Univ.	“	\$0.0 M	\$0.0 M	\$12.6 M	\$12.6 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Shenandoah Univ.	Methodist – United	\$0.2 M	\$0.0 M	\$50.3 M	\$50.5 M
Southern Methodist Univ.	“	\$13.7 M	\$5.8 M	\$82.4 M	\$101.9 M
Tennessee Wesleyan Univ.	“	\$0.4 M	\$0.0 M	\$7.2 M	\$7.6 M
Texas Wesleyan Univ.	“	\$1.7 M	\$0.0 M	\$29.2 M	\$30.9 M
Union Coll.	“	NA	NA	NA	NA
Univ. of Indianapolis	“	\$0.6 M	\$0.0 M	\$56.5 M	\$57.1 M
Va. Wesleyan Coll.	“	\$0.0 M	\$0.0 M	\$15.6 M	\$15.6 M
Wesley Coll.	“	\$0.3 M	\$0.0 M	\$17.3 M	\$17.6 M
Wiley Coll.	“	\$2.7 M	\$0.0 M	\$9.7 M	\$12.4 M
Wofford Coll.	“	\$0.0 M	\$0.0 M	\$8.9 M	\$8.9 M
Houghton Coll.	Methodist – Wesleyan	\$0.0 M	\$0.0 M	\$8.3 M	\$8.3 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Indiana Wesleyan Univ.	Methodist – Wesleyan	\$1.4 M	\$0.0 M	\$139.0 M	\$140.4 M
Kingswood Univ.	“	NA	NA	NA	NA
Oklahoma Wesleyan Univ.	“	\$0.0 M	\$0.0 M	\$13.1 M	\$13.1 M
Southern Wesleyan Univ.	“	\$0.2 M	\$0.0 M	\$14.0 M	\$14.2 M
DePauw Univ.	Methodist – Episcopal	\$0.0 M	\$0.0 M	\$12.8 M	\$12.8 M
Moravian Coll.	Moravian	\$0.0 M	\$0.0 M	\$24.0 M	\$24.0 M
Salem Coll.	“	\$0.0 M	\$0.0 M	\$7.9 M	\$7.9 M
Nehemiah Gateway Univ.	Nehemiah Gateway	NA	NA	NA	NA
Alaska Bible Coll.	Non-denominational	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
America Evangelical Univ.	Non-denominational	NA	NA	NA	NA
American Univ. of Health Sciences	“	NA	NA	NA	NA
Appalachian Bible Coll.	“	\$0.0 M	\$0.0 M	\$0.8 M	\$0.8 M
Arizona Christian Univ.	“	\$0.0 M	\$0.0 M	\$5.7 M	\$5.7 M
Asbury Theological Seminary	“	\$0.0 M	\$0.0 M	\$6.2 M	\$6.2 M
Athens Coll. of Ministry	“	NA	NA	NA	NA
Azusa Pacific Univ.	“	\$2.8 M	\$0.0 M	\$162.5 M	\$165.3 M
Belmont Univ.	“	\$0.0 M	\$0.0 M	\$99.4 M	\$99.4 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Berkeley Christian Coll. and Seminary	Non-denominational	NA	NA	NA	NA
Bethany Global Univ.	“	\$0.0 M	\$0.0 M	\$2.0 M	\$2.0 M
Bethesda Univ.	“	\$0.0 M	\$0.0 M	\$1.3 M	\$1.3 M
Bethlehem Coll. and Seminary	“	NA	NA	NA	NA
Beulah Heights Univ.	“	\$0.0 M	\$0.0 M	\$4.3 M	\$4.3 M
Biblical Life Institute	“	NA	NA	NA	NA
Bob Jones Univ.	“	NA	NA	NA	NA
Brookes Bible Coll.	“	NA	NA	NA	NA
Bryan Coll.-Dayton	“	\$0.0 M	\$0.0 M	\$6.3 M	\$6.30 M

## 50a

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
California Arts Univ.	Non-denominational	NA	NA	NA	NA
California Pacific School of Theology	“	NA	NA	NA	NA
California Victor Univ.	“	NA	NA	NA	NA
Cairn Univ.-Langhorne	“	\$0.0 M	\$0.0 M	\$7.6 M	\$7.6 M
Calvary Chapel Univ.	“	NA	NA	NA	NA
Calvary Univ.	“	\$0.0 M	\$0.0 M	\$1.5 M	\$1.5 M
Carolina Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.8 M	\$0.8 M
Caroline Univ.	“	NA	NA	NA	NA
Carver Baptist Bible Coll.	“	NA	NA	NA	NA

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Champion Christian Coll.	Non-denominational	NA	NA	NA	NA
Charlotte Christian Coll. and Theological Seminary	“	\$0.0 M	\$0.0 M	\$0.7 M	\$0.7 M
Christ Mission Coll.	“	NA	NA	NA	NA
Christian Leaders Coll.	“	NA	NA	NA	NA
Coll. of Biblical Studies-Houston	“	\$0.0 M	\$0.0 M	\$2.2 M	\$2.2 M
Columbia International Univ.	“	\$0.0 M	\$0.0 M	\$7.1 M	\$7.1 M
Community Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Cornerstone Univ.	Non-denominational	\$0.0 M	\$0.0 M	\$16.0 M	\$16.0M
Crown College of the Bible	“	NA	NA	NA	NA
Daybreak Univ.	“	NA	NA	NA	NA
Ecclesia Coll.	“	\$0.0 M	\$0.0 M	\$1.3 M	\$1.3 M
Elim Bible Institute & College	“	\$0.0 M	\$0.0 M	\$0.7 M	\$0.7 M
Epic Bible Coll.	“	\$0.0 M	\$0.0 M	\$1.2 M	\$1.2 M
Eternity Bible Coll.	“	NA	NA	NA	NA
Ezra Univ.	“	NA	NA	NA	NA
Faith Bible Coll.	“	NA	NA	NA	NA
Faith Bible Coll. International	“	NA	NA	NA	NA

## 53a

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Faith Bible Seminary	Non-denominational	NA	NA	NA	NA
Faith Theological Seminary	“	\$0.0 M	\$0.0 M	\$0.5 M	\$0.5 M
Family of Faith Christian Univ.	“	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Fuller Theological Seminary in Cal.	“	\$0.0 M	\$0.0 M	\$9.3 M	\$9.3 M
Gather 4 Him Christian Coll.	“	NA	NA	NA	NA
Georgia Central Univ.	“	NA	NA	NA	NA
God's Bible Sch. & Coll.	“	\$0.0 M	\$0.0 M	\$0.7 M	\$0.7 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Gordon Coll.	Non-denominational	\$0.0 M	\$0.0 M	\$12.4 M	\$12.4 M
Grace School of Theology	“	\$0.0 M	\$0.0 M	\$0.5 M	\$0.5 M
Grace Mission Univ.	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M
Grand Canyon Univ.	“	NA	NA	NA	NA
Gutenberg Coll.	“	NA	NA	NA	NA
Haven Univ.	“	NA	NA	NA	NA
Hayfield Univ.	“	NA	NA	NA	NA
Heartland Christian Coll.	“	NA	NA	NA	NA
Horizon Univ.	“	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Hosanna Bible Coll.	“	NA	NA	NA	NA

## 55a

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Houston Graduate Sch. of Theology	Non-denominational	\$0.0 M	\$0.0 M	\$1.4 M	\$1.4 M
Hudson Taylor Univ.	“	NA	NA	NA	NA
Huntsville Bible Coll.	“	\$0.0 M	\$0.0 M	\$1.2 M	\$1.2 M
Huston-Tillotson Univ.	“	\$2.4 M	\$0.0 M	\$10.0 M	\$12.4 M
In His Image Bible Institute International	“	NA	NA	NA	NA
Indian Bible Coll.	“	NA	NA	NA	NA
International American Univ.	“	NA	NA	NA	NA

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
International Univ. & Theological Seminary	Non-denominational	NA	NA	NA	NA
Ivy Christian Coll.	“	NA	NA	NA	NA
John Witherspoon Coll.	‘	NA	NA	NA	NA
Kentucky Mountain Bible Coll.	“	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Kernel Univ.	“	NA	NA	NA	NA
Kuyper Coll.	“	\$0.0 M	\$0.0 M	\$1.1 M	\$1.1 M
Lancaster Bible Coll.	“	NA	NA	NA	NA
LeTourneau Univ.	“	\$0.0 M	\$0.0 M	\$22.2 M	\$22.2 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Liberty Univ.	Non-denominational	\$0.0 M	\$0.5 M	\$723.2 M	\$723.7 M
Manhattan Christian Coll.	“	NA	NA	NA	NA
Messiah Coll.	“	\$0.0 M	\$0.0 M	\$24.7 M	\$24.7 M
Mid-South Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.1 M	\$0.1 M
Midwest Univ.	“	NA	NA	NA	NA
Montana Bible Coll.	“	NA	NA	NA	NA
Montreat Coll.	“	\$0.0 M	\$0.0 M	\$8.6 M	\$8.6 M
Nashotah House	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M
New Coll. Franklin	“	NA	NA	NA	NA
New Hope Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.7 M	\$0.7 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
New Saint Andrews Coll.	Non-denominational	NA	NA	NA	NA
Northern California Bible Coll.	“	NA	NA	NA	NA
Northpoint Univ.	“	NA	NA	NA	NA
Oak Hills Christian Coll.	“	\$0.0 M	\$0.0 M	\$0.5 M	\$0.5 M
Omega Graduate School	“	NA	NA	NA	NA
Oral Roberts Univ.	“	\$0.0 M	\$0.0 M	\$31.7 M	\$31.7 M
Quachita Hills Coll.	“	NA	NA	NA	NA
Pacific Bible Coll.	“	NA	NA	NA	NA

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Pacific International Univ.	Non-denominational	NA	NA	NA	NA
Pacific Rim Christian Univ.	“	NA	NA	NA	NA
Pacific School of Religion	“	\$0.0 M	\$0.0 M	\$1.3 M	\$1.3 M
Patrick Henry Coll.	“	NA	NA	NA	NA
Prairie Coll.	“	NA	NA	NA	NA
Providence Christian Coll.	“	\$0.0 M	\$0.0 M	\$1.5 M	\$1.5 M
Redeemed Christian Bible Coll. and Seminary	“	NA	NA	NA	NA
Regent Univ.	“	\$0.0 M	\$0.0 M	\$116.3 M	\$116.3 M
Regional Christian Univ.	“	NA	NA	NA	NA

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Rio Grand Bible Institute	Non-denominational	NA	NA	NA	NA
Robert E. Webber Institute for Worship Studies	“	NA	NA	NA	NA
Rocky Mountain Coll.	“	NA	NA	NA	NA
Sierra States Univ.	“	NA	NA	NA	NA
South Florida Bible Coll. and Theological Seminary	“	\$0.0 M	\$0.0 M	\$0.9 M	\$0.9 M
Southern Bible Institute & Coll.	“	NA	NA	NA	NA

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Southern Evangelical Seminary	Non-denominational	NA	NA	NA	NA
St. Luke Univ.	“	NA	NA	NA	NA
Stark Coll. & Seminary	“	NA	NA	NA	NA
Taylor Univ.	“	\$0.0 M	\$0.0 M	\$12.7 M	\$12.7 M
The Bible Seminary	“	NA	NA	NA	NA
The Institute for Global Outreach Developments Int'l	“	NA	NA	NA	NA
Theological Univ. of the Caribbean (Puerto Rico)	“	NA	NA	NA	NA
Tri-State Bible Coll.	“	\$0.0 M	\$0.0 M	\$0.2 M	\$0.2 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Trinity Coll. of Florida	Non-denominational	\$0.0 M	\$0.0 M	\$1.7 M	\$1.7 M
Tyndale Theological Seminary	“	NA	NA	NA	NA
Underwood Univ.	“	NA	NA	NA	NA
Univ. of Fort Lauderdale	“	\$0.0 M	\$0.0 M	\$0.7 M	\$0.7 M
Univ. of Northwest-St Paul	“	\$0.0 M	\$0.0 M	\$17.1 M	\$17.1 M
Univ. of South Los Angeles	“	NA	NA	NA	NA
Univ. of the Pacific	“	\$3.0 M	\$2.9 M	\$155.7 M	\$161.6 M
Virginia Bible Coll.	“	NA	NA	NA	NA

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Recipient	Affiliation	Grant	Contract	Stud. Aid	Total
Virginia Christian Univ.	Non-denominational	NA	NA	NA	NA
Visible Music Coll.	“	\$0.0 M	\$0.0 M	\$1.5 M	\$1.5 M
Washington Univ. of Virginia	“	NA	NA	NA	NA
Wave Leadership Coll.	“	\$0.0 M	\$0.0 M	\$0.3 M	\$0.3 M
Western Covenant Univ.	“	NA	NA	NA	NA
Westmont Coll.	“	\$0.0 M	\$0.0 M	\$9.5 M	\$9.5 M
Wheaton Coll.	“	\$0.6 M	\$0.0 M	\$17.8 M	\$18.4 M
Whitworth Univ.	“	\$0.3 M	\$0.0 M	\$24.4 M	\$24.7 M
William Jessup Univ.	“	\$0.0 M	\$0.0 M	\$13.5 M	\$13.5 M

## 64a

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Williamson Coll.	Non-denominational	NA	NA	NA	NA
Yuin Univ.	"	NA	NA	NA	NA
Universidad Pentecostal Mizpa	Pentecostal	NA	NA	NA	NA
Vanguard Coll.	Pentecostal – Assemblies of Canada	NA	NA	NA	NA
Messenger Coll.	Pentecostal – Church of God	\$0.0 M	\$0.0 M	\$0.5 M	\$0.5 M
Heritage Bible Coll.	Pentecostal – Free Will Baptist	NA	NA	NA	NA
Emmanuel Coll.	Pentecostal – Holiness	\$0.0 M	\$0.0 M	\$8.0 M	\$8.0 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Southwest Christian Univ.	Pentecostal –Holiness	\$0.0 M	\$0.0 M	\$5.3 M	\$5.3 M
International Reformed Univ. & Seminary	Presbyterian – Korean	NA	NA	NA	NA
Presbyterian Theological Seminary in America	“	NA	NA	NA	NA
Evangelia Univ.	“	NA	NA	NA	NA
HIS Univ.	“	NA	NA	NA	NA
Oikos Univ.	“	NA	NA	NA	NA
Alma Coll.	Presbyter-ian (USA)	\$0.0 M	\$0.0 M	\$13.4 M	\$13.4 M
Austin Coll.	“	\$1.3 M	\$0.1 M	\$9.3 M	\$10.7 M
Buena Vista Univ.	“	\$0.3 M	\$0.0 M	\$19.6 M	\$19.9 M
Carroll Univ.	“	\$1.8 M	\$0.0 M	\$27.1 M	\$28.9 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Centre Coll.	Presbyterian (USA)	\$0.0 M	\$0.0 M	\$7.7 M	\$7.7 M
Coll. of the Ozarks	“	\$0.0 M	\$0.0 M	\$3.4 M	\$3.4 M
Covenant Coll.	“	\$0.0 M	\$0.0 M	\$5.3 M	\$5.3 M
Davidson Coll.	“	\$1.2 M	\$0.0 M	\$7.5 M	\$8.7 M
Davis & Elkins Coll.	“	\$1.1 M	\$0.0 M	\$6.7 M	\$7.8 M
Hastings Coll.	“	\$0.0 M	\$0.0 M	\$8.3 M	\$8.3 M
Illinois Coll.	“	\$1.0 M	\$0.0 M	\$8.3 M	\$9.3 M
King Univ.	“	\$0.0 M	\$0.0 M	\$24.4 M	\$24.4 M
Lafayette Coll.	“	\$0.3 M	\$0.0 M	\$8.4 M	\$8.7 M
Macalester Coll.	“	\$1.3 M	\$0.0 M	\$8.8 M	\$10.1 M
Queens Univ. of Charlotte	“	\$0.4 M	\$0.0 M	\$22.6 M	\$23.0 M
Univ. of Jamestown	“	\$0.0 M	\$0.0 M	\$9.2 M	\$9.2 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Univ. of the Ozarks	Presbyterian (USA)	\$0.3 M	\$0.0 M	\$3.8 M	\$4.1 M
Saint Augustine's Univ.	Protestant –Episcopal	\$4.0 M	\$0.0 M	\$13.3 M	\$17.3 M
Sewanee-The Univ. of the South	“	\$0.5 M	\$0.0 M	\$8.7 M	\$9.2 M
Voorhees Coll.	“	\$2.9 M	\$0.0 M	\$7.3 M	\$10.2 M
Barclay Coll.	Quaker	\$0.0 M	\$0.0 M	\$1.6 M	\$1.6 M
Earlham Coll.	“	\$0.4 M	\$0.0 M	\$5.9 M	\$6.3 M
George Fox Univ.	“	\$0.1 M	\$0.0 M	\$41.8 M	\$41.9 M
Guilford Coll.	“	\$0.0 M	\$0.0 M	\$12.0 M	\$12.0 M
Malone Univ.	“	\$0.0 M	\$0.0 M	\$14.6 M	\$14.6 M
William Penn Univ.	“	\$0.0 M	\$0.0 M	\$12.3 M	\$12.3 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Wilmington Coll.	Quaker	\$0.5 M	\$0.0 M	\$11.5 M	\$12.0 M
Union Bible Coll.	“	NA	NA	NA	NA
Reformed Univ.	Reformed Christian	NA	NA	NA	NA
Hope Coll.	Reformed Church in America	\$2.0 M	\$0.0 M	\$19.4 M	\$21.4 M
Northwestern Coll.	“	\$0.0 M	\$0.0 M	\$7.0 M	\$7.0 M
Alvernia Univ.	Roman Catholic	\$0.9 M	\$0.0 M	\$30.6 M	\$31.5 M
Aquinas Coll.	“	\$0.8 M	\$0.0 M	\$9.4 M	\$10.2 M
Assumption Coll.	“	\$0.2 M	\$0.0 M	\$16.7 M	\$16.9 M
Ave Maria Univ.	“	\$0.0 M	\$0.0 M	\$5.7 M	\$5.7 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Avila Univ.	Roman Catholic	\$1.6 M	\$0.0 M	\$14.4 M	\$16.0 M
Bellarmine Univ.	“	\$0.0 M	\$0.0 M	\$30.1 M	\$30.1 M
Benedictine Coll.	“	\$0.0 M	\$0.0 M	\$14.5 M	\$14.5 M
Benedictine Univ.	“	\$0.0 M	\$0.0 M	\$48.2 M	\$48.2 M
Boston Coll.	“	\$34.2 M	\$2.7 M	\$89.1 M	\$126.0 M
Brescia Univ.	“	\$0.5 M	\$0.0 M	\$9.5 M	\$10.0 M
Briar Cliff Univ.	“	\$1.2 M	\$0.0 M	\$11.0 M	\$12.2 M
Calumet Coll. Of Saint Joseph	“	\$0.0 M	\$0.0 M	\$6.2 M	\$6.2 M
Canisius Coll.	“	\$1.0 M	\$0.0 M	\$26.1 M	\$27.1 M
Cardinal Stritch Univ.	“	\$0.0 M	\$0.0 M	\$15.6 M	\$15.6 M
Carlow Univ.	“	\$0.1 M	\$0.0 M	\$24.5 M	\$24.6 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Carroll Coll.	Roman Catholic	\$0.1 M	\$0.0 M	\$8.9 M	\$9.0 M
Catholic Univ. of America	“	\$13.2 M	\$0.4 M	\$51.6 M	\$65.3 M
Chestnut Hill Coll.	“	\$0.0 M	\$0.0 M	\$20.7 M	\$20.7 M
Christian Bros. Univ.	“	\$0.0 M	\$0.0 M	\$13.1 M	\$12.7 M
Clarke Univ.	“	\$0.2 M	\$0.0 M	\$10.7 M	\$10.9 M
Coll. of the Holy Cross	“	\$0.1 M	\$0.0 M	\$17.4 M	\$17.5 M
Creighton Univ.	“	\$11.7 M	\$1.1 M	\$127.0 M	\$139.8 M
DePaul Univ.	“	\$1.0 M	\$0.0 M	\$250.3 M	\$251.3 M
Duquesne Univ.	“	\$4.4 M	\$0.0 M	\$105.5 M	\$109.9 M
Emmanuel Coll.	“	\$0.0 M	\$0.0 M	\$18.5 M	\$18.5 M
Fontbonne Univ.	“	\$0.7 M	\$0.0 M	\$8.0 M	\$8.7 M
Fordham Univ.	“	\$3.3 M	\$0.0 M	\$158.0 M	\$161.3 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Franciscan Univ. of Steubenville	Roman Catholic	\$0.0 M	\$0.0 M	\$18.5 M	\$18.5 M
Georgetown Univ.	"	\$104.4 M	\$3.1 M	\$269.8 M	\$377.3 M
Georgian Court Univ.	"	\$0.9 M	\$0.0 M	\$18.9 M	\$19.8 M
Gonzaga Univ.	"	\$0.1 M	\$0.0 M	\$60.0 M	\$60.1 M
Holy Names Univ.	"	\$1.6 M	\$0.0 M	\$9.9 M	\$11.5 M
Iona Coll.	"	\$0.0 M	\$0.0 M	\$38.8 M	\$38.8 M
John Carroll Univ.	"	\$1.2 M	\$0.0 M	\$24.0 M	\$25.2 M
King's Coll.	"	\$0.0 M	\$0.0 M	\$22.1 M	\$22.1 M
La Salle Univ.	"	\$0.2 M	\$0.0 M	\$48.6 M	\$48.8 M
Le Moyne Coll.	"	\$0.9 M	\$0.0 M	\$33.2 M	\$34.1 M
Lewis Univ.	"	\$1.0 M	\$0.0 M	\$51.4 M	\$52.4 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Loyola Marymount Univ.	Roman Catholic	\$2.9 M	\$0.0 M	\$111.0 M	\$113.9 M
Loyola Univ. Chicago	“	\$22.9 M	\$0.3 M	\$193.8 M	\$217.0 M
Loyola Univ. Los Angeles	“	NA	NA	NA	NA
Loyola Univ. New Orleans	“	\$0.5 M	\$0.0 M	\$45.6 M	\$46.1 M
Manhattan Coll.	“	\$0.0 M	\$0.0 M	\$39.8 M	\$39.8 M
Marian Univ. (Ind.)	“	\$1.0 M	\$0.7 M	\$56.4 M	\$57.4 M
Marian Univ. (Wis.)	“	\$1.0 M	\$0.7 M	\$16.0 M	\$17.7 M
Marquette Univ.	“	\$18.8 M	\$1.4 M	\$114.7 M	\$134.9 M
Marymount Cal. Univ.	“	\$0.0 M	\$0.0 M	\$8.0 M	\$8.0 M

## 73a

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Merrimack Coll.	Roman Catholic	\$0.2 M	\$0.0 M	\$35.5 M	\$35.7 M
Misericordia Univ.	“	\$0.1 M	\$0.0 M	\$26.7 M	\$26.8 M
Molloy Coll.	“	\$2.2 M	\$0.0 M	\$47.0 M	\$49.2 M
Mount Marty Coll.	“	\$0.0 M	\$0.0 M	\$9.0 M	\$9.0 M
Mount Saint Joseph Univ.	“	\$0.6 M	\$0.0 M	\$20.7 M	\$21.3 M
Mount Saint Mary Coll.	“	\$0.0 M	\$0.0 M	\$24.1 M	\$24.1 M
Mount Saint Mary's Univ.	“	\$2.9 M	\$0.0 M	\$41.7 M	\$44.6 M
Newman Univ.	“	\$0.0 M	\$0.0 M	\$13.0 M	\$13.0 M
Notre Dame Coll.	“	\$0.0 M	\$0.0 M	\$16.7 M	\$16.7 M
Notre Dame de Namur Univ.	“	\$0.3 M	\$0.0 M	\$15.6 M	\$15.9 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Ohio Dominican Univ.	Roman Catholic	\$0.0 M	\$0.0 M	\$16.5 M	\$16.5 M
Our Lady of the Lake Univ.	“	\$1.0 M	\$0.0 M	\$45.1 M	\$46.1 M
Pontifical Catholic Univ. of Puerto Rico-Ponce	“	\$2.4 M	\$0.0 M	\$110.0 M	\$112.4 M
Providence Coll.	“	\$0.4 M	\$0.0 M	\$28.0 M	\$28.4 M
Quincy Univ.	“	\$0.6 M	\$0.0 M	\$8.6 M	\$9.2 M
Sacred Heart Univ.	“	\$1.0 M	\$0.0 M	\$78.7 M	\$79.7 M
Saint Joseph's Univ.	“	\$2.8 M	\$0.0 M	\$59.5 M	\$62.3 M
Saint Louis Univ.	“	\$26.0 M	\$4.6 M	\$111.9 M	\$142.5 M
Saint Martin's Univ.	“	\$0.1 M	\$0.0 M	\$12.5 M	\$12.6 M

## 75a

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Saint Mary's Coll. Of California	Roman Catholic	\$0.8 M	\$0.0 M	\$39.1 M	\$39.9 M
Saint Mary's Univ. of Minn.	"	\$0.7 M	\$2.1 M	\$43.7 M	\$46.5 M
Saint Norbert Coll.	"	\$0.0 M	\$0.0 M	\$15.5 M	\$15.5 M
Saint Peter's Univ.	"	\$2.5 M	\$0.0 M	\$32.6 M	\$35.1 M
Saint Vincent Coll.	"	\$0.3 M	\$0.0 M	\$18.8 M	\$19.1 M
Saint Xavier Univ.	"	\$2.3 M	\$0.0 M	\$31.3 M	\$33.6 M
Santa Clara Univ.	"	\$2.6 M	\$0.0 M	\$59.3 M	\$61.9 M
Seattle Univ.	"	\$1.8 M	\$0.0 M	\$67.6 M	\$69.4 M
Seton Hill Univ.	"	\$0.3 M	\$0.0 M	\$21.6 M	\$21.9 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Siena Heights Univ.	Roman Catholic	\$1.4 M	\$0.0 M	\$19.9 M	\$21.3 M
Spring Hill Coll.	“	\$0.0 M	\$0.1 M	\$12.7 M	\$12.7 M
St. Bonaventure Univ.	“	\$0.3 M	\$0.0 M	\$17.8 M	\$18.1 M
St. Catherine Univ.	“	\$2.1 M	\$0.0 M	\$47.8 M	\$49.9 M
St. John's Univ.- N.Y.	“	\$3.7 M	\$0.0 M	\$184.3 M	\$188.0 M
St. Mary's Univ. Stonehill Coll.	“	\$4.0 M	\$0.0 M	\$45.9 M	\$49.9 M
Thomas More Coll.	“	\$0.0 M	\$0.0 M	\$18.7 M	\$18.7 M
Univ. of Dallas	“	\$0.0 M	\$0.0 M	\$14.1 M	\$14.1 M
Univ. of Dayton	“	\$14.8 M	\$0.0 M	\$17.9 M	\$17.9 M
			\$111.7 M	\$65.7 M	\$192.2 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Univ. of Detroit Mercy	Roman Catholic	\$7.3 M	\$0.6 M	\$85.8 M	\$93.7 M
Univ. of Mary	“	\$1.4 M	\$0.0 M	\$27.0 M	\$28.4 M
Univ. of Notre Dame	“	\$74.4 M	\$7.6 M	\$64.8 M	\$146.8 M
Univ. of Portland	“	\$0.0 M	\$0.0 M	\$33.9 M	\$33.9 M
Univ. of Saint Francis-Fort Wayne	“	\$0.3 M	\$0.0 M	\$20.9 M	\$21.2 M
Univ. of Saint Mary	“	\$0.1 M	\$0.0 M	\$15.6 M	\$15.7 M
Univ. of San Diego	“	\$3.0 M	\$0.6 M	\$111.2 M	\$114.8 M
Univ. of San Francisco	“	\$0.3 M	\$0.0 M	\$123.0 M	\$123.3 M
Univ. of St Francis	“	\$0.8 M	\$0.0 M	\$27.3 M	\$28.1 M

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Univ. of St Thomas (Texas)	Roman Catholic	\$1.7 M	\$0.3 M	\$22.1 M	\$24.1 M
Univ. of St Thomas (Minnesota)	“	\$1.7 M	\$0.3 M	\$63.3 M	\$65.3 M
Ursuline Coll.	“	\$0.0 M	\$0.0 M	\$12.7 M	\$12.7 M
Villanova Univ.	“	\$4.6 M	\$0.0 M	\$66.5 M	\$71.1 M
Walsh Univ.	“	\$0.0 M	\$0.0 M	\$22.2 M	\$22.2 M
Xavier Univ. of La.	“	\$26.6 M	\$0.0 M	\$52.5 M	\$79.1 M
Andrews Univ.	Seventh-day Adventist	\$0.3 M	\$0.0 M	\$27.8 M	\$28.1 M
Advent-Health Univ.	“	NA	NA	NA	NA
Atlantic Union Coll.	“	NA	NA	NA	NA
Burman Univ.	“	NA	NA	NA	NA

## 79a

<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Kettering Coll.	Seventh-day Adventist	\$0.0 M	\$0.0 M	\$13.3 M	\$13.3 M
La Sierra Univ.	“	\$0.5 M	\$0.0 M	\$23.0 M	\$23.5 M
Loma Linda Univ.	“	\$12.4 M	\$9.9 M	\$117.7 M	\$139.9 M
Oakwood Univ.	“	\$3.7 M	\$0.0 M	\$17.6 M	\$21.3 M
Pacific Union Coll.	“	\$0.0 M	\$0.0 M	\$11.0 M	\$11.0 M
Southern Adventist Univ.	“	\$0.0 M	\$0.0 M	\$21.6 M	\$21.6 M
Southwestern Adventist Univ.	“	\$0.0 M	\$0.0 M	\$7.9 M	\$7.9 M
Union Coll.	“	NA	NA	NA	NA
Walla Walla Univ.	“	\$1.1 M	\$0.0 M	\$11.4 M	\$12.5 M
Washington Adventist Univ.	“	\$0.0 M	\$0.0 M	\$10.2 M	\$10.2 M

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<b>Recipient</b>	<b>Affiliation</b>	<b>Grant</b>	<b>Contract</b>	<b>Stud. Aid</b>	<b>Total</b>
Piedmont Coll.	United Church of Christ	\$0.0 M	\$0.0 M	\$27.2 M	\$27.2 M
Rocky Mountain Coll.	United Church of Christ	\$0.3 M	\$0.0 M	\$11.5 M	\$11.8 M
Valor Christian Coll.	World Harvest Church	NA	NA	NA	NA

<b>Totals:</b>		\$706.9 M	\$164.0 M	\$12.3 B	\$13.3 B
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