

FREEDOM FROM RELIGION *foundation*

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July 20, 2016

**SENT VIA EMAIL AND U.S. MAIL:
rschottke@grovecityohio.gov**

The Honorable Roby Schottke
City Council President
City Hall
4035 Broadway
Grove City, OH 43123

Re: Religious Scholarships

Dear Mr. Schottke:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding unconstitutional scholarships offered by Grove City. FFRF is a national nonprofit organization with nearly 24,000 members across the country, including more than 600 in Ohio. FFRF's purpose is to protect the separation between state and church.

It is our understanding that Grove City offers its residents scholarships to attend Ohio Christian University's (OCU) local campus, at the Grove City Church of the Nazarene, as part of the Grove City Higher Education Investment Program.

Scholarships from Grove City to attend OCU violate both the Ohio State Constitution and the U.S. Constitution. We are writing to request assurances that Grove City will not award any scholarships to OCU in the future.

Besides its location in a Christian church, we understand that OCU's Grove City campus offers adult and graduate studies, including a B.A. in Leadership and Ministry. This pastoral degree requires many courses in Christian theology and teaches students to "demonstrate skills in communicating the gospel in a variety of contexts and to various audiences."¹

OCU not only trains students to become ministers, but also mixes the promotion of Christianity with its secular studies. For example:

- Students who pursue a B.S. in Nursing are taught to "deliver holistic Christian care," with required courses that include "Christian Excellence," "Introduction to Theology," and "Christian Servant Leadership for Nursing."

¹ http://www.ohiochristian.edu/adult-graduate-studies/bachelor-arts_/leadership-ministry.

Students also must take an ethics course, where “Christian Ethics will be the primary focus.”²

- Students who pursue an Associate’s Degree in either Business or Human Services must take “a core of Bible/Christian Worldview classes,” including three separate three-credit bible studies, which the school asserts “ensures this education is morally and ethically grounded.”³
- Students who pursue a B.A. in English are expected to “develop an ability to think clearly, logically, critically, and creatively in the light of Biblical truth and divine creation,” and to “formulate a Biblically based and Christ-centered outlook on language”⁴
- Students who pursue a B.A. in Political Science must take a “Christian Excellence” class, are taught “an ethical vision of government action within the framework of a Christian worldview,” and are expected to “critically examine concepts and theories regarding the interaction of faith and Political Science.”⁵

Scholarships to OCU are guaranteed to fund religious instruction, regardless of what degree the student pursues. The school’s mission is to prepare students “to serve effectively in the church and society by providing a holistic, Christ-centered, biblically integrated education in the Wesleyan tradition,” and its vision is to prepare “world-impacting Christian servant leaders.”⁶ *All* graduates are expected to “articulate a Christian worldview,” to “confirm an understanding of a saving and sanctifying knowledge of God through Jesus Christ as Savior and Lord,” to “affirm the Bible as the only infallible guide for Christian faith and practice,” to “demonstrate God’s love for humanity through a selfless life that seeks to reconcile the world to Christ,” and to “apply Bible-based moral values in their daily life.”⁷

It is unconstitutional for Grove City to use taxpayer funds to subsidize religious instruction at OCU. First, the Ohio Constitution prohibits compelling taxpayers to fund religious education: “No person shall be compelled to attend, erect, or support any place of worship, or to maintain any form of worship, against his consent; and no preference shall be given, by law, to any religious society” Ohio Const. art. I, § 7. Supporting a form of worship, and showing preference for Christianity above other religions, is exactly what Grove City does by giving taxpayer-funded scholarships to students to attend OCU.

² http://www.ohiochristian.edu/adult-graduate-studies/bachelor-science_/bachelor-science-nursing.

³ http://www.ohiochristian.edu/adult-graduate-studies/associate-arts_/business;
http://www.ohiochristian.edu/adult-graduate-studies/associate-arts_/human-services.

⁴ http://www.ohiochristian.edu/adult-graduate-online/bachelor-arts_/english.

⁵ http://www.ohiochristian.edu/adult-graduate-online/bachelor-arts_/political-science.

⁶ <http://www.ohiochristian.edu/about/mission>.

⁷ *Id.*

Second, the Establishment Clause strictly prohibits the government from advancing religion. This means that the government may not “aid any or all religious faiths or sects in the dissemination of their doctrines.” *McCullum v. Bd. of Educ.*, 333 U.S. 203 (1948).

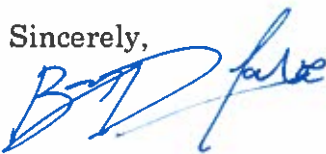
The Supreme Court has struck down grants to parochial schools when there is a possibility that the funds will be used to advance religion. *See Comm. for Pub. Educ. v. Nyquist*, 413 U.S. 756, 777 (1973) (striking down repair grants meant to renovate parochial schools because the buildings were used for sectarian purposes); *Lemon v. Kurtzman*, 403 U.S. 602, 625 (1971) (holding that government aid to nonpublic education impermissibly entangled the government with religion, even when limited to secular subjects). A scholarship has the same effect as a direct grant, giving taxpayer funds directly to the school. At OCU, as discussed above, religious promotion is guaranteed to be a part of the education.

The Supreme Court has also upheld statutes prohibiting public aid to students pursuing degrees in theology. *See Locke v. Davey*, 540 U.S. 712, 720 n.3 (2004) (rejecting a student’s argument that state scholarships that were unavailable to majors in “pastoral ministries” were “an unconstitutional viewpoint restriction on speech” because “the Scholarship Program is not a forum for speech . . . cases dealing with speech forums are simply inapplicable”). Private universities that offer no truly secular degrees are not entitled to participate in government funds.

Funding scholarships to a private religious university that grants pastoral ministry degrees—one of only three options—is a far cry from Ohio’s EdChoice voucher program, which exists only to allow low-income families to transfer their children from a failing public school to any of a large number of private schools that provide K–12 education. *See Zelman v. Simmons-Harris*, 536 U.S. 639 (2002) (upholding Cleveland’s pilot voucher program).

FFRF requests written assurances that Grove City will not fund scholarships to OCU as part of the Grove City Higher Education Investment Program. Please respond in writing with the steps taken to resolve this matter so that we may notify our complainant.

Sincerely,



Ryan D. Jayne, Esq.
Diane Uhl Legal Fellow
Freedom From Religion Foundation

cc: City Council members, *via* comments@grovecityohio.gov