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March 19, 2024

Kevin E. Bryant
Deputy Director, Office of Directives Management
US Department of State
600 19th Street, NW
Washington, DC 20036

Submitted electronically via www.regulations.gov.

**RE: Nondiscrimination in Foreign Assistance
RIN 1400–AF66 and 1400-AF65
Docket ID DOS-2023-0015 and DOS-2023-0014**

Dear Director Bryant,

Christian Connections for International Health (CCIH) is a global network of Christian organizations and individuals committed to advancing health and wholeness. Motivated by our Christian faith and our values, CCIH envisions a world where all have access to quality healthcare and prevention services.

Our membership includes over 110 organizations and affiliates, plus hundreds of individuals who work in over 90 countries globally. These members include non-governmental organizations, church networks, Christian Health Associations, volunteer and product donation agencies, and other support organizations. CCIH works with Protestant, Catholic, and non-denominational organizations as well as interfaith networks.

As Executive Director, I am reminded nearly every day that each of these individuals and organizations face challenges that are unique to their circumstances from contexts influenced by geography, ethnicity, culture, and historical background. I am also encouraged that each of these differences makes us unique and provides a perspective that problem-solving needs to be flexible and take into account multiple different views.

I applaud the overarching purpose of championing a policy that encourages non-discrimination. We are all equal in the eyes of God and deserving of his love and grace. However, I have some significant reservations about the use of this regulation as a blunt instrument that does not take into account local contexts and how the lack of a uniform review could lead to uneven outcomes should this regulation become official.

For example, counter to concerns for public health programs and protections for human rights, there are countries in Sub-Saharan Africa that are legislating against members of the LGBT community. The current text of the anti-discrimination policy does not take these new laws into account, nor is there a uniform policy to qualify for an exemption. Simply complying with local laws could result in disqualification of valuable organizations that provide vital services from receiving international assistance.

Another unanticipated consequence of the policy could occur in countries where a retirement age is mandatory. Again, while the anti-discrimination policy may count age as another arbitrary factor in employment, many countries may have reasons behind their rules. This proposed regulation does not take this into account.


CCIH members routinely ensure that all members of the community, regardless of who they are, receive affordable, equitable, and quality services. This includes providing care to key populations that have been marginalized through social and economic stigmas, and are the very types of organizations that have been underutilized through localization efforts through the years. We do not have evidence to demonstrate that regulations such as this will improve upon their successful track records.

Finally, as USAID rolls out strategies like [Building Bridges](#) to expand opportunities for smaller, local, faith-based organizations to partner in the cause of building sustainable health programs, new regulations like this may discourage people of faith from working with the US government. These and other effects should be considered prior to this policy being adopted and implemented.

We appreciate the efforts of the Department of State to improve equitable employment and access to services. It is my hope that the State Department will continue to view the faith-based community as vital to the success of foreign assistance programs, especially those in global health.

Sincerely,

Doug Fountain

A handwritten signature in blue ink that reads "Douglas Fountain". The signature is written in a cursive style with a long, sweeping underline.

Executive Director