



ADVANCING AMERICAN FREEDOM

Below are comments from Advancing American Freedom (AAF) on the U.S. Department of State's proposed rule, "Nondiscrimination in Foreign Assistance," published January 19, 2024.

Introduction

AAF is a 501(c)(4) non-profit organization that advocates for conservative values and policies by developing innovative policy solutions, strategies, coalitions, and messaging that build upon the accomplishments of the last administration and expand freedom for all Americans.

AAF seeks to promote government policies that align with our belief that all human beings have the right to life, liberty, and the pursuit of happiness. The Notice of Proposed Rulemaking (NPRM) put forth by the U.S. Department of State revises conditions on foreign aid distributed by the U.S. We believe that the NPRM pushes harmful practices and ideology that would impair human flourishing. We believe that it will negatively hurt religious organizations and further the damage done by the Biden administration regarding our relationships with other countries at a time when we need strong connections.

Cultural Imposition

One fear that we have if this NPRM goes into effect would be its impact on other countries' cultures. This rule would impose the American left's preferred social framework and perspective onto other nations by forcing countries that are reliant on U.S. funding to conform to the belief structures of the secular American left.

For example, if the United States offers financial or material assistance for healthcare services to a nation, and that nation declines to allocate such aid towards abortions, contraceptives, or so-called "gender-affirming care," this NPRM grants the State Department the power to cut off the provision of awarded assistance to that nation. Sadly, this means that the United States would cease providing aid to an ally in need solely due to its refusal to adhere to modern progressive moral standards. The Biden administration counts violating the right to life of unborn children and promoting surgeries that mutilate confused youth as non-negotiable moral priorities, a sad commentary on their authority.

Leftist ideology purportedly opposes powerful nations forcing their social agendas on unwilling cultures. However, in this NPRM we see the Biden administration ignoring its own supposed principles to do just that and threaten any dissent with loss of U.S. funding.

Already other countries feel an unwanted ideological agenda being forced upon them through U.S. foreign policy. This is not something we want to perpetuate. We at AAF are opposed to cutting off aid for countries simply because they refuse to adhere to the radical left's woke values.

Discriminating Against Faith-Based Partner Organizations

The United States government has a longstanding relationship with faith-based organizations. These organizations are uniquely able to serve those in need, as religious beliefs are often a leading motivator in humanitarian work. They have also proven to be effective in partnering with the government to achieve key policy goals.

President Obama, whom President Biden previously served with as Vice President, said that “no matter how much money we invest or how sensibly we design our policies, the change that Americans are looking for will not come from government alone. There is a force for good greater than government. It is an expression of faith, this yearning to give back, this hunger for a purpose larger than our own, that reveals itself not simply in places of worship, but in senior centers and shelters, schools and hospitals, and any place an American decides.”¹

Over the past two decades, these partnerships have proven to be so beneficial that both Republican and Democrat administrations have instituted a White House office and various federal agency centers specifically focused on these relationships. What will happen to the White House Office of Faith-Based and Neighborhood Partnerships if faith-based organizations are unable to continue successful partnerships that align with their moral convictions? If these crucial organizations are forced to support causes that go against their religious beliefs, they will choose not to partner with the government and thus lose access to government funding. A lack of funding will inevitably result in a less effective or nonexistent faith-based organization. This would harm religious organizations rather than fulfill the Office's mission of enabling them to thrive.

In 2018, the city of Philadelphia refused to continue a partnership with Catholic Social Services (CSS), which was working to connect foster children with families. This change was made because of CSS's religious beliefs that children thrive best in homes with a married couple of one man and one woman. CSS sued the city of Philadelphia on the basis of the First Amendment right to religious freedom. A lower court denied CSS's motion for a preliminary injunction and the case was moved to the Supreme Court (Fulton v. City of Philadelphia) where the court ruled unanimously that the city of Philadelphia's refusal to contract with CSS for foster care services was indeed a violation of the First Amendment.

¹<https://obamawhitehouse.archives.gov/the-press-office/obama-announces-white-house-office-faith-based-and-neighborhood-partnerships>

The Constitution protects religious organizations under the First Amendment. Historically, the federal government has worked to structure partnerships in a way that aligns with these organizations' respective religious missions. This NPRM goes against the Constitution, as it violates religious freedom. A rule designed to encourage "nondiscrimination in foreign countries" is actually discriminating against American religious organizations seeking to provide support and aid to the vulnerable around the world. It is wrong for the Biden administration to impose its values over the values of these faith-based organizations.

In reality, those who will be most affected by these changes will not be the faith-based organizations themselves but rather those who rely on the services of those organizations. *Compassion International* is a Christian humanitarian aid organization that exists to serve children who are in poverty around the globe.² They work with churches in 29 different countries and provide assistance to over 2.3 million children and youth. Any government interested in caring for children faced with poverty would clearly support such a partnership. If this organization is unable to carry on in this work, the vulnerable will suffer the most as a result.

Severing International Relations

If this NPRM were to go into effect, the United States would risk damaging our relationship with allied nations. When the American government forces other countries to adopt its beliefs and policies, we risk cutting off alliances. No one wants to be told what to do by an authority that has no grounds to do so, and this NPRM would do exactly that. It would tell countries who they can and cannot help. Our foreign policies must bring countries together, not apart. To expect foreign governments to adopt the Biden administration's nondiscrimination standard is unfair and creates a divide.

America's influence throughout the world must be maintained as Russia, China, and Iran work to expand their influence. Russia's leader, Vladimir Putin, erodes freedom and democracy around the globe. Standing with Western allies will allow the United States to present a strong front against Russia in the defense of freedom. In China, the Chinese Communist Party poses an immense threat to American prosperity and security. Our partnerships in the region allow us to maintain a strategic presence against China. While America is forcing recipients of foreign aid to align with social liberal values, China is funding countries regardless of their social policies, concentrating more and more power in the hands of the Chinese government. China seeks to expand its global reach and replace America as the world's foremost superpower, and imposing these standards hurts America as we seek to counter China's influence. With Iranian aggression on the rise, it is crucial for countries to be united in limiting the Iranian regime's power and opposing Iran's backing of terrorism around the world. Overall, the NPRM does not focus on uniting America with countries where it provides humanitarian aid. The Biden administration has made no effort to improve

² <https://www.compassion.com/>

America's presence on the world stage as the administration has failed by haphazardly abandoning Afghanistan to the Taliban, refusing to stand up to the Houthis, backing down against China, and being so weak that Putin jumped at the opportunity to invade Ukraine without any fear of American action standing in its way. America cannot stand further deterioration in international relations as foreign aid partnerships are placed in jeopardy.

In conclusion, we believe the NPRM does little to advance nondiscrimination. In fact, we see the NPRM discriminating against faith-based organizations, forcing the ideas of America's progressive left on other countries with traditional cultural norms and beliefs, and rupturing strategic partnerships with other countries.