



December 19, 2019

Division of Grants, Office of Grants Policy, Oversight, and Evaluation
Office of the Assistant Secretary for Financial Resources
U.S. Department of Health and Human Services

RE: RIN 0991-AC16, Department of Health and Human Services, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards.

To Whom it May Concern:

On behalf of Meals on Wheels America, thank you for the opportunity to submit this comment regarding the Department of Health and Human Services' (HHS) proposed rule to revise certain regulatory provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards. I write to oppose this rule and urge its withdraw, as well as withdraw of the accompanying notice of nonenforcement.

As background, Meals on Wheels America is the national nonprofit organization that supports the network of more than 5,000 community-based congregate and home-delivered nutrition programs dedicated to addressing senior hunger and isolation. These local programs operate in virtually every community across the country and are trusted in the homes of millions of our nation's most vulnerable older adults. With the support of dedicated volunteers and staff members, local Meals on Wheels programs provide nutritious meals, safety checks, companionship and connections to other social and health services, enabling millions of America's seniors to live more nourished and independent lives longer in their own communities and out of costly hospitals and long-term care facilities.

Many of the senior nutrition providers that we represent receive HHS grants and funds from other federal sources, including through the Older Americans Act (OAA), to deliver critical nutrition services to those in the greatest social and economic need. These include highly frail seniors, who are often homebound and living alone.

The current regulatory protections this rule seeks to remove are vital because they provide clear guidance to ensure that HHS award grantees do not use federal dollars to discriminate based on gender identity, sexual orientation, sex and religion. The proposed rule would permit grantees that receive funding through taxpayer dollars to discriminate without concern for federal oversight. The range of impacted health-related programs that receive these federal grants, including OAA programs and services, is wide and provides critical, and in some cases lifesaving, services to millions of individuals. Older adults that would no longer be protected under this rule, such as LGBTQ or religious minorities, could therefore be denied such taxpayer-funded services or be otherwise discriminated against. These at-risk groups of seniors already experience barriers to accessing and affording quality healthcare and social supports and will thereby be subject to even greater health disparities than their non-minority counterparts.

This proposed policy is antithetical to the mission of HHS, and the activities and programs to which it grants valuable taxpayer-funded resources: to promote the health and well-being of **all** Americans by providing effective health and human services. On the contrary, this rulemaking

allows federal grant recipients of this agency to discriminate and refuse services to individuals in need.

Senior hunger and isolation know no bounds. As such, we strongly oppose this rule and request that it be withdrawn immediately.

Sincerely,

A handwritten signature in blue ink that reads "Ellie Hollander". The signature is written in a cursive, flowing style.

Ellie Hollander
President and CEO