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December 19, 2025

Health Resources and Services Administration
HIV/AIDS Bureau
5600 Fishers Lane
Rockville, MD 20857

RE: HRSA Ryan White HIV/AIDS Program HIV Quality Measures Module

AIDS United appreciates the opportunity to submit comments on the Ryan White HIV/AIDS Program (RWHAP) HIV Quality Measures Module Federal Register Notice. AIDS United is committed to ending the HIV epidemic through strategic grantmaking, advancing proactive policy and advocacy efforts, and providing capacity building and technical assistance to organizations serving people with HIV across the country. We fully support our RWHAP grantees and partners' impactful work in ensuring that people with HIV remain in care and attain viral suppression.

The RWHAP was established by Congress to address disparities in access to care and health outcomes among populations disproportionately impacted by HIV, and to ensure that program design, evaluation, and quality improvement efforts are responsive to those disparities. Data collection approaches that obscure or eliminate the ability to identify and monitor such populations are inconsistent with the statutory purpose of the Ryan White CARE Act.

The proposed RWHAP HIV Quality Measures Module modification would change 'Gender' to 'Sex at Birth' and would provide the following choices: "Male," "Female," and "Unknown." By limiting the ability to disaggregate outcomes by gender identity, this modification would undermine key RWHAP performance metrics and impair HRSA's ability to monitor disparities, evaluate program effectiveness, and ensure accountability for equitable service delivery across RWHAP-funded programs.

The proposed modification undermines key RWHAP metrics for program efficacy and weakens data quality, threatening data integrity across public health agencies. This effort marginalizes transgender individuals in our efforts to end the HIV epidemic. Consequently, AIDS United strongly opposes this proposed modification as it would hinder our efforts to end the HIV epidemic and obfuscate the impacts of HIV on a disproportionately impacted population. We will not leave any community behind in our mission to end the HIV epidemic.

AIDS United supports the current module that allows for a more accurate and expansive concept of gender. Sex at birth does not automatically correspond with clinical best practices in treating people for their current HIV vulnerability. Our efforts to end the HIV epidemic depend on providing the best informed and tailored care for the many unique communities that are affected. This proposed modification threatens data quality as it would erase specific metrics for transgender and nonbinary persons. This change would also place RWHAP data collection out of alignment with broader HHS and CDC HIV surveillance and clinical frameworks, complicating cross-agency coordination and undermining efforts to track progress under the Ending the HIV Epidemic initiative.

The proposed modification would also impose additional administrative and reporting burdens on RWHAP grantees, many of whom are required to collect gender identity data to comply with other federal, state, and

local reporting standards. Introducing conflicting definitions would necessitate duplicative data collection, EHR system workarounds and increased staff time, without yielding commensurate programmatic benefit.

AIDS United strongly discourages HRSA from implementing this proposed modification as it will undermine trust in RWHAP from the populations it is designed to serve and will deprive us of critical data about programmatic reach and efficacy. Amid current proposals that threaten the HIV safety net and the public health infrastructure that undergirds it, this modification will only further destabilize trust among people living with HIV, erecting new barriers to care at a time when increased access has never been more essential. The removal of gender identity data from RWHAP quality measures also raises serious concerns regarding consistency with federal nondiscrimination principles and may expose HRSA to legal, compliance and reputational risk by effectively erasing transgender and gender nonconforming people from program evaluation.

For thirty-five years, RWHAP has been a successful model in providing HIV care precisely because of the meaningful involvement people with HIV have in crafting, implementing, and shaping RWHAP programming and resources. Transgender individuals have shaped RWHAP and received care through this critical program. This modification threatens longstanding community trust and support for this program, as it would be an erasure of transgender and gender non-conforming communities. Such data erasure is likely to undermine care retention and increase the risk of new HIV transmissions among transgender people, consistent with existing evidence on the relationship between culturally responsive care, trust in providers and sustained engagement in HIV treatment.

AIDS United appreciates the opportunity to share comments on this proposed modification to RWHAP's HIV Quality Measures Module. We welcome collaboration in promoting equitable and sound improvements to the existing RWHAP that will increase care retention and viral suppression. Feel free to contact Leslie McGorman, Senior Director of Policy and Strategy (lmcgorman@aidsunited.org) if you have any questions on the potential implications of this proposed modification.

Sincerely,

A handwritten signature in black ink that reads "Carl Baloney, Jr." The signature is written in a cursive, flowing style.

Carl Baloney, Jr.
President and Chief Executive Officer
AIDS United