



Freedom Network USA

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Office of General Counsel
Regulations Division
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

Via [regulations.gov](https://www.regulations.gov)

RE: Comment in Response to FR-6524-P-01, RIN 2501-AE16 Housing and Community Development Act of 1980: Verification of Eligible Status

HUD Office of General Counsel:

I am writing on behalf of Freedom Network USA (FNUSA) to express strong opposition to the Department of Housing and Urban Development's (HUD) proposed rule: Housing and Community Development Act of 1980: Verification of Eligible Status (FR-6524-P-01). Since 2001, FNUSA has seen the critical role that safe housing access plays in survivors' ability to rebuild their lives and find economic stability. Without long term housing resources, survivors are made vulnerable to re-exploitation. We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations that protect survivors remain in effect.

FNUSA is the nation's largest coalition of non-governmental organizations and individuals directly serving human trafficking survivors. Since the enactment of the Trafficking Victims Protection Act of 2000 (TVPA), FNUSA members have worked closely with survivors of human trafficking to ensure that they receive the full array of legal and social services needed, and that they are engaged in ensuring effective implementation of the law. Our members serve over 4,000 survivors in the US each year. FNUSA is uniquely situated to evaluate the impact of US government efforts to address trafficking and address survivors' service access challenges.

Although HUD states the proposed rule will bring regulations "in greater alignment" with the law and Administration's priorities,¹ the proposed rule is an attack on immigrant families and immigrant survivors. Federal law permits mixed-status families to live together in HUD-subsidized housing.² FNUSA is concerned human trafficking survivors will lose access to the housing resources that keep them safe from re-exploitation, and the rule will throw families into vulnerability to trafficking. The proposed rule

¹ Department of Housing and Urban Development, "Housing and Community Development Act of 1980: Verification of Eligible Status," Docket ID HUD-2026-0199/FR-6524-P-01, 91 FR 8141 (February 20, 2026).

² 42 U.S.C. §1436a(a).

would have a disproportionate impact on trafficking survivors, who rely on HUD subsidies to rebuild their lives and seek financial security. Upending survivors from lifesaving resources violates basic trauma-informed principles and erodes survivors' autonomy in their healing journeys. Safe, affordable housing provides a sense of dignity to survivors and families across the country, allowing them the time they need to build financial stability that keeps communities safe from trafficking.

Disproportionate Harm on Human Trafficking Survivors

Human trafficking is at its core a form of financial exploitation. Survivors are left in poverty with few to no resources. Safe housing is recognized as an essential first step that allows survivors to better access all forms of victim services, better jobs, and self-sufficiency. HUD itself has reported that trafficking-specific and general housing assistance can be critical to survivors' stability.³ When survivors are pushed out of housing resources, they are forced to make difficult decisions between homelessness or going back to traffickers. Any restriction on housing access will push survivors back into trafficking and make more people vulnerable to exploitation.

Many foreign national trafficking victims enter the United States through legal means, and are then exploited through debt bondage, threats of deportation and other forms of coercion. Traffickers also lure undocumented workers already in the US with false promises of obtaining legal status for them. Often immigrant victims lack identification documents or access to their visa documentation because traffickers confiscate their legal documents. Traffickers keep immigrant survivors in a state of isolation and poverty, and condition them to fear retaliation if they try to flee or seek help.

Immigrant survivors may live in mixed status housing for many reasons. Some minor survivors are US citizens or have a T visa, but their family members are not eligible for HUD-subsidized housing. As the processing times for T visas increase each year, survivors are waiting longer for access to the safety and security the status provides.⁴ Denying survivors access to stable housing for over two years contradicts the TVPA's mandate to support trafficking survivors so they are able to assist law enforcement while applying for a T visa. Immigrant survivors waiting for their T visa decisions may reside with US citizen family members or loved ones.

Family reunification is crucial for healing and stability for trafficking survivors. Maintaining a sense of community and safety keeps survivors away from traffickers. If this proposed rule is made effective, families will have to make difficult decisions, to either force their loved one into housing insecurity, or risk homelessness for the entire household.

Housing Access is Critical to Long Term Stability for Human Trafficking Survivors

HUD-subsidized housing resources provide human trafficking survivors with housing stability, that in turn, gives them time and safety to seek victim services. Without a stable address, notifications of

³ US Department of Housing and Urban Development. "Fact Sheet: Housing Needs of Survivors of Human Trafficking Study Overview" available at <https://www.hud.gov/sites/dfiles/Main/documents/VAWA-Fact-Sheet.pdf>

⁴ I-914 processing time as of April 13, 2026 is 29 months for 80 percent of cases. See USCIS Case Processing Times <https://egov.uscis.gov/processing-times/>

critical appointments and court hearings may never reach them, and they may struggle to access evidence needed for legal matters involving immigration, child custody, or protection orders. If a survivor is unhoused and cannot effectively participate in their immigration case, the consequence could be permanent loss of child custody and return to their home country to face dangerous circumstances. Survivors who do not have to worry about where they are sleeping each night are better able to show up for counseling, medical appointments, and job interviews. It is very difficult to find stable employment without a stable address.

Social and victim services available to survivors are already severely limited. Housing instability makes it more difficult for survivors to access other social services to which they are entitled. Benefits like food assistance do not last as long when survivors are scraping funds together to pay full housing costs. Healthcare is harder to access without a stable address. Survivors may lose access to the continuum of care that is necessary for stability and lose trust in the service providers working to help them. Economic empowerment resources, criminal record relief, credit repair options, education, job skills resources, and therapeutic activities are all more difficult to access when someone is unhoused. Housing subsidy restrictions prevent survivors from accessing the very services that help them become self-sufficient so they can eventually afford market-rate housing.

When survivors lose access to stable housing, they may lose access to their support system. They may have to move away from the area their family or community lives in, and lose access to the stability that support system provides. They may have to leave behind pets they can no longer provide a safe home to and belongings they care about. Without these systems, survivors can struggle to build financial security and self-sufficiency. Recovery is not linear, survivors rely on the few stable resources available to give them the time to heal. When these resources are stripped away, survivors are forced backward further into financial insecurity.

Cutting Housing Access Undermines Trafficking Prevention Efforts

The proposed rule will undermine all other human trafficking prevention efforts by cutting survivors off from safe housing resources and forcing families into further financial insecurity. When individuals face housing insecurity, their choices become more limited. They are forced to choose self-preservation above all else. For survivors, their choices may be limited to homelessness or returning to a trafficker. Housing insecurity is one of the main vulnerabilities traffickers exploit. This proposed rule would greatly limit the safe choices available to immigrant survivors and their communities.

Without longer term housing resources, service providers will quickly run out of assistance they can provide to survivors. As social resources are cut across the country, it becomes more difficult for service providers to convince survivors to come forward. It is often a risk for survivors to escape trafficking, and without the knowledge they will get the help they need, they are more likely to stay in a trafficking situation. This proposed rule will discourage immigrant survivors from coming forward and encourage traffickers to use the lack of resources as a tool to keep them in exploitation.

Verification Requirements will Stop Survivors from Seeking Help

The verification requirements in the proposed rule would cause documentation barriers and administrative burdens that could interrupt or delay housing assistance for all household members. HUD has admitted that the Systematic Alien Verification for Entitlement (SAVE) system has limitations on the types of documents it can review, including currently lacking capacity to process birth certificates or U.S. passports.⁵ When the SAVE system has been utilized in other contexts, such as voting, it has made mistakes, particularly in assessing the status of people born outside the United States (even if they are U.S. citizens).⁶ Survivors fleeing trafficking may lack the required documents or necessary support to complete the verification process. Even if they possess documentation of their status, there are significant doubts about SAVE's ability to timely and accurately verify immigration status. The threat of unreliable document verification may prevent survivors from seeking housing assistance, leaving them housing insecure or unhoused, and vulnerable to re-exploitation.

Denying immigrant survivors residing in mixed-status households access to HUD-subsidized housing programs will create and exacerbate vulnerabilities to human trafficking across the country. Any restrictions on access to lifesaving services enables human trafficking. FNUSA urges HUD to immediately withdraw the proposed rule. Instead, HUD should dedicate its efforts to advancing policies that strengthen - rather than undermine - the ability of survivors to support themselves and their families in the future. If we want our communities to thrive, everyone in those communities must be able to get the care, services, and support they need to remain healthy and productive.

Please do not hesitate to contact me at emma@freedomnetworkusa.org if you have any questions or need any further information or explanation.

Sincerely,



Emma Ecker
Associate Policy Manager
Freedom Network USA

⁵ Proposed rule at 8159.

⁶ Jen Fifield and Zach Despart. "SAVE tool keeps mistakenly flagging voters as noncitizens" *ProPublica* and *The Texas Tribune*, Feb 2026, <https://www.texastribune.org/2026/02/13/save-voter-citizenship-tool-mistakes-confusion/>