



Freedom Network USA

April 30, 2026

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-6520-P-01, RIN 2501-AE15, Establishing Flexibility for Implementation of Work Requirements and Term Limits

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: Establishing Flexibility for Implementation of Work Requirements and Term Limits (FR-6520-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 We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations that protect survivors remain in effect.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 would "provide maximum local flexibility" and "promote self-sufficiency for residents,"¹ the proposed rule will greatly reduce human trafficking survivors' access to housing resources and increase vulnerabilities to human trafficking. FNUSA is concerned human trafficking survivors will become unhoused and more vulnerable to re-exploitation. The proposed rule 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

¹ Department of Housing and Urban Development, "Establishing Flexibility for Implementation of Work Requirements and Term Limits," Docket No. FR-6520-P-01, 91 FR 10016, March 2, 2026.

trauma-informed principles and erodes survivors' autonomy in their healing journey. 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.² 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.

Trafficking is recognized as a frequent disabling event. Survivors may face long term health impacts from abuse faced during their trafficking experience. People with disabilities are also targeted by traffickers who take advantage of social stigma and discrimination. Survivors with disabilities face increased hurdles to accessing victim services and public benefits.³ Many are unable to work full time or at all due to their disabilities.

Long term housing resources for human trafficking survivors are severely limited, so survivors rely on HUD-subsidized housing to rebuild their lives. Housing subsidies provide a sense of dignity by helping survivors access stable, safe housing that gives them time to heal. If the time limits proposed in this rule are put in place, survivors may be forced to move frequently after waiting many years on waitlists for HUD-funded housing. Two years is not sufficient time for a survivor to crawl out of poverty and trauma. Moving every two years is cost-prohibitive and will create undue stress for survivors utilizing HUD-subsidized housing resources. Consistency is necessary for survivors to achieve economic stability, and frequent moves upset consistency.

Work requirements may force disabled survivors out of HUD-subsidized housing. They will have to hope that PHAs and Owners do not discriminate against them as many do not have the funds to pursue a fair housing claim. Unnecessary administrative barriers and red tape result in survivors losing access to housing and forces them into homelessness. Work requirements in other public benefits programs have shown few results in increasing employment.⁴ In addition, trafficking survivors often face barriers to accessing employment after leaving a trafficking situation. They may lack education and have limited or inconsistent work histories. Many will face barriers to employment due to the mental health impacts of complex trauma.

² 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>

³ Duke Law and UN Human Rights Council, "Trafficking in Persons and the Rights of Persons with Disabilities," June 2025, https://law.duke.edu/sites/default/files/humanrights/250604-Duke_IHRC_Packet-Final.pdf

⁴ Gray, Colin, Adam Leive, Elena Prager, Kelsey Pukelis, and Mary Zaki, "Employed in a SNAP? The Impact of Work Requirements on Program Participation and Labor Supply," *American Economic Journal: Economic Policy* 15 (1): 306–41, 2023.

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 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. 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 survivors and their communities.

Without longer term housing resources, service providers will quickly run out of assistance opportunities for 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 survivors from coming forward and encourage traffickers to use the lack of resources as a tool to keep them in exploitation.

Denying survivors 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,

A handwritten signature in black ink that reads "Emma Ecker". The signature is fluid and cursive, with the first name "Emma" being larger and more prominent than the last name "Ecker".

Emma Ecker
Associate Policy Manager
Freedom Network USA