

April 21, 2026

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

**Re: Comments in Response to FR-6524-P-01, RIN 2501-AE16 Housing and Community Development Act of 1980: Verification of Eligible Status, submitted via [www.regulations.gov](http://www.regulations.gov)**

The undersigned 51 organizations assist, uplift, and advocate on behalf of survivors of domestic violence, sexual assault, child abuse, human trafficking, and other forms of violence and exploitation. We write to express our strong opposition to Housing and Urban Development's (HUD) proposed rule "Housing and Community Development Act of 1980: Verification of Eligible Status (FR-6524-P-01) (hereinafter "proposed rule").<sup>1</sup> Given the focus of our work, **we urge HUD to withdraw the proposed rule in its entirety** because of the undue burdens it will place on survivors, the service providers who assist them, and our communities as a whole.

#### **A. Introduction**

The proposed rule addresses Section 214 covered housing programs, including public housing, housing choice vouchers, and Section 8 project-based rental assistance programs.<sup>2</sup> For decades, HUD has provided options for "mixed-status" families - those with at least one member who is not eligible for assistance because of their immigration status.<sup>3</sup> These families receive assistance in prorated amounts based on eligible household members.<sup>4</sup>

The proposed rule would eliminate the ability of mixed status families to remain in these housing programs by requiring that all applicants and recipients of assistance under a

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<sup>1</sup> 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) available at <https://www.regulations.gov/document/HUD-2026-0199-0001> (hereinafter "Proposed rule.")

<sup>2</sup> 42 U.S.C. 1436a; Kolker, A, McCarty M. "Noncitizen Eligibility for Federal Housing Programs" Congressional Research Service (January 23, 2023) available at <https://www.congress.gov/crs-product/R46462>

<sup>3</sup> Gartland, E and Acosta, S. "Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers" Center for Budget and Policy Priorities, (December 12, 2025), available at <https://www.cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create>

<sup>4</sup> U.S. citizenship, legal permanent residence, and various other forms of immigration status confer eligibility for prorated federal housing subsidies per 42 U.S.C. 1436a(a). *See also* Kolker, A, McCarty M. "Noncitizen Eligibility for Federal Housing Programs" Congressional Research Service (January 23, 2023) available at <https://www.congress.gov/crs-product/R46462>

covered program demonstrate citizenship or eligible immigration status.<sup>5</sup>

HUD claims that the purpose of the proposed rule is to bring the regulations “in greater alignment with the law and with the current Administration’s priorities, executive orders, and regulatory reform efforts”.<sup>6</sup> However, federal law *already* allows mixed-status families to live together in HUD-subsidized housing.<sup>7</sup> The proposed rule undermines the Congressional intent to permit mixed-status families to reside in federally subsidized housing to keep families together regardless of immigration status.

Any alleged benefit to this proposed rule is far outweighed by the very real harms it will cause. Should the proposed rule go into effect, nearly 80,000 people would lose their housing assistance, impacting nearly 37,000 children.<sup>8</sup> HUD—very explicitly—is counting on fear to implement its harmful policies, stating “we expect that a fear of the family being separated would prompt the departure of most mixed families.”<sup>9</sup> Not only does this contradict longstanding policy, but it is also inhumane. HUD recognizes that access to housing assistance is critical to survivors’ stability,<sup>10</sup> and yet the proposed rule would reduce access to that assistance. The proposed rule is part of a broader pattern of administrative policies that place barriers on immigrant families, contribute to the significant climate of fear in our communities, and cause real harm to survivors of domestic violence, sexual assault, human trafficking, and other crimes.

## II. The Proposed Rule Harms Immigrant Survivors of Gender-Based Violence

Immigrant survivors of gender-based violence such as human trafficking, sexual assault, and domestic violence will be severely and disproportionately harmed by the proposed rule. Access to a safe place to stay is often a survivor’s most immediate need.<sup>11</sup> In fact, the National Human Trafficking Hotline reports that shelter is the most requested service for all crisis cases.<sup>12</sup>

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<sup>5</sup> Proposed Rule at 8153.

<sup>6</sup> Proposed Rule at 8153.

<sup>7</sup> 42 U.S.C. §1436a(a).

<sup>8</sup> Regulatory Impact Analysis: Housing and Community Development Act of 1980, at 12-13 (Sept. 30, 2025), available at <https://www.regulations.gov/document/HUD-2026-0199-0006>; Center for Budget and Policy Priorities “[Administration Plan Targeting Immigrants Would Take Away Rental Assistance. Create New Barriers](#)”

<sup>9</sup> Regulatory Impact Analysis: Housing and Community Development Act of 1980, at 43 (Sept. 30, 2025), available at <https://www.regulations.gov/document/HUD-2026-0199-0006>;

<sup>10</sup> U.S. 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>

<sup>11</sup> National Network to End Domestic Violence. “Domestic Violence Counts: 20th Annual Report” at 4 (March 2026), available at

<https://nnedv.org/wp-content/uploads/2026/03/20th-Annual-DV-Counts-Report-Full-Report-FINAL.pdf> (hereinafter “Domestic Violence Count Report”)

<sup>12</sup> Polaris Project. “Housing and Homelessness Systems On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking” (July 2018), available at <https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking-Housing-and-Homelessness-Systems.pdf>

Domestic and sexual violence as well as human trafficking can be both drivers and consequences of housing instability.<sup>13</sup> Experiences of violence are strongly associated with homelessness and barriers to support, while a lack of stable and safe housing also increases the risk of harm.<sup>14</sup> Statistics show that 38% of all domestic violence victims become homeless at some point in their lifetime.<sup>15</sup> In addition, more than 90% of homeless women have experienced severe physical or sexual abuse at some point in their lives.<sup>16</sup> Another survey showed that 64% of trafficking survivors reported being homeless or experiencing unstable housing at the time they were recruited into the trafficking situation.<sup>17</sup>

### **A. The Proposed Rule Would Create Barriers to Safe Housing**

Survivors face many barriers when trying to find safe housing. Abusers commonly prevent survivors from accessing or acquiring financial resources in order to maintain power and control in the relationship, impacting their ability to leave.<sup>18</sup> In fact, financial dependence on an abuser is one of the most common reasons survivors stay with abusive partners.<sup>19</sup>

Securing non-subsidized housing is extremely difficult for survivors, who often experience financial abuse and isolation, which can negatively impact their credit scores, employment or rental histories, income, and financial assets.<sup>20</sup> In one study, 99% of domestic violence victims reported experiencing economic abuse.<sup>21</sup> In another, two-thirds of

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<sup>13</sup> National Network to End Domestic Violence "Housing Policy" available at <https://nnedv.org/content/housing-policy/>

<sup>14</sup> Downtown Women's Center "Los Angeles City Women's Needs Assessment" (2019), available at <https://www.downtownwomenscenter.org/wp-content/uploads/2020/01/DWC-2019-Los-Angeles-Womens-Needs-Assessment.pdf>; See also National Sexual Violence Resource Center. "What are the links between sexual violence and housing" (2020), available at [https://www.nsvrc.org/wp-content/uploads/2020/12/Whatarethelinks\\_Final508.pdf](https://www.nsvrc.org/wp-content/uploads/2020/12/Whatarethelinks_Final508.pdf)

<sup>15</sup> American Bar Association. "Five Facts About Domestic & Sexual Violence and Homelessness" available at [https://www.americanbar.org/groups/domestic\\_violence/initiatives/five-for-five/five-facts-homelessness/](https://www.americanbar.org/groups/domestic_violence/initiatives/five-for-five/five-facts-homelessness/)

<sup>16</sup> *Id.*

<sup>17</sup> Polaris Project. "Housing and Homelessness Systems On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking" (July 2018), available at <https://polarisproject.org/human-trafficking-and-housing-homelessness/>

<sup>18</sup> National Network to End Domestic Violence. "Financial Abuse Fact Sheet" available at: <https://nnedv.org/wp-content/documents/Financial%20Abuse%20Fact%20Sheet%20-%20May%202025%20EN.pdf>

<sup>19</sup> Cynthia Hess and Alona Del Rosario, M.A. Dreams Deferred: A Survey on the Impact of Intimate Partner Violence on Survivors' Education, Careers, and Economic Security (2018) available at [https://iwpr.org/wp-content/uploads/2020/09/C475\\_IWPR-Report-Dreams-Deferred.pdf](https://iwpr.org/wp-content/uploads/2020/09/C475_IWPR-Report-Dreams-Deferred.pdf) The Mary Kay Foundation. "2012 Mary Kay Truth About Abuse Survey Report." Survey. 2012, <http://content2.marykayintouch.com/Public/MKACF/Documents/2012survey.pdf>.

<sup>20</sup> American Bar Association. "Five Facts About Domestic & Sexual Violence and Homelessness" available at [https://www.americanbar.org/groups/domestic\\_violence/initiatives/five-for-five/five-facts-homelessness/](https://www.americanbar.org/groups/domestic_violence/initiatives/five-for-five/five-facts-homelessness/)

<sup>21</sup> Adrienne E. Adams. CFS Research Brief 2011-5,6 "Measuring the Effects of Domestic Violence on Women's Financial Well-Being" Center for Financial Security, University of Wisconsin-Madison, available at <https://cfs.wisc.edu/wp-content/uploads/2015/04/adams2011.pdf>

respondents said their abusive partner's behavior negatively impacted their educational and job training opportunities.<sup>22</sup>

### 1. Systemic Barriers to Safe Housing

In addition, the lack of options for affordable and safe housing has resulted in limited opportunities for survivors to secure stability following victimization.<sup>23</sup> There is often a much greater demand for safe housing options than communities can meet. According to the National Network to End Domestic Violence's 20th Annual Domestic Violence Counts Report, in just one day in 2025, 53,590 adults and children were housed in emergency shelters, transitional housing, hotels/motels, or other housing provided by domestic violence programs.<sup>24</sup> On the same day, however, 7,495 requests for these services were denied due to a lack of resources, funding, and/or staffing.<sup>25</sup> The report notes, "Without a safe place to live, many survivors are unable to leave abusers, hold down a job, enroll their children in school, and build stable lives that allow them to heal. A lack of affordable housing nationwide means that advocates often struggle to help survivors find a place to call home."<sup>26</sup> An advocate in Massachusetts reports,

*"Emergency shelters are now full more often than not, leaving survivors with nowhere to turn. Rent prices are at record highs and far beyond what most survivors can afford as they try to rebuild their lives. Survivors aren't just searching for housing; they're navigating a system full of barriers, where urgent needs are met with long waits, closed doors, and limited support. The path to safety shouldn't be this hard."<sup>27</sup>*

HUD's own analysis of the proposed rule concludes that without an increase in appropriations, fewer, not more, families are likely to receive assistance as a result of the proposed rule.<sup>28</sup> The proposed rule therefore would result in *reduced access* to safe housing, creating a significant safety risk for survivors and their eligible household members. HUD should not compromise survivors' ability to seek safety and stability after abuse by further limiting options for safe housing, which would leave survivors facing homelessness, increased economic hardship, or continued harm by an abuser.

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<sup>22</sup> Cynthia Hess, Ph.D. and Alona Del Rosario M.A. "[Dreams Deferred: A Survey on the Impact of Intimate Partner Violence on Survivors' Education, Careers, and Economic Security](https://iwpr.org/dreams-deferred-a-survey-on-the-impact-of-intimate-partner-violence-on-survivors-education-careers-and-economic-security/)," Institute for Women's Policy Research, available at <https://iwpr.org/dreams-deferred-a-survey-on-the-impact-of-intimate-partner-violence-on-survivors-education-careers-and-economic-security/>

<sup>23</sup> National Alliance to End Sexual Violence. "Exploring the Intersection of Sexual Assault and Housing: Key Listening Session Findings" (August 2024), available at "<https://www.nsvrc.org/wp-content/uploads/2021/01/NAESV-Housing-Final-Summary.pdf>

<sup>24</sup> Domestic Violence Count Report at 2

<sup>25</sup> Domestic Violence Count Report at 12, Programs report that they could not meet these requests due to lack of sufficient resources, funding, and/or staffing to meet these needs.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> Regulatory Impact Analysis: Housing and Community Development Act of 1980, at 5 (Sept. 30, 2025). Available at <https://www.regulations.gov/document/HUD-2026-0199-0006>

## 2. Immigrant survivors face additional and compounding barriers to safe housing.

For immigrant survivors, access to safe housing is exacerbated by challenges such as language access barriers, uncertain immigration status, social isolation, discrimination, and unfamiliarity with local networks, making it even harder to secure safe and stable housing.<sup>29</sup> In addition, abusive partners commonly withhold or destroy passports or other legal documents or threaten survivors with deportation or family separation to keep them isolated, financially dependent, and prevent them from seeking help.<sup>30</sup> These tactics often force immigrant survivors to remain in abusive relationships.<sup>31</sup> Lack of affordable and safe housing poses a significant barrier to safety, as authorization to work, income, and identification are all necessary to secure housing.<sup>32</sup>

Immigrant survivors may hold a wide range of immigration statuses, which impact options for safety net benefits, including federal housing assistance. Immigrant survivors of domestic violence, sexual assault, human trafficking, and other crimes may be eligible for immigration benefits under the Violence Against Women Act, the Trafficking Victims Protection Act, and other laws.<sup>33</sup> The proposed rule will harm survivors who may be in the process of applying for survivor-based immigration protections. Though survivors such as those applying for asylum or trafficking survivors with continued presence or T visas may eventually be eligible for federal housing benefits, they are not eligible until their cases are approved. Currently, there is a 29-month waiting period for T visa applications,<sup>34</sup> more than double what it was just 3 years ago.<sup>35</sup> Similarly, asylum seekers, including those who have suffered gender-based violence, have their lives and safety on hold due to an immense backlog and slow processing of asylum cases.

Survivors with pending or approved petitions for U nonimmigrant status will also be harmed by the proposed rule as they are not independently eligible for 214 program unless

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<sup>29</sup> See Flores, Y.R., Raut, S., Mengo, C. *et al.* Service Accessibility: Service Providers' Perspectives on Barriers Faced by Immigrant Women of Color Survivors of Intimate Partner Violence. *J Fam Viol* (2025). available at <https://doi.org/10.1007/s10896-025-00909-x>. See also Ayeni O.O., & Flores Y. "Domestic Violence and Housing Insecurity: A Crisis for Black Immigrant and Refugee Survivors" National Resource Center on Domestic Violence (2025). available at <https://safehousingpartnerships.org/wp-content/uploads/2025/05/DV-and-Housing-Insecurity-A-Crisis-for-Black-Immigrant-and-Refugee-Survivors.pdf>

<sup>30</sup> Futures Without Violence. "Immigration Power and Control Wheel" available at <https://s3.amazonaws.com/fwvcorp/wp-content/uploads/20160121105935/Power-control-wheel-eng-4-w-description.pdf>

<sup>31</sup> Flores, Y.R., Raut, S., Mengo, C. *et al.* Service Accessibility: Service Providers' Perspectives on Barriers Faced by Immigrant Women of Color Survivors of Intimate Partner Violence. *J Fam Viol* (2025). available at <https://doi.org/10.1007/s10896-025-00909-x>

<sup>32</sup> *Id.*

<sup>33</sup> See DHS. Blue Campaign and Center for Countering Human Trafficking. "U.S. Immigration Benefits for Noncitizen Crime Victims, available at <https://niwaplibrary.wcl.american.edu/wp-content/uploads/DHS-Interactive-Infographic-on-Protection-for-Immigrant-Victims.pdf>; See also DHS. Immigration Options for Victims of Crime, available at <https://www.dhs.gov/publication/immigration-options-victims-crime>

<sup>34</sup> See USCIS Case Processing Times available at <https://egov.uscis.gov/processing-times/>

<sup>35</sup> USCIS. Historic Processing Times, available at <https://egov.uscis.gov/processing-times/historic-pt>

or until they have secured lawful permanent residence (or some other eligible status). Under the proposed rule, these crime victims - who have demonstrated helpfulness in the investigation or prosecutions of crime-would be effectively excluded from housing assistance if they have eligible family members, contrary to Congress' intent to protect victims of crime and support their safety.

Having access to housing assistance helps survivors leave abusive relationships and keep themselves and their families safe. As one survivor stated after securing housing, "I can't believe I'm safe in my own apartment: a place where I'm not walking on eggshells, where I don't have to worry about being controlled or trapped. That feeling of peace and safety is something I didn't think I'd have again, and it means everything to me."<sup>36</sup>

The proposed rule endangers and destabilizes that sense of safety for survivors and would place survivors in mixed status families in an impossible position - forcing them to separate so that eligible family members continue to receive assistance, return to an abusive family member, or to forgo that assistance, and potentially face homelessness, to remain together.

## **B. The Proposed Rule's Verification Requirements Create Barriers for Survivors**

While the proposed rule primarily targets mixed-status households, it creates onerous requirements that will also impact the housing security of **all tenants** living in the covered housing programs, including current and future U.S. citizens. The proposed rule outlines a two-step verification process to determine eligibility. For the first step, applicants would need to submit a signed declaration and a consent form allowing the Public Housing Authority or owner to run their information through the Systematic Alien Verification for Entitlement (SAVE) program to conduct "primary verification" of citizenship or eligible immigration status.<sup>37</sup> If that does not confirm a person's eligibility for housing, then applicants would have to submit documentary proof of citizenship for a secondary review.<sup>38</sup>

These new verification requirements for every household member would cause documentation barriers and administrative burdens that could interrupt or delay housing assistance. HUD acknowledges that the SAVE system has limitations on the types of documents it can review, including a current lack of capacity to process birth certificates or U.S. passports.<sup>39</sup> One in ten voting-age Americans (about 21.3 million) do not have proof of citizenship- like birth certificates, passports, naturalization certificates, or certificates of citizenship readily available.<sup>40</sup> In addition, studies have shown evidence of age and racial

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<sup>36</sup> National Network to End Domestic Violence. "Domestic Violence Counts: 20th Annual Report" (March 2026), available at <https://nnedv.org/content/domestic-violence-counts-20th-annual-report/>

<sup>37</sup> Proposed rule at 8158.

<sup>38</sup> Proposed rule at 8158-59.

<sup>39</sup> Proposed rule at 8159.

<sup>40</sup> Kevin Morris and Cora Henry. "Millions of Americans Don't Have Documents Proving Their Citizenship Readily Available" Brennan Center for Justice (June 14, 2024), available at <https://www.brennancenter.org/our-work/analysis-opinion/millions-americans-dont-have-documents-proving-their-citizenship-readily>

disparities in these numbers.<sup>41</sup> Low-income individuals are less likely to possess the necessary documents,<sup>42</sup> which means that the number of HUD residents who lack ready access to these documents is likely even higher.

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).<sup>43</sup> HUD's discussion of SAVE in the regulatory impact analysis does not include any analysis about its deployment as a tool to verify citizenship status.<sup>44</sup> Nor does HUD adequately assess the system's impact on HUD residents, applicants, and housing providers.

Survivors fleeing violence may lack the required documents or necessary support to complete the verification process. In addition, for immigrant survivors, the very process of obtaining documentation for each and every household or family member could prove to be a risk. Requiring survivors to acquire additional documentation of children of an abusive ex-partner, for example, may force vulnerable survivors to contact family members who will refuse to help or support survivors, or otherwise jeopardize their safety and confidentiality. Even if survivors possess documentation of their status, there are significant doubts about SAVE's ability to timely and accurately verify immigration status. Survivors should not have to wait and rely on an inaccurate and unreliable system when fleeing violence.

### III. Conclusion

Prohibiting immigrant survivors in mixed-status households from accessing Section 214 housing programs will lead to additional barriers for survivors of violence and their families, as they will be unable to access critical protections that can help them gain stability and thrive. We urge HUD to immediately withdraw its proposed rule, and instead to advance policies that strengthen—rather than undermine—the ability of immigrants, including survivors of violence, to support themselves and their families.

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<sup>41</sup> Jillian Andres Rothschild et al., *Who Lack ID in America Today? An Exploration of Voter ID Access, Barriers, and Knowledge* (June 2024).

<https://cdce.umd.edu/sites/cdce.umd.edu/files/pubs/Voter%20ID%20survey%20Key%20Results%20June%202024.pdf>; showing while just over 8 percent of white American citizens don't have citizenship documents readily available, that number is nearly 11 percent among Americans of color. Similarly, 18 - 24 year-olds struggle most with the issue of easy access to their citizenship documents.

<sup>42</sup> See, e.g., Institute for Responsive Government, *Who has Proof of Citizenship? A Summary of UMD's Texas and Georgia Case Studies* (undated).

<https://responsivegov.org/wp-content/uploads/2025/01/20250107-Who-Has-Proof-of-Citizenship-A-Summary-of-UMDs-Texas-and-Georgia-Case-Studies-2.pdf>; see also *Citizens Without Proof: A Survey of Americans' Possession of Documentary Proof of Citizenship and Photo Identification*, Brennan Center for Justice (Nov. 2006) (noting that at least 12 percent of citizens earning less than \$25,000 a year did not have proof of citizenship). [http://www.brennancenter.org/sites/default/files/legacy/d/download\\_file\\_39242.pdf](http://www.brennancenter.org/sites/default/files/legacy/d/download_file_39242.pdf)

<sup>43</sup> Jen Fifield and Zach Despart, "SAVE tool keeps mistakenly flagging voters as noncitizens" *ProPublica* and *The Texas Tribune*, 13 Feb 2026, available at

<https://www.texastribune.org/2026/02/13/save-voter-citizenship-tool-mistakes-confusion/>

<sup>44</sup> *Regulatory Impact Analysis: Housing and Community Development Act of 1980*, at 5 (Sept. 30, 2025). Available at <https://www.regulations.gov/document/HUD-2026-0199-0006>

Respectfully submitted,

### **National Organizations**

Asian Pacific Institute on Gender Based Violence  
ASISTA Immigration Assistance  
Empowering Pacific Islander Communities (EPIC)  
Esperanza United  
Freedom Network USA  
Haitian Bridge Alliance  
Justice + Joy National Collaborative  
National Housing Law Project  
Progressive Vietnamese American Organization (PIVOT)  
Tahirih Justice Center  
The Advocates for Human Rights  
Ujima, The National Center on Violence Against Women in the Black Community  
ValorUS  
Victim Rights Law Center

### **State and Local Organizations**

#### **Arizona**

William E. Morris Institute for Justice

#### **California**

Coalition to Abolish Slavery and Trafficking  
Immigration Center for Women and Children  
Justice At Last, Inc.  
Mixteco/Indigena Community Organizing Project  
Sunita Jain Anti-Trafficking Organization, Loyola Law School

#### **District of Columbia**

Ayuda  
DC Coalition Against Domestic Violence

#### **Georgia**

Georgia Asylum and Immigration Network  
Serving at Risk Families Everywhere, Inc. (SAFE)

#### **Illinois**

Life Span  
The Network: Advocating Against Domestic Violence

#### **Maryland**

Maryland Coalition Against Sexual Assault

**Massachusetts**

Casa Myrna Vazquez  
REACH Beyond Domestic Violence  
Spanish American Center  
The Second Step

**Michigan**

Michigan's Children

**Minnesota**

International Institute of Minnesota (IIMN)  
Mid MN Legal Aid (MMLA)  
Women's Shelter, Inc.

**New Jersey**

El Pueblo Unido, Atlantic City  
New Jersey Coalition to End Domestic Violence

**New York**

Domestic Violence Project | Urban Justice Center  
Empire Justice Center  
Her Justice  
New York State Coalition Against Domestic Violence  
Sakhi for South Asian Survivors

**Ohio**

Ohio Alliance to End Sexual Violence, OAESV

**Pennsylvania**

Pennsylvania Immigration Coalition

**Texas**

The SAFE Alliance

**Utah**

Utah Domestic Violence Organization

**Vermont**

Vermont Network Against Domestic and Sexual Violence

**Washington**

Beyond Survival  
Washington State Coalition Against Domestic Violence & Sexual Assault

**Wisconsin**

Algoma Housing Authority  
Kewaunee County Housing Coalition