



Freedom Network USA

July 13, 2026

The Honorable Russell T. Vought
Director Office of Management and Budget
725 17th Street NW Washington, DC 20503

Re: OMB-2026-0034, Regulation for Federal Financial Assistance

Dear Director Vought:

Freedom Network USA is the nation's largest coalition of human trafficking victim service providers. We write to oppose the proposed Office of Management and Budget Regulation for Federal Financial Assistance (OMB-2026-0034) because of the direct harms it will cause to the over 19,000 human trafficking survivors served by victim service grants from the Department of Justice (DOJ) and Department of Health and Human Services (HHS).¹

The human trafficking victim service grant programs at the DOJ and HHS were established with overwhelming bipartisan support in the landmark Victims of Trafficking and Violence Prevention Act of 2000, and strengthened through following reauthorizations (collectively, the TVPA). These programs make communities safer by giving victims the resources and support they need to escape trafficking and rebuild their lives. We have made vast improvements in helping survivors thrive and find safety through these programs. Adding additional layers of unnecessary bureaucracy and politicizing grant decisions, rather than choosing the most qualified, survivor-centered organizations, will take away from this lifesaving work.

Trafficking victim service providers across the country are already experiencing the harms of the political review process. The TVPA-authorized human trafficking victim service grants for fiscal year 2025 are delayed by over nine months. Thousands of survivors have either already lost their service provider or are at risk of losing access to services because of this catastrophic delay. The DOJ claimed the funds would be released by July 1, 2026, but has yet to award any grants. The fiscal year 2026 grants are also delayed and unlikely to be released on time by September 30, 2026 because the notices of funding have yet to be posted. These delays have been attributed to the new political review process.

Concerns within the proposed regulation

The proposed changes in the NPRM would grant the executive branch seemingly unlimited discretion over federal grants, fueling decisions based on partisan ideology. The human trafficking victim services programs at both HHS and DOJ have improved over time as leadership has considered the needs of

¹ See 2025 Trafficking in Persons Report, <https://www.state.gov/reports/2025-trafficking-in-persons-report/>

survivors in grantmaking. The programs are best suited to meet survivors' and their communities needs when they are at the forefront of decision making. Allowing the everchanging priorities of any administration to decide what's best for survivors without their input will result in less effective and more wasteful federal spending.

Some of the grants under this program are specifically designed for service providers to build new programs to fill gaps in the service network. Grants are provided in multi-year terms in order to provide these organizations with enough time to scale a project to serve more survivors in their communities. Allowing for expanded discretion over the ability to terminate a grant mid-cycle, will not allow providers sufficient time to build up their programs. Grant cancellations partway through their terms also create instability for survivors. If their provider suddenly loses funding, they will lose their connection to case management, legal assistance, housing, food, counseling, and healthcare overnight. This puts survivors at risk of re-exploitation and abuse.

Service providers are already operating in difficult conditions as the costs for basic needs rise and funds from multiple federal agencies are delayed. The proposal would force grantees to operate in a constantly shifting environment, making it even more difficult to provide lifesaving services to their communities. Providers who are forced to adjust to new grant terms frequently will be unable to focus enough time to service provision. They will have to redirect staff time and energy to compliance to changing grant terms, which will take away time assisting survivors. If sudden changes limit the services they can provide, survivors will lose access to critical services and be put at risk of re-exploitation.

Human trafficking survivors have a wide range of needs and often require specialized service providers to obtain the resources they need. These providers are often in the best position to help survivors because they understand the unique needs of different communities. The proposal threatens programs that help address longstanding racial, social, and other disparities or serve underserved communities. If providers are punished for having specialization, survivors will lose access to trusted providers. Trafficking survivors also are often identified by providers who do outreach to other intersecting communities. A survivor may be identified by a program serving the LGBTQ+ community and then connected with a trafficking-specific provider. The combination of what both of these programs provide might be exactly what the survivor needs to find financial stability and healing.

Community engagement is a critical component of effective grantmaking for populations who experience violence, including trafficking survivors. Survivors know their needs best. The services funded by OVC and HHS have only improved over the past 25 years because survivors were allowed space to shape the programs. Without community engagement requirements, programs will be less effective and disconnected from the trends of what survivors need.

Effective grantmaking also requires the thorough consideration of peer review. Every victim service grant program is specialized to serve specific types of survivors, meaning specific expertise is essential to determining if applicants will provide effective services. While discretion from leadership has always been a part of grantmaking, peer review results should heavily influence the final decisions. Leadership

of federal agencies cannot hold all of the expertise needed to assess grant applications from disparate types of grant programs. The integrity of the grantmaking process should be preserved by maintaining a robust peer review process within all agencies.

FNUSA urges OMB to rescind this proposed rule and protect the integrity of federal grantmaking

The proposed regulation will result in concrete harms to the over 19,000 survivors served by federal grants at DOJ and HHS. The proposal will create undue costs for grantees to keep up with discretionary changes, encourage politicized grantmaking, and prevent service providers from hosting the services survivors need most. Effective service providers will be deterred from participating in these grant programs, harming the survivors the program intends to serve. We encourage OMB to rescind this proposed regulation.

Please reach out to emma@freedomnetworkusa.org with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Emma Ecker". The signature is fluid and cursive, with a long horizontal stroke at the end.

Emma Ecker
Associate Policy Manager
Freedom Network USA