August 31, 2026

Submitted via reginfo.gov
Department of Housing and Urban Development
451 7th Street SW, Room 8220
Washington, DC 20410

Re: 30-Day Notice of Proposed Information Collection: Housing Discrimination Complaint Form HUD 903, Docket No. FR-7107-N-15; OMB Control No.: 2529-0011

To Whom It May Concern:

The undersigned organizations work to support survivors of domestic and dating violence, sexual assault, stalking and harassment, and human trafficking with their housing, safety, and healing needs. We are committed to the successful implementation of the Violence Against Women Act's (VAWA) housing provisions, so that survivors are consistently able to secure and maintain safe and affordable housing. We submit the following comments in response to HUD's proposed changes to Housing Discrimination Complaint Form HUD 903. As explained in more detail below, we cannot support the proposed Form HUD 903, and recommend that HUD undo the harmful changes it has made to the form, including adding back in the language access protections, and that HUD keep and expand the VAWA improvements to the form. For these reasons, OMB should not approve the proposed changes to HUD Form 903.

As Congress noted in its findings when it added housing protections to VAWA over 20 years ago, there is a "strong link between domestic violence and homelessness" and survivors and their families experience housing discrimination and are "denied access to, and even evicted from public and subsidized housing because of their status as victims of domestic violence." [1] Despite progress being made to create and expand safe housing opportunities for survivors of domestic violence, sexual assault, dating violence, and stalking, they still experience housing discrimination across the country.

Starting with the Violence Against Women Reauthorization Act of 2022, HUD was authorized to enforce VAWA's housing rights "consistent with, and in a manner that provides, the same rights and remedies as those provided for in the Fair

[1] VIOLENCE AGAINST WOMEN AND DEPARTMENT OF JUSTICE REAUTHORIZATION ACT OF 2005, PL 109–162, 119 Stat 2960 (Jan. 5, 2006).

Housing Act."[2] As such, HUD has taken steps to update its Housing Discrimination Complaint Form HUD 903 to reflect that HUD now accepts and investigates VAWA complaints. While there are a number of proposed changes to the form that reflect HUD's new authority to enforce VAWA, it is unlikely that many survivors will ultimately be able to use this form to file housing discrimination complaints given the safety risks that using this proposed form would pose for survivors. In addition, HUD proposes numerous changes to HUD Form 903 that would remove language access for survivors who are limited English proficient (LEP), such as no longer providing translated versions of HUD Form 903 or allowing the complainant to indicate their preferred language.

1. **The proposed HUD Form 903 does not reflect VAWA's confidentiality requirements.**

We appreciate the new proposed first page of the form as it provides examples of the various types of complaints that can be submitted using the form, including VAWA complaints. However, this introductory section needs to contain more information about how the information used in filing of the complaint will align with VAWA's confidentiality requirements, which are designed to ensure a survivor's safety when exercising their rights under VAWA. Survivors are often concerned about how their information will be used and that the information could be shared in a way that jeopardizes their safety. They will also be concerned about sharing extremely personal, traumatic information. HUD should therefore provide information upfront for how the form will be used and what steps HUD will take to protect privacy and safety, while also acting in conformity with VAWA's confidentiality mandates. While the form proposes to add the Privacy Act Statement, it does not appear until the last page of the form and does not contain any explicit language with regard to a person's right to confidentiality under VAWA.

2. **The proposed HUD Form 903 is not accessible to LEP survivors.**

HUD's proposed changes to HUD Form 903 would significantly restrict meaningful access to the VAWA complaint process for LEP survivors. Given that more than 25 million people in the United States are limited English proficient, the HUD Form 903 process needs to provide meaningful language access for survivors seeking to report VAWA-related discrimination and abuse. The need for language access among survivors is well documented. In a 2022 report, the Department of Justice found that there were over 35,000 survivors with limited English proficiency

[2] *Notice to Public Regarding FHEO Enforcement Authority and Procedures: Violence Against Women Act of 2022 (VAWA)*, FHEO Notice FHEO-2023-01 (Jan. 20, 2023); 34 U.S.C. §§ 12494 & 12495 (2023).

being served by VAWA funded programs.[3] Survivors with limited English proficiency face particular barriers in understanding their rights, navigating complaint procedures, and securing timely protection.[4] Clarity, accessibility, and translation are essential components of an effective complaint system and VAWA itself recognizes language access as an essential component of enforcing survivors' housing rights.[5]

HUD has added language in bold and all caps at the top of the second page stating that: "HUD WILL SOLELY BE USING ENGLISH AS THE OFFICIAL LANGUAGE FOR ALL BUSINESS AND SERVICES." Consistent with this proclamation, HUD has removed the option for a complainant to indicate their preferred language in the contact information section, and it no longer makes the form available in multiple languages. The Notice of Proposed Information Collection provides no explanation or justification as to why HUD has made these changes or why HUD believes they are consistent with its obligations to provide meaningful language access. These actions run counter to VAWA, which mandates language access for several notices that are critical for enforcing one's rights under VAWA.[6] The ability to file a VAWA complaint is equally critical to enforcing one's rights under VAWA. Thus, HUD should also continue to provide the complaint in multiple languages.

For survivors of domestic violence, sexual assault, dating violence, and stalking, the ability to communicate your experiences in the langauge most comfortable to you is vital. To file a housing discrimination complaint alleging violations of VAWA, survivors are already being asked to tell their stories multiple times, which can be highly traumatic, and to relive the trauma that they've experienced. Prohibiting survivors from telling their stories in the language that they are best able to communicate is not only disempowering but also unnecessarily increases the difficulty for them to file a complaint on their own or even at all. Not being able to file a complaint independently means that the survivor would have to share information with someone proficient in English and the survivor's primary language to file a complaint. This creates additional confidentiality concerns as the survivor may be forced to share their story with someone they may not have wanted

[3] 2021 - 2022 REPORT TO CONGRESS On the Grants to Reduce Domestic Violence, Dating Violence, Sexual Assault, and Stalking on Campus Program (2022), https://www.justice.gov/ovw/media/1379971/dl?inline=&utm.
[4] Ayeni O.O., *Language Access and Interpretation in Domestic Violence Contexts: Perspectives from Survivors and Interpreters*, National Resource Center on Domestic Violence (NRCDV) (2025), https://www.dvevidenceproject.org/wp-content/uploads/2025/08/Language-Access-and-Interpretation-in-Domestic-Violence-Contexts.pdf.
[5] 34 U.S.C.A. § 12491(d)(2)(D) (2026).
[6] *Id.*

to involve. The creation of this barrier, may even mean a survivor chooses not to ask for help filling out the form at all, and doesn't move forward with a complaint.

Finally, the revised HUD Form 903 would require the survivor to sign the complaint, which contains the following warning: "By signing this document, you declare under penalty of perjury that you have read your complaint and that it is true and correct to the best of your knowledge." An LEP survivor who cannot read or understand the English-language complaint, will be put into an untenable position of signing a document that they cannot review or verify. The survivor who obtained assistance with completing the form could be subject to prosecution if any of the statements contained in the complaint were false, even though the survivor could not read or understand what was actually written in the complaint

3. **The Notice of Information Collection does not reflect updates to the online version of HUD Form 903.**

It is unclear from the information collection notice whether HUD intends to update the online version of the complaint form. HUD should update the online version of HUD Form 903 to ensure it is fully user-friendly, trauma-informed, and inclusive of survivors protected under VAWA and mirrors the paper form. The online form should use clear, accessible language, allow complainants to identify VAWA-related harms without confusion, and be designed for ease of use across devices and for people with LEP or disabilities.

4. **The proposed HUD Form 903 does not reflect trauma-informed practices and additional protections provided by VAWA 2022.**

To increase trauma-informed best practices and mitigate potential safety and housing instability risks for a survivor, the form needs to clearly explain what happens after submission, including expected timelines for acknowledgment, review, investigation, referral, and resolution, as well as the survivor's rights, available supports, and any next steps required. Providing this information upfront would make the process more transparent, reduce uncertainty for survivors, and improve meaningful access to the complaint system. Because survivors may be required to act within VAWA-related complaint timelines and other applicable deadlines, the HUD Form 903 should clearly explain those timelines and procedural requirements in plain language so users understand how to preserve their claims. Just as survivors are expected to meet filing deadlines, HUD should likewise commit to a reasonable and transparent response timeline so complainants know when to expect follow-up and are not left without information at a critical moment.

The form's statement that HUD will "review your information and get back to you as soon as possible" is too vague to provide meaningful guidance to survivors facing urgent threats, including ongoing harassment, housing instability, or homelessness. For survivors in crisis, time is of the essence, and the absence of clear timelines or information about next steps creates unnecessary uncertainty at a moment of serious vulnerability. This language needs to be revised to provide greater transparency about when a complainant can expect acknowledgment, follow-up, and information about the status of their complaint.

In many circumstances, the violation of a survivor's housing rights not only puts them at risk of homelessness, but also at risk of further physical danger and emotional trauma. While it is an improvement to add the ability for a complainant to include an alternative contact, the proposed HUD Form 903 does not allow a survivor to indicate whether it is safe to contact them or whether their safety requires HUD to contact the alternative contact or to utilize some other survivor-approved communication method.

The proposed form fails to recognize that there is an increase in technological abuse. We would suggest modifying the explanatory language to the question, "Where did the alleged discrimination happen?" to ensure that the form is comprehensive and clear. Discrimination can happen anywhere, including online, electronically, or by other technological methods of discrimination (i.e. email, text, phone, etc.). These are often the primary methods of communication that people use to communicate with each other when they are not speaking in person. Thus, the form should advise a survivor that they can answer in that way. It should also permit them to provide multiple locations for where the discrimination occurred (both physically and virtually).

As noted above, we support the addition of the introductory section of the form that explains examples of VAWA violations as it increases the usability of the complaint for lay audiences. However, this should include additional examples of common types of discrimination that survivors experience that are uniquely covered under VAWA, such as confidentiality and documentation violations, the denial of emergency transfers due to owing rent, vouchers terminated for moving before securing permission, and economic abuse and technological abuse.

The proposed HUD Form 903 contains language that failure to fill in the form may result in the complaint not being processed. Such language ignores the experience of victims of trauma and their availability. We would suggest deleting this language altogether and including language advising that a complainant can leave any question or fields on the form blank if they do not have the information or do not understand.

Afterall, once the form is submitted, a HUD investigator will need to contact the complainant or their designee as part of their investigation. Providing this language is not only supported by trauma-informed practices, but also alleviates the additional burden imposed by requiring a survivor complainant to sign the form under penalty of perjury or prosecution.

Finally, VAWA 2022 required HUD to conduct a study assessing the availability and accessibility of housing and services for individuals experiencing homelessness or housing instability who are survivors of trafficking, or at risk of being trafficked.[7] HUD released the study, "Housing Needs of Survivors of Human Trafficking Study" in 2024. One of the principal findings of the study was that "Survivors face discrimination in numerous ways, including based on being members of a protected class. Discrimination and exploitative behavior by housing providers create barriers to accessing and maintaining safe housing, even when housing assistance is available."[8] While human trafficking is not a protected group under VAWA, many survivors of human trafficking fall into the protected VAWA categories. Thus, it is critical that survivors of trafficking and their advocates know that they can use this form to assert housing discrimination, not only under VAWA, but pursuant to other federal civil rights laws that HUD is authorized to enforce.

Thank you for the opportunity to review the discrimination form and provide feedback. If you have questions about this comment, please contact Natalie Maxwell, nmaxwell@nhlp.org.

Sincerely,

National Housing Law Project

National Network to End Domestic Violence

National Resource Center on Domestic Violence

National Low Income Housing Coalition

Pennsylvania Coalition Against Domestic Violence

Alabama Coalition Against Domestic Violence

California Center for Movement Legal Services

[7] CONSOLIDATED APPROPRIATIONS ACT 2022, PL 117-103, March 15, 2022, 136 Stat 49 (2022).
[8] HUD Press Release No. 24-059, HUD Releases First-of-its-Kind Report to Congress on the Housing Needs of Survivors of Human Trafficking (March 21, 2024).

California Partnership to End Domestic Violence

Coalition Ending Gender-Based Violence

CT Coalition Against Domestic Violence

DC Coalition Against Domestic Violence

Disability Rights Education and Defense Fund

End Domestic Abuse Wisconsin

Family Violence Appellate Project

Freedom Network USA

Georgia Coalition Against Domestic Violence

Housing and Economic Rights Advocates

Indiana Coalition Against Domestic Violence

Kansas Coalition Against Sexual and Domestic Violence

Maine Coalition to End Domestic Violence

Maryland Network Against Domestic Violence

Michigan Poverty Law Program

Missouri Coalition Against Domestic & Sexual Violence

National Domestic Violence Hotline

Nevada Coalition to End Domestic and Sexual Violence

NJ Coalition to End Domestic Violence

Ohio Domestic Violence Network

Public Justice Center

Rhode Island Coalition Against Domestic Violence

The Heartland Center for Jobs and Freedom

The Network: Advocating Against Domestic Violence

The Public Interest Law Project

ValorUS

Violence Free Minnesota

Washington State Coalition Against Domestic Violence & Sexual Assault

Western Center on Law and Poverty

Wisconsin Coalition Against Sexual Assault