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March 23, 2026

Submitted Via Email to infocollection@acf.hhs.gov.

RE: Federal Register 2026-01936, pgs. 4562-4563. PS Docket No. 23-239, RIN 0970-AC96 Comments in Response to proposed information collection as part of the Safe Access for Victims' Economic Security (SAVES) Demonstration research in the Child Support Services Program under the Administration for Children and Families Within the Department of Health and Human Services.

On behalf of the Texas Council on Family Violence (TCFV), we respectfully submit comments to the proposed information collection process within the Safe Access for Victims' Economic Security (SAVES) Demonstration research.

TCFV is the statewide coalition of family violence service providers and allied programs working to promote safe and healthy relationships by supporting service providers, facilitating strategic prevention efforts, coordinating community responses rooted in safety, and using policy and systems change to create opportunities for freedom from family violence. TCFV is a membership agency with over 1,500 members comprised of family violence programs, survivors of family violence, businesses, and other concerned Texans. Texas' Office of the Attorney General was previously a demonstration site in the SAVES project, in which TCFV was a collaborative partner.

Economic security and wellbeing are key to survivor and child safety. In a study of callers to the National Domestic Violence Hotline, as many as 73 percent of the survivors reported they stayed in abusive relationships longer than they otherwise would due to economic concerns.¹ In Texas alone, a 2019 study found that 37 percent of survivors stayed in or returned to an abusive relationship because they were worried about being able to meet their own or their children's medical needs without their partner's insurance or financial support.² Research finds that 90% of domestic violence victims want to pursue child support if they can do so safely.³

Access to child support can be a critical component of economic stability and safety for survivors of domestic violence, but it also presents significant risks. Survivors must weigh the potential financial benefits of seeking child support against the possibility of re-engagement with an abusive partner, retaliation, loss of confidentiality, or increased surveillance through the legal process. Many survivors avoid or disengage from child support services precisely because they fear these consequences. The SAVES Project seeks to address these truths through implementation of domestic violence-informed practices in this key system.

¹ Adams, A. E., Littwin, A. K., & Javorka, M. (2020). The frequency, nature, and effects of coerced debt among a national sample of women seeking help for intimate partner violence. *Violence Against Women*, 26(11), 1324-1342. <https://doi.org/10.1177/1077801219841445>.

² Wood, L., Backes, B.L., McGiffert, M., Wang, A., Thompson, J. & Wasim, A. (2019). Texas State Plan 2018: *Availability of services at Texas family violence programs and assessment of unmet needs of survivors of family violence*. Austin, Texas: The University of Texas at Austin Steve Hicks School of Social Work and Texas Council on Family Violence.

³ Griswold, E. A., Pearson, J., & Thoennes, N. (2000). New directions for child support agencies when domestic violence is an issue. *Policy & Practice of Public Human Services: The Journal of the American Public Human Services Association*, 58(29).

Regarding (a) *whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility*, we support the gathering of information, both qualitative and quantitative, from survivors, advocates, and child support staff to better understand safety barriers within the system. The perspectives of these three groups are essential to evaluating whether safety-focused interventions are effective. Survivors themselves are uniquely positioned to identify risks and unintended consequences that may not be visible to child support staff. It would be difficult to create a survivor-informed intervention focused on a time of known heightened safety concerns without asking survivors themselves these questions. Further, it could cause interventions to harm the survivor rather than create safety if they are not routinely evaluated. TCFV also recommends the domestic violence-informed collection of data from survivors who have participated in any enhanced version of the child support process as a result of the SAVES project in their state to determine if any SAVES-related changes have increased survivors' sense of safety in the process. We further recommend that researchers with a practitioner-based background be engaged and that they have expertise in research with survivors of intimate partner violence. We also highly suggest the state domestic violence coalition be involved.

Regarding (b) *the accuracy of the agency's estimate of the burden of the proposed collection of information*, it is difficult to assess without the ability to review the actual instruments. In the burden chart, for both Instruments 1 and 2, there is a burden estimate for the screener only, translating into five minutes. Not knowing what is in the screener, TCFV would have concern with any screening interaction with a survivor being only five minutes. Screening processes should allow sufficient time to explain the purpose of the research, confidentiality protections, potential risks, and the voluntary nature of participation. Meaningful informed consent means the survivor understands the risks and benefits and services are not contingent. Without knowing the content of any of the qualitative or quantitative tools, it is impossible to accurately estimate the burden. TCFV recommends that the burden be reconfigured following the development of the tool.

Regarding (c) *the quality, utility, and clarity of the information to be collected*, TCFV strongly recommends that each of the tools described, including the two screeners, be created in collaboration with a domestic violence-informed agency such as the state coalition, in addition to researchers who have been practitioners and who have expertise in research centered on intimate partner violence. Survivor-centered research should reflect the realities of post-separation abuse, coercive control, privacy risks, and the varied ways survivors interact with formal systems. As has been evident in the SAVES project, the greatest success and truest collaboration come from developing a survivor-focused tool *together*; not by a linear process which consists of researchers creating tools that external parties are only able to review for feedback, then returning back to the internal parties to unilaterally decide whether or not to adopt this feedback. A collaborative development process can help ensure questions are phrased in ways that are respectful, accessible, and relevant while reducing the risk of re-traumatization. Such a process also ensures that the data collected will produce actionable insights for improving safety.

Finally, regarding (d) *ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology*, TCFV supports the recommended combination of online and in-person quantitative

and qualitative collection methods so that survivors can choose the method that feels the safest and most accessible. Participation should not require survivors to disclose sensitive information at all and certainly not in settings where they may be monitored by an abusive partner or lack privacy. Researchers should also be prepared to pause or terminate participation if safety concerns arise. Any tool, however, must be developed with researchers who have expertise on intimate partner violence and in concert with survivors.

TCFV also suggests strong consent protocols be developed that are mindful of the trauma survivors have experienced and that any qualitative research starts with a discussion of those triggers and has a protocol for warm connections to advocacy and crisis support should the need arise. TCFV would be further remiss if we did not underscore that one of the most meaningful ways to acknowledge and reduce burden on survivors is to provide compensation for their time and expertise. Survivors must often arrange childcare, miss work, or expend emotional energy to participate in research, and compensation recognizes these contributions and helps offset any associated costs.

Finally, TCFV emphasizes the importance of confidentiality protections throughout the data collection process. Survivors' participation must not increase the risk that their location, personal information, or engagement with services could be disclosed to an abusive partner or others who may cause harm. Clear protocols should be established for data storage, de-identification, mandatory reporting obligations, and communication with participants to ensure that safety remains paramount.

TCFV thanks the Administration for Children and Families for the opportunity to submit public comment on this topic and appreciates the office's commitment to improving safe access to child support services for survivors of domestic violence.

For follow-up questions please contact: Molly Voyles, Director of Public Policy,
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