



at the heart of campus safety

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July 6, 2026

Director Russell Vought
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Re: Written Comments on Office of Management and Budget (OMB) Proposed Rule Change to Regulation for Federal Financial Assistance, OMB-2026-0034-0001

Dear Director Vought,

Clery Center offers these comments in regard to the proposed rule change to regulation for federal financial assistance. Clery Center was founded by Connie and Howard Clery after the brutal rape and murder of their daughter Jeanne in 1986 (after whom the Jeanne Clery Campus Safety Act (“Clery Act”)¹ is named). As a 501(c)(3) organization, Clery Center works with colleges and universities nationwide to create safer campuses. Utilizing nearly 40 years of experience and our comprehensive understanding of the Clery Act, we guide institutions through understanding and implementing its provisions by providing training, support, and technical assistance.

The Department of Justice (DOJ) recently outlined plans to consolidate the Office on Violence Against Women (OVW), the Office of Justice Programs and Office of Community Oriented Policing Services into a single Bureau of Justice Grants. The Department of Justice has indicated that they will seek OMB approval for this process of consolidation and keep Congress informed. This proposal appears inconsistent with the statutory requirement that OVW remain a “separate and distinct” office, and undermines the creation and purpose of the Office on Violence Against Women as outlined in the Violence Against Women Act.

The DOJ Office on Violence Against Women website directly states, “OVW was established as an independent office on January 30, 2004, pursuant to the Violence Against Women Office Act, Pub. L. No. 107-273, tit. iv. (2002) (codified as amended at 34 U.S.C. §§ 10442-10445). The Act directs that there shall be a “separate and distinct” OVW within the Department of Justice, “not subsumed by any other office[.]” Congress intentionally established OVW as an independent office to ensure dedicated and consistent expertise and leadership on issues of gender-based violence. It is unclear why the DOJ is proposing changes outside the law, putting both OVW’s effectiveness and its statutory mandate at risk. This will be detrimental to services and protections for survivors of domestic violence, dating violence, sexual assault, and stalking.

Constance B. Clery
*Co-Founder & Chairwoman Emerita
(In Memory)*

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Co-Founder (In Memory)

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¹Jeanne Clery Campus Safety Act, 20 U.S.C. §1092(f) [hereinafter “Clery Act”].



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The Office on Violence Against Women administers the Campus Grant Program, for which Clery Center has proudly served as the federal technical assistance provider for Clery Act compliance since 2009. As a long-standing participant in this program and stakeholder in the purpose of OVW, Clery Center is opposed to any effort that would weaken the independence and stature of OVW.

Additionally, a proposed rule by OMB would grant the executive branch seemingly unlimited discretion over federal grants, also contrary to existing federal law. Federal law clearly states the executive branch does not have the authority to add new programmatic requirements beyond what Congress has authorized. If implemented, this proposed rule would require federal agencies to design federal grant programs to align with an administration's priorities and policies. The Clery Act and the Violence Against Women Act, and all related amendments to both Acts, have long held strong bipartisan support in Congress. As the legislative body in our government, Congress is granted the power to authorize laws and appropriate funds to support programs established in law. It would be inappropriate to subvert Congressional authority and oversight of federal programs, and this proposed rule has the potential to cause instability in federal grant programs every four years. Colleges and universities in particular rely on consistent federal grant programs to build long-term prevention, response, and victim services programs. Frequent shifts in allowable activities or program priorities would undermine those sustained efforts.

Clery Center has the privilege of working with colleges and universities nationwide to create safer campus communities for all. In order to fulfill our mission, we need the ability to work with our partners in OVW to administer the Campus Grant Program, and the Grantees we serve need a stable, independent Office on Violence Against Women administering the program consistent with Congressional intent. OVW must continue to have independence as a standalone office inside of the DOJ, and OVW must maintain the Congressionally authorized ability to administer funds without an administration's direct involvement.

We respectfully urge OMB to reject any rulemaking that would undermine Congressional authority over federal grant programs or facilitate actions inconsistent with the statutory independence of the Office on Violence Against Women. Thank you for reviewing our concerns, and for the consideration of our comments prior to making final decisions.

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