



Turning Outrage Into Impact: How We Leveraged One Client’s Devastating Experience Into Systemic Change for Thousands

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In December 2022, a domestic violence shelter in Brooklyn referred a New York City Housing Authority (“NYCHA”) tenant to my organization. The tenant—a Black single mother and survivor of domestic violence—had been waiting a year for an “emergency transfer,”² most of that time in the shelter, away from her home. The first question that popped into my mind upon receiving the case was, “How is it that a survivor requests something called an ‘emergency transfer’ and one year later has not reached a safe home?”



We took the case and I contacted NYCHA’s law department to inquire about my client’s emergency transfer status. Incredibly, I was told that there were 130 survivors *ahead* of my client on the emergency transfers waitlist. Not only that, but my client told me that a few months into her tenure on the waitlist, she was violently attacked on the grounds of her building by someone associated with the perpetrator of abuse, landing in the hospital. Upon getting discharged, she immediately went to her management office to inform them of this attack and to request that her emergency transfer be expedited. NYCHA did nothing, forcing her to abandon her own home and move with her children to a domestic violence shelter.

And so, after a year of waiting and a violent attack, my client was *nowhere near* receiving her emergency transfer. We knew we had to act fast. This article outlines how we leveraged a single client’s experience into broader systemic reform, offering a practical roadmap for legal services advocates to

identify root causes, build strategic pressure, and translate individual representation into durable policy change that improves outcomes for entire communities.

Identifying the Root Problem

As I started working on the case, I quickly identified the root cause of the problem—for some inexplicable reason, NYCHA’s transfer regulations placed tenants with emergency transfers under the Violence Against Women Act (“VAWA”) in its lowest priority category.

Conversely, NYCHA’s regulations placed transfer requests from people with disabilities in its highest priority category. Because my client was receiving medical treatment in connection with the domestic violence she experienced, I sought to convert her pending emergency transfer to a reasonable accommodation transfer and, upon approval, she jumped from #131 on the emergency transfer waitlist to #2 on the reasonable accommodation transfer waitlist. Two months later, my client was finally offered a transfer apartment and reached a safe home.

This dramatic result showed how much the difference in transfer prioritization mattered—intentionally or not, NYCHA was placing survivors at grave risk of further harm by giving them the lowest transfer priority.

Expanding Services

With the insights we developed in the case presented above, we opened our intake streams to NYCHA emergency transfer cases and established collaborations with local domestic violence rights organizations to provide them with legal support and accept case referrals.

Soon enough, we developed a small docket of cases in which we employed various strategies to speed up clients' emergency transfers, a line of work that was largely new for our organization.

Collecting Data

Simultaneously, we submitted a public records request (in New York known as a Freedom of Information Law request) to NYCHA for data related to all transfer reasons and categories. The data helped us gain a clearer picture of what we already believed was the large-scale problem of domestic violence survivors—overwhelmingly Black and Latinx women—waiting years for an emergency transfer, including that:

- NYCHA had approximately 2,000 domestic violence survivors who on average were waiting nearly 800 days for an emergency transfer.
- At the close of 2023, survivors had the same priority level as 14,000 other tenants seeking transfers for non-emergency reasons, such as having empty bedrooms in their home or seeking to be closer to work.
- Beginning with the pandemic and over the next five years, NYCHA accumulated more than 6,000 vacancies in its apartment turnover division, causing the average apartment turnover rate to shoot up from 98 days to 424 days. This factor fueled a vacant units crisis at NYCHA, with upwards of 8,000 vacant apartments by 2025.

The data confirmed that fixing the exceedingly low emergency transfers priority level was step one in addressing the years-long transfer delays faced by survivors. The data also gave us a window into an even bigger problem: NYCHA's vacant units crisis which affected all tenants seeking transfers but predominantly those in the lowest priority categories.

Advocating on the Inside

With the benefit of our ongoing individual client casework and the public records data, we met with NYCHA's general counsel's office in the summer of 2024 to advocate for solutions.

NYCHA readily acknowledged the problem and committed to increasing the priority level of emergency transfers, though on an open-ended timeline.

With NYCHA leadership on notice, our next step was to memorialize and spotlight the problem by issuing an advocacy report, which also allowed us to engage the media to bring publicity to the plight of domestic violence survivors seeking what—no one

denied—should be quick and efficient emergency transfers.

Creating a Public Record of the Problem

Our advocacy report, titled *“Trapped in Danger — How NYCHA Puts the Lives of Gender-Based Violence Survivors at Risk by Delaying Emergency Transfers,”*³ published on December 17, 2024, included: (1) the stories of our clients Sarah, Jessica, Elizabeth, and Frances (all referenced by their first names only to protect their identity as survivors); (2) a review of the central role that safe and affordable housing plays in the ability of survivors to escape abuse and address its long-lasting health consequences;⁴ and (3) our organization's analysis of federal and local regulations governing emergency transfers.

We delivered a set of recommendations to NYCHA, including increasing the transfer priority of emergency transfers, tackling the vacant units crisis, expanding the availability of transfer options for survivors, and hiring a VAWA coordinator to establish collaborations with domestic violence rights organizations to protect survivors.

Engaging Elected Officials and Community Partners

Working closely with our communications department, we were able to obtain the support of nearly a dozen elected officials and nonprofit leaders as well as robust media coverage and, in June 2025, the needle finally moved—NYCHA announced as part of its FY26 annual plan that it would be revamping its transfers regulations to in part ensure “that transfers under the Violence Against Women Act (VAWA) and related categories are prioritized, comparable to other urgent requests.”⁵

Moreover, that same month, the Committee on Public Housing of the New York City Council held a public hearing on NYCHA vacant units and transfers and, in his opening remarks, Committee Chair Chris Banks noted that “[a] December 2024 report by Legal Services NYC found that survivors of gender-based violence are sometimes waiting years for a transfer despite being in danger in their current housing, and that is simply unacceptable.”⁶

Continuing the Push for Change

The changes NYCHA proposed as part of its FY26 administrative plan were a step in the right direction—emergency transfers were elevated to the top priority category alongside reasonable accommodations

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transfers, and NYCHA designed a new rotation system to give both types of transfers additional selection opportunities. However, NYCHA was still giving a higher priority to certain non-emergency transfers which is contrary to federal VAWA regulations.⁷ In addition, NYCHA did not adopt our additional recommendations in our December 2024 report, such as expanding the transfer options for survivors or hiring a VAWA coordinator. And so, when NYCHA put up its FY26 plan for public comment, we submitted a lengthy comment letter detailing the plan's shortcomings.

The FY26 plan became final in October 2025, at which point we engaged in a fresh round of media advocacy to highlight the positives and the shortcomings of NYCHA's amendments to its transfer regulations. Once again, we worked together with our communications department to elicit support from elected officials and nonprofit leaders and obtain robust media coverage, which led to New York State Assembly Member Yudelka Tapia's office reaching out to work together on legislation to implement the full set of recommendations in our December 2024 report.

To that end, A10111 was introduced in the New York State Assembly in February 2026 to require public housing authorities across New York State to give the highest priority to transfer requests from domestic violence survivors, people with disabilities, and other at-risk tenants, together with additional measures to protect the safety and well-being of such populations.⁸

We continue to advocate for these much-needed changes.

Lessons Learned for Leveraging Individual Client Experiences into Systemic Advocacy

Reflecting on an advocacy project that began with a single case and grew into proposed statewide legislation, a few themes emerged that may help direct legal services organizations better translate individual client experiences into broader systemic advocacy:

- **Think Big and Be Curious.** When I worked with my first client on this issue in late 2022, I did not know that NYCHA emergency transfers would become an impact advocacy project in earnest. Such realization took place as we represented more clients and discovered that this was a widespread problem rooted in NYCHA's policies and operations. At that point, there was no turning back—we went from one client to the next and onto a public

records requests, comment letters, agency-level advocacy, report writing, media advocacy, public testimony, and legislative advocacy, at every turn taking stock of the progress made and the road ahead toward the ultimate goal, which was (and is) to force NYCHA to do everything in its power to prioritize the safety of domestic violence survivors. Curiosity is crucial—never stop asking yourself what more you can do with the information and resources you have.

- **Think Strategically.** In this project, the fact that emergency transfers are governed by federal laws and regulations, but NYCHA is a state-created housing authority that is run by the City of New York, essentially meant that advocacy at all levels of government was in theory possible—before the Department of Housing and Urban Development, the New York State Legislature, the New York City Council, and NYCHA itself. To be sure, ongoing strategizing is inherent to litigation (for example, figuring out how to turn discovery into a summary judgment motion or a winning trial plan). In the realm of impact advocacy, however, the universe of next steps you could take at any given juncture can be much broader, largely unrestrained by the confines of procedural rules or litigation do's and don'ts. Within such a framework, it is all the more important to constantly assess all available advocacy options and how they interact with each other.
- **Employ an “All Hands on Deck” Approach.** Be as flexible as possible with staffing and funding. At Legal Services NYC, advocates across our five borough offices often collaborate on NYCHA-related impact work because tenants across the city face similar issues. I previously led the litigation team in *Fields v. Russ*,⁹ a federal lawsuit in the Southern District of New York that transformed NYCHA's rent collection and eviction practices benefiting hundreds of thousands of public housing residents. In that litigation, both our clients and litigation team came from all five New York City boroughs. Similarly, our clients featured in our December 2024 advocacy report came from different boroughs and the co-authors team spanned various locations and practice areas. Impact advocacy often requires us to look beyond our typical office, practice area, or funding boundaries. It is not always feasible to operate outside of such bounds, but we should never stop identifying opportunities where we can operate flexibly to achieve the greatest impact for our clients.

■ **Don't Get Discouraged!** As I'm writing this article, I have reminded myself of the resources we have in New York City that many legal services organizations across the country lack. We are the largest civil legal services office in the nation, with five borough offices each with its own legal director plus an additional litigation leadership team at our central office. We have the ability to carry out impact litigation and advocacy in ways that others may not. That said, I believe the approach I have laid out in this article for how to leverage individual client experiences into systemic change can be carried out anywhere. Even for the organization boasting the title of "the largest legal services organization in the country" it is simply not possible to undertake every single impact litigation or advocacy project we would like to pursue. But what we always can (and should) do is take action the moment we identify the root cause of a problem affecting our organization's clients. Taking action starts with having the necessary internal (with staff, managers, and leadership) and external (with community organizers, partner organizations, and sister legal services offices) conversations to see what type of advocacy approach is achievable.

■ An organization may not have the resources to file a multi-plaintiff lawsuit in federal court, but an advocacy report will typically be a much lighter lift and could be just as impactful. Pursuing an appeal on behalf of one client could produce favorable appellate authority benefitting thousands. Pro bono partnerships could make impossible-seeming litigation a reality. Inserting your organization into national coalition efforts may strengthen the scope and reach of such efforts. Impact can look many different ways. Ultimately, the goal is to make sure we are doing everything we can to assist our clients in building power and control over their lives and communities.

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- 2 Emergency transfers are a mechanism introduced by the Violence Against Women Reauthorization Act of 2013 whereby a survivor of domestic violence, dating violence, sexual assault, or stalking may request a transfer to another safe unit if they reasonably believe that they are at imminent risk of further violence where they currently reside. 42 U.S.C. § 12491(e).
- 3 Available at <https://www.legalservicesnyc.org/wp-content/uploads/2024/12/LSNYCs-Trapped-in-Danger-Report-2024.pdf>.
- 4 For this section, our report quoted heavily from New Destiny Housing, "A Crisis Compounded: The Dual Crises of Domestic Violence and Homelessness," July 2024, available at <https://newdestinyhousing.org/wp-content/uploads/DV-Report-1.pdf>.
- 5 New York City Housing Authority, "Public Housing Agency Plan for FY26, Attachment M," available at https://www.nyc.gov/assets/nycha/downloads/pdf/Attachment_M_Changes_to_the_Tenant_Selection_and_Assignment_Plan_TSAP.pdf.
- 6 New York City Council, Public Housing Committee Hearing on NYCHA Vacancies and Transfers, June 16, 2025, available at <https://councilnyc.viebit.com/embed/vod?v=P6Neb9AibCuduyQI&s=true&d=false>.
- 7 See 24 C.F.R. § 5.2005(e)(6) (providing that emergency transfer under VAWA shall "receive, at a minimum, any applicable additional priority that housing providers may already provide to other types of emergency transfer requests."). According to a report by the Government Accountability Office, VAWA emergency transfers should be alongside other types of emergency transfers due to, for example, "physical hazards (such as fire damage or a gas leak), natural disasters, or a verified medical condition of a life-threatening nature." Government Accountability Office, "Rental Housing - Opportunities Exist to Improve Oversight of Assistance to Survivors of Domestic Violence or Sexual Assault," July 2024, available at <https://www.gao.gov/assets/gao-24-106481.pdf>.
- 8 New York State Assembly Bill A10111, 2025-2026 Legislative Session, available at <https://www.nysenate.gov/legislation/bills/2025/A10111>.
- 9 *Fields v. Russ*, 1:19-cv-11368 (ER).