

April 30, 2026

Regulations Division

Office of General Counsel

Department of Housing and Urban Development

Re: Docket No. FR-6520-P-01, RIN 2501-AE15, Establishing Flexibility for Implementation of Work Requirements and Term Limits

Submitted via www.regulations.gov

The undersigned organizations, consisting of housing, nutrition, health care, child-focused, faith-based and civil rights organizations dedicated to ending poverty, strongly oppose the proposed rule *Establishing Flexibility for Implementation of Work Requirements and Term Limits*, Docket No. FR-6520-P-01, which would allow public housing authorities and subsidized housing owners to impose work reporting requirements and term limits as conditions of continued housing assistance. This proposed rule will destabilize millions of families with low incomes at great costs to providers. We urge HUD to withdraw this rule.

Work requirements and time limits will not increase employment or self-sufficiency. They will cause housing instability, hunger, and adverse health outcomes. Thirty years of evidence from Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) proves that work reporting requirements reduce participation in benefit programs without meaningfully increasing employment or earnings. These policies kick eligible people who work or qualify for an exemption off assistance because they struggle to navigate documentation requirements; endure unexpected life events like getting laid off becoming a caregiver for a parent; or experience a sharp reduction in their hours. This rule ignores the cruel housing and labor markets that plague people with low incomes.

Congress created the Moving to Work (MTW) demonstration program to test policy options that encourage self-sufficiency. Expanding work requirements and term limits to providers without MTW status is illegal and short-sighted. At least seven of the sixteen PHAs that adopted work requirements under MTW later abandoned them as punitive and unworkable, and eleven of seventeen that implemented time limits later removed them after finding that residents reaching the end of their assistance periods still could not afford market-rate housing. HUD's evidence base for this rule rests almost entirely on a single study of 123 households at the Charlotte Housing Authority, which combined a work requirement with intensive supportive services that this rule does not require, or fund.

Even steady low-wage work does not cover the cost of housing. Therefore, working families will lose their housing because of this rule. The primary reason that households continue to receive housing subsidies for multiple years is that housing costs too much for even full-time workers in jobs that pay low wages to afford. The National Low-Income Housing Coalition's Out of Reach report shows that even in the lowest cost of living states, a minimum wage worker must work more than full time to be able to afford even a one-bedroom apartment at the fair market rent. Additionally, it is common for workers with low-wage jobs to have schedules that change from week to week. Hour variability would make it hard for workers in food service, retail, home health care, and other industries to document a consistent 20 to 40 hours per week.

Losing housing assistance destabilizes families, with long-lasting consequences on children. Eviction disrupts every aspect of a family's life at once, straining their budget. Research consistently links eviction to worse health outcomes, and lasting harm to children's academic achievement and earnings in adulthood. Furthermore, once a family loses subsidized housing assistance, they are extremely unlikely to regain it. Waiting lists for housing vouchers and public housing are years long in most jurisdictions. A family that loses assistance due to a temporary disruption in hours due to an illness, a caregiving emergency, or a shift cut faces years of consequences, not months. Moreover, unlike SNAP and Medicaid, the NPRM would allow full-family evictions based on one household member's non-compliance or reaching the time limit, including households with young children.

Exemptions will fail to protect people who can't work. People who are exempt from work requirements or time limits still must submit documentation proving their exemption regularly. Therefore, these requirements act as a barrier to participation for people who should qualify for an exemption from the requirements due to disability, caregiving or other factors that limit their ability to work consistently. Disability exemptions often leave out people with significant but partial work limitations, mental health conditions, and/or other episodic impairments. Research from SNAP and TANF consistently finds that people with physical and mental health conditions are disproportionately likely to be sanctioned for failing to meet work requirements, not because they are able to work, but because the same conditions that limit their ability to work also make it harder to navigate paperwork, attend appointments, and document eligibility for exemptions. Discrimination in both employment and health care means that people of color would be disproportionately impacted by these requirements.

This rule will reduce housing availability and harm the communities it claims to serve. Work requirements and time limits break the core value proposition that makes landlords willing to accept housing vouchers: guaranteed, reliable rent payments. Should a family have their assistance discontinued because they missed a week, the

landlord has no guarantee that rent will be paid for the month. Studies in multiple cities have found voucher rejection rates exceeding 80 percent in low-poverty neighborhoods, even without the added administrative burden of navigating work reporting requirements. Further reducing landlord participation will push voucher holders into higher-poverty areas with fewer job opportunities, directly undermining HUD's stated goals of economic mobility and mixed-income communities.

For these reasons, we urge HUD to withdraw this proposed rule.

Sincerely,

National

Autistic People of Color Fund
Center for Law and Social Policy
Children's Defense Fund
Coalition on Human Needs
Companions and Animals for Reform and Equity
Health in Partnership
League of Latin American Citizens (LULAC)
Legal Action Center
LIFT
National Association of Social Workers
National Center for Children in Poverty
National Center for Youth Law
National Coalition for the Homeless
National Disability Rights Network (NDRN)
National Domestic Violence Hotline
National Legal Aid & Defender Association
National Network to End Domestic Violence
National Rural Social Work Caucus
National Women's Law Center
NETWORK Lobby for Catholic Social Justice
Popular Democracy
RESULTS
The Partnership for Inclusive Disaster Strategies
TechTonic Justice
Youth Law Center

State and Local

California

California Association of Food Banks
California Latinas for Reproductive Justice
California Partnership to End Domestic Violence
Coalition of CA Welfare Rights Organizations
Community Action Marin
End Child Poverty California

Connecticut

Greater Hartford Legal Aid
New Haven Legal Assistance Association Inc.

District of Columbia

Legal Aid DC
Mother's Outreach Network

Florida

Disability Rights Florida

Illinois

Illinois Coalition for Immigrant and Refugee Rights
Legal Council for Health Justice
The Porchlight Collective SAP

Indiana

Indiana Community Action Poverty Institute

Michigan

Center for Civil Justice
Community Economic Development Association of Michigan (CEDAM)
Lighthouse MI

Minnesota

Minnesota Disability Law Center

Nebraska

Disability Rights Nebraska

New Hampshire

Disability Rights Center - NH
New Hampshire Legal Assistance

New Jersey

Disability Rights New Jersey

New Mexico

New Mexico Coalition to End Homelessness

New York

NYC Family Policy Project

Women in Need (WIN)

North Carolina

Disability Rights North Carolina

Pisgah Legal Services

Ohio

Kinnect

Ohio Poverty Law Center

Oregon

Path Home

Pennsylvania

Catapult Greater Pittsburgh

Disability Rights Pennsylvania

Just Harvest

Housing Alliance of Pennsylvania

Pennsylvania Public Health Association

South Carolina

Disability Rights South Carolina

Utah

Crossroads Urban Center

Vermont

Vermont Legal Aid

Voices for Vermont's Children

Virginia

Northern Virginia Affordable Housing Alliance (NVAHA)

Washington

Statewide Poverty Action Network

Solid Ground

Washington Low Income Housing Alliance

Northwest Health Law Advocates

West Virginia

Prevent Child Abuse West Virginia

TEAM for West Virginia Children

Rise Up WV

Unitarian Universalist Congregation of Charleston

West Virginia NOW