

## How to Comment on HUD's Proposed Rule Cutting Housing Benefits

This guide provides an overview of how you or your organization may comment on HUD's proposed rule cutting housing benefits: ["Establishing Flexibility for Implementation of Work Requirements and Term Limits" \(FR-6520-P-01\)](#). **The deadline to submit comments is Friday, May 1, 2026, at 11:59pm Eastern.** The attached template provides an example comment, but you should customize the template with your original comments. Form letters will not be considered, so your comments should be original and should not be copied from materials from other submitted letters or comments. Some suggested topics to include in your comments are listed below. NHLP and our partners have created these resources to assist with commenting: [one-pager](#), [fact sheet](#), [potential impact for every state](#), and [our compilation of research on work requirements and time limits](#).

### If you are a legal aid attorney or tenant advocate:

- Reasons why HUD may lack the legal authority to implement the proposed rule.
- What impact work requirements or time limits would have on your clients.
- Your experience with renters in subsidized housing who are already working.
- What impact it will have on renters if different HUD housing providers apply a patchwork of variable work requirements and time limits in your communities.
- Discuss what the root causes of lack of affordable housing are in your area and how work requirements and time limits will not address those root causes.

### If you are in jurisdiction which is part of the [Moving to Work \(MTW\) demonstration program](#):

- Renters' experiences with their public housing authority's MTW program's work requirements or time limits, including what challenges renters faced in MTW jurisdictions.
- What the costs to your public housing authority were to implement MTW.
- Whether there was any research on the MTW program in your jurisdiction or anecdotal evidence of the impact of MTW work requirements and time limits on tenants.

### If you are an advocate for survivors of domestic violence:

- What impact the lack of any exemptions for survivors in the proposed rule will have.
- What impact a patchwork of exemptions will have on survivors.

### If you are an advocate for disabled renters:

- Whether the definitions and hardship exceptions in the proposed rule provide adequate protections for disabled renters.
- Challenges that tenants who experience disabilities will face to comply with the paperwork requirements related to work requirements or time limits.

### If you are a tenant in subsidized housing:

- Your own experience in subsidized housing, and how the proposed rules would impact your family, your housing, and your community.
- If you had experience with the Moving to Work or Family Self-Sufficiency programs, why those models may be better to improve job opportunities and economic mobility.

## How to Submit Comments

You can submit comments by [going to this link and clicking on "Comment."](#) You can upload your comments as a document or type them into the text box. More guidance about [submitting comments is at this link](#) and [in this FAQ](#). **The deadline to submit comments is Friday, May 1, 2026, at 11:59pm Eastern.** If you have questions about your comments, the commenting process, or are an LSC-funded firm and need guidance on how to comment on proposed rules, please contact Korey Lundin at [klundin@nhlp.org](mailto:klundin@nhlp.org). Updated March 2, 2026

[DATE]

RE: Establishing Flexibility for Implementation of Work Requirements and Term Limits (FR-6520-P-01)

Regulations Division, Office of General Counsel, U.S. Department of Housing and Urban-Development,

On behalf of [ORGANIZATION], I am submitting comments on the Department of Housing and Urban Development's (HUD) proposed rule change published in the Federal Register on March 2, 2026, Establishing Flexibility for Implementation of Work Requirements and Term Limits (FR-6520-P-01). We ask that HUD withdraw the proposed rule in its entirety.

At [ORGANIZATION], we [INSERT DESCRIPTION OF YOUR WORK]. This work provides us with unique insight on how work requirements and time limits will impact renters in [LOCATION]. [IF YOU ARE COMMENTING ONLY ON A PARTICULAR SECTION, STATE THAT HERE]

HUD lacks the legal authority to implement work requirements and time limits. Congress has not delegated this authority to HUD. Currently, only certain federally assisted housing providers that participate in the Moving to Work program can establish work requirements and time limits. HUD's proposed rule is a huge departure from how most HUD programs are currently administered by local Housing Authorities and owners of HUD multifamily housing.

Work requirements and time limits will not increase self-sufficiency for HUD tenants. In fact, decades of research on work requirements and time limits suggest they do not lead to self-sufficiency. Housing is still unaffordable to workers making an average wage across the country. [INSERT LOCAL DATA ON HOUSING COSTS FROM [NLIHC'S OUT OF REACH REPORT](#)]

Work requirements and time limits will create more administrative burdens for public housing authorities, private owners, and the communities they serve. Creating a patchwork of different work requirements and different time limits for various types of subsidized housing in different locations dramatically increases confusion for both renters and property owners. These policies will be costly for property owners to implement, leading to more bureaucracy and additional stress on the nation's affordable housing stock.

[DESCRIBE YOUR ANALYSIS OF THE PROPOSED RULE AND HOW IT WOULD IMPACT YOU OR THE PEOPLE YOU HELP]

[ORGANIZATION] therefore urges HUD to withdraw this proposed rule. Allowing work requirements and time limits does nothing to promote HUD's mission of providing affordable housing. The proposed rules will only result in vulnerable renters losing their housing. Thank you for the opportunity to comment on these proposed rules, and if you have any questions or concerns about these comments, please contact me at [E-MAIL ADDRESS].

Sincerely,

[SIGNATURE BLOCK]