

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" \(FR-6520-P-01\)](#). This rule would allow PHAs and subsidized housing owners to impose work reporting requirements and time limits as conditions of continued housing assistance. The attached template provides example arguments for a comment opposing the rule, but you should customize the template with your unique perspective. Form letters will not be considered, so your comments must be original. NHLP, CLASP, and our partners have created these resources to assist with commenting: [one-pager](#), [fact sheet](#), [legal analysis](#), [potential impact for every state](#), and [our compilation of research on work requirements and time limits](#).

The deadline to submit comments is Friday, May 1, 2026, at 11:59pm Eastern.

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 NHLP at klundin@nhlp.org and Jesse Fairbanks at CLASP at jfairbanks@clasp.org.

Updated March 26, 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.

[INTRODUCE YOUR ORGANIZATION AND ITS MISSION IN 2-3 SENTENCES. Example: "I am writing on behalf of the Center for Law and Social Policy, which advocates to end poverty among people with low incomes nationwide]. We work directly with [POPULATIONS YOU SERVE] who receive housing assistance through [PUBLIC HOUSING/HCV/PBRA]." This work provides us with unique insight into how work requirements and time limits will impact renters in [LOCATION]. [IF YOU ARE COMMENTING ONLY ON A PARTICULAR SECTION, STATE THAT HERE]

We are in strong opposition to this proposed rule, which would allow PHAs and subsidized housing owners to impose work reporting requirements and time limits as conditions of continued housing assistance. Based on extensive evidence from other benefit programs and from the Moving to Work (MTW) demonstration, we are confident these policies will not increase employment or self-sufficiency, but will cause housing instability, eviction, and homelessness, with lasting harm to children and families.

[PULLING FROM ANY OF THE ARGUMENTS ENUMERATED BELOW, 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.

Our comments include citations to supporting research for the benefit of HUD in reviewing our comments. We direct HUD to each of the items cited and made available to the agency through active hyperlinks and as attachments, and we request that these, along with the full text of our comments, be considered part of the formal administrative record on this proposal. Thank you for the opportunity to comment on this proposed rule.

Sincerely,

[SIGNATURE BLOCK]

ARGUMENTS TO CUSTOMIZE IN YOUR ORIGINAL COMMENT

1. HUD lacks the legal authority to implement work requirements and time limits

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.

2. This rule will irreversibly destabilize children and families

This proposed rule would allow a PHA to evict an entire family, including young children, because one adult member failed to meet the hours requirement. This is not hypothetical: the Arkansas statute HUD cites as a model explicitly calls for terminating assistance for *any household* with a non-compliant able-bodied adult.¹ Eviction disrupts every aspect of a family's life simultaneously. It forces children to change schools, disrupts employment, and in many cases leads directly to homelessness. A recent NBER study found that eviction significantly reduces children's academic achievement and graduation rates.² [If you have specific stories about the harms caused by loss of housing assistance, add them here.]

Moreover, once a family loses subsidized housing assistance, they are extremely unlikely to regain it. [Add information about the waiting lists for housing assistance in your area. If you do not have this information, you can just say "Waiting lists for housing vouchers and public housing are an average of X years long in my state."] A family that loses assistance due to a temporary disruption in work hours, such as an illness, a shift cut, or a caregiving emergency, faces years of consequences, not months.

3. Work requirements and time limits will not increase self-sufficiency or employment rates among HUD tenants

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. Random assignment evaluations of welfare-to-work programs found that employment increases among individuals subject to work requirements were modest and faded over time; in nearly all programs evaluated, employment among recipients *not* subject to work requirements was the same as or higher than among those subject to them within five years.³

All the positive benefits that HUD claims are based on one study of the Charlotte Housing Authority, with just 123 households in the treatment group.⁴ The broader Moving to Work experience tells a different story.⁵ At least seven of the 16 PHAs that adopted work requirements later changed or discontinued them because they were found to be punitive or too difficult to administer, and because "noncompliant" households faced significant barriers to work. Similarly, 11 of 17 MTW PHAs that fully implemented time limits later removed them, including because households reaching the end of their assistance periods were still far from able to afford market-rate housing.⁶ The Tacoma Housing Authority ended its time limit program after finding that only 6 percent of participants achieved self-sufficiency by program exit.⁷ [If you have state or local specific information about the failure of work requirements and time limits in housing or other programs, include it here.]

4. No funding is provided for any supportive services

Providers succeed at increasing self-sufficiency among recipients when they offer meaningful supportive services, such as childcare. The Charlotte program cited in HUD's proposed rule combined a work requirement with intensive, directly provided supportive services including life coaches, case management, and

workforce development partnerships.⁸ The proposed rule funds none of these services. Participating agencies are required to provide supportive services, but a simple referral to the local career center or childcare resource and referral agency would be sufficient to meet this requirement. The proposed rule explicitly prohibits use of HCV administrative fees or project funds to pay for supportive services and does not offer any new funding. Referring people to already underfunded and overwhelmed service providers is not providing services. [Add information you may have about waiting lists for childcare, lack of transportation, how little job training is provided by WIOA agencies in your area. If you have information about the services provided by another high quality program, and the costs of providing those services, add them here.]

5. This rule will force working families out of their homes

The primary reason families remain in subsidized housing for extended periods is not lack of effort, it is that wages are too low to cover market rents. [Add your own information here about the cost of housing in your area as it compares to the earnings of low-paid workers. The [Out of Reach report](#) has data by state and for many metropolitan areas.⁹ You may also want to include data from [this CBPP report](#), which has state level data to complete this sentence: “CBPP estimates that of the xxx people who would lose assistance due to a broadly applied 2 year time limit, yyy are already in working families.”¹⁰]

Workers in low-wage jobs face particular risk from work reporting requirements. Research consistently documents that retail, food service, and other low-wage jobs involve highly variable and unpredictable hours, often shifting by 10 or more hours per week.¹¹ The proposed rule allows work requirements of up to 40 hours per week, a threshold no MTW demonstration has ever used¹² and that would expose seasonal workers, on-call workers, and those whose employers deliberately limit hours to constant risk of losing their housing. [If your organization serves families in a specific sector/industry, you may want to add a sentence here about the specific scheduling challenges your clients face. Depending on your focus, you may want to add data about how younger workers, workers of color, and workers with disabilities are less able to find consistent full-time work.]

6. This rule will reduce the availability of affordable housing by driving landlords out of the HCV program

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. Additionally, these policies will be costly for property owners to implement. Added bureaucracy for property owners could add additional stress on the nation’s affordable housing stock.

Housing Choice Voucher landlord participation is already deeply constrained. Studies in Philadelphia, Fort Worth, and Los Angeles found voucher rejection rates exceeding 80 percent in low-poverty neighborhoods.¹³ Work requirements and time limits break the core value proposition for landlords: reliable, guaranteed rent payments.¹⁴ They will further reduce the pool of willing landlords, further concentrating voucher holders in higher-poverty areas with fewer job opportunities, undermining the program’s own goals. [If your organization is a housing provider or works closely with PHAs, include 1-2 sentences about your anticipated administrative burden. For example: “Implementing and monitoring work requirements would require significant new staff capacity that our organization does not have and cannot fund from existing program resources.” In Arkansas, Fort Smith Housing Authority’s executive director noted that compliance would require hiring at least one new full-time employee, an impossible burden for the many small, rural PHAs that operate with one or two total staff.¹⁵ This is also a good place to talk about the costs involved with increased turnover of subsidized units, including maintenance and extended vacancies. If you have area-specific information about voucher rejection rates, other problems with finding -housing using the HCV, or the concentration of voucher use in

areas of high poverty/low jobs/poor schools, please include it here.]

7. State and local government may force compliance with the rule

HUD dismisses its own analysis of the costs and burdens work requirements and time limits will impose on PHAs by saying that only those that determine that the benefits exceed the costs will take up the option under this rule. However, it ignores the reality that state mandates could force unwilling PHAs to take up the “options.” As the rule acknowledges, Arkansas has already enacted legislation requiring PHAs to impose work requirements; its law calls for terminating any household with a non-compliant adult within 60 days.¹⁶ If HUD makes these requirements permissible, more states will follow Arkansas’s lead, and PHAs will have no choice to implement them. [If your state has had similar legislation introduced, or enacted laws preventing the SNAP agency from requesting ABAWD waiver in areas of high unemployment, discuss them here.]

8. The exemptions for certain populations are inadequate and will not prevent them from losing assistance

Work requirements act as a barrier to participation across all programs, including 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. People who are exempt from work requirements or time limits still have to submit documentation proving their exemption regularly. I am particularly concerned that this rule will lead to people in [INSERT POPULATION] losing their housing. [You can add information here about barriers to housing security or outsized homelessness rate among this population]

a. People with disabilities will lose assistance because of work requirements, even if they are exempt

Evidence from other programs suggests that individuals with disabilities often do not receive an exemption. For example, an Ohio study found that one-third of the people referred to a SNAP employment program reported a physical or mental limitation. Of those, 25 percent indicated that the condition limited their daily activities, and nearly 20 percent had filed for Disability/SSI within the previous two years.¹⁷ People with serious conditions that limit work but do not make it completely impossible would especially be at risk of losing benefits. CPS data finds that more than 14 percent of the individuals who would be considered “work-eligible” under HUD’s definition self-report as having a work-limiting disability.¹⁸ [If your organization works with people with disabilities or you might personally face challenges because of this rule, you can add more information here.]

b. Working parents and caregivers will lose assistance

The proposed rule exempts from the work requirement primary caregivers who are defined as individuals who bear primary responsibility for the care for any dependent child under the age of six years, of children or adults with disabilities in the tenant family, or of elderly or temporarily incapacitated individuals in the tenant family. Importantly, this definition leaves out parents of elementary school age kids, as well as caregivers for people with disabilities or seniors outside of the tenant family. This definition misses a lot of people with major caregiving responsibilities for people outside the immediate household, such as a grandparent providing child care so an adult child who does not live with them can work, or an adult child providing critical assistance to a parent that allows them to live independently rather than in a care setting. [If your organization works with caregivers or you might personally face challenges because of this rule, you can add more information here.]

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- ¹ Ark. Code Ann. § [14-169-109](#).
- ² Robert Collinson et al, [The Effects of Eviction on Children](#), National Bureau of Economic Research, April 2025.
- ³ LaDonna Pavetti, [Evidence Doesn't Support Claims of Success of TANF Work Requirements](#), Center on Budget and Policy Priorities, April 3, 2018.
- ⁴ William Rohe, Michael Webb, and Kirstin Frescoln, [Work Requirements in Public Housing: Impacts on Tenant Employment and Evictions](#), Social Science Research Network, September 22, 2015.
- ⁵ Claudia Aiken and Ellie Lochhead, [Policy at a crossroads: What We Know About Work Requirements and Time Limits in Federal Housing Assistance](#), Local Housing Solutions, September 3, 2025.
- ⁶ Aiken and Lochhead.
- ⁷ Tacoma Housing Authority, [Assessment of the Housing Opportunity Program](#), December 2021.
- ⁸ Rohe et al.
- ⁹ [Out of Reach: the High Cost of Housing](#), National Low Income Housing Coalition, 2026.
- ¹⁰ Will Fischer and Erik Gartland, [Rental Assistance Time Limits Would Place More Than 3 Million People – Half of Them Children – at Risk of Eviction and Homelessness](#), Center on Budget and Policy Priorities, 2025.
- ¹¹ Lauren Bauer, Chloe East, and Olivia Howard, [Low-Income Workers Experience – by Far – the Most Earnings and Work Hours Instability](#), Brookings Institution, 2025; Michael Karpman, Heather Hahn, and Anuj Gangopadhyaya, [Precarious Work Schedules Could Jeopardize Access to Safety Net Programs Targeted by Work Requirements](#), Urban Institute, June 2019.
- ¹² NPRM, <https://www.federalregister.gov/d/2026-04095/p-61>
- ¹³ Mary Cunningham et al, [A Pilot Study of Landlord Acceptance of Housing Choice Vouchers](#), HUD Office of Policy Development and Research, September 2018.
- ¹⁴ Philip M.E. Garboden et al, [Urban Landlords and the Housing Choice Voucher Program](#), HUD Office of Policy Development and Research, May 2018.
- ¹⁵ Tess Vrbin, [Proposed Work Requirement for Federal Housing Assistance Advances in Arkansas House](#), Arkansas Advocate, February 2, 2023.
- ¹⁶ Ark. Code Ann. § [14-169-109](#).
- ¹⁷ Ohio Association of Foodbanks, [Comprehensive Report: Able-Bodied Adults Without Dependents](#), 2015,
- ¹⁸ Original analysis of data from IPUMS CPS ASEC 2021–2025 pooled. Adults ages 18-61, not in school, not a parent of a child under 6, and not receiving SSI or Social Security benefits (including SSDI) are considered “work-eligible” following the NPRM specifications. IPUMS CPS, University of Minnesota, <http://www.ipums.org>.