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When complete, save, upload, and submit your comments via [regulations.gov](https://www.regulations.gov) by 11:59 PM ET on **Friday, May 1, 2026.**

[DATE], 2026

SUBMITTED VIA REGULATIONS.GOV

Regulations Division
Office of the General Counsel
Department of Housing and Urban Development
451 Seventh Street SW, Room 10276
Washington, DC 20410-0500

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

To the Regulations Division, Office of General Counsel:

[Insert name of group/Individual] submits this comment in opposition to the U.S. Department of Housing and Urban Development’s (“HUD”) Notice of Proposed Rulemaking, “Establishing Flexibility for Implementation of Work Requirements and Term Limits.” Allowing PHAs and owners of HUD-assisted housing to take away housing assistance from residents who exceed strict time limits or who do not meet rigid work requirements will lead to more people experiencing eviction and, in worst cases, homelessness. [We/I] strongly oppose(s) this proposed rule and urge HUD to withdraw it.

[Insert description of individual (e.g., resident of public housing, individual with a Section 8/Housing Choice Voucher) or organization, including its size and where it is located, what work it does to support HUD-assisted individuals, etc.]

[I/name of group] believe(s) that everyone deserves to live in a safe, accessible, and affordable home. Federal rental assistance programs help more than 10 million people¹ – including families with children, older adults, people with disabilities, full-time caregivers, and workers paid low wages – stay housed. However, because of chronic underfunding, only one in four households that qualify receive any form of rental assistance.²

¹ Center on Budget & Policy Priorities. (2025). United States Federal Rental Assistance Fact Sheet. Retrieved from: <https://www.cbpp.org/sites/default/files/atoms/files/12-10-19housing-factsheet-us.pdf>

² Acosta, S., & Gartland, E. (2025). To Better Meet Record Levels of Need, Keep Families Housed, Congress Must Increase 2025 Funding for Housing Assistance. Center on Budget and Policy Priorities. Retrieved from: <https://www.cbpp.org/research/housing/to-better-meet-record-levels-of-need-keep-families-housed-congress-must-increase>; 91 Fed. Reg. 10016, 10019 (Mar. 2, 2026) (noting that 1 in 4 eligible families access HUD assistance).

[I/name of group] opposes HUD's proposed rule to allow PHAs and project-based rental assistance owners to implement work requirements and time limits because such policies would create more barriers to housing stability for individuals and families. In fact, a two-year time limit on HUD rental assistance would put millions of families at risk of losing their homes.³ While the proposal would not require adoption of these policies, HUD's proposed changes would allow states to mandate time limits and/or work requirements.

The proposed rule is rooted in false, harmful stereotypes that people who receive rental assistance do not work. In fact, most people in HUD-assisted housing who can work, do work.⁴ However, many working people still need rental assistance to help them afford housing because housing costs far exceed wages. [Use our [state factsheets](#) to pull information about your state's housing wage and how housing costs far exceed incomes. You can use NLIHC's [Out of Reach state data](#) for more state-specific information.]

[In your own words, insert examples of how work requirements and/or time limits would impact you or the people you serve, such as the following examples:

- If you are a resident, talk about how long-term federal housing assistance allows you to maintain housing stability, take care of your health and your family, maintain your job, etc.
- If you are a resident working multiple jobs, talk about how many jobs you're working to make ends meet.
- If you are a resident with a child/children talk about the cost of childcare. The combination of low-wage jobs and lack of affordable child care limits employment options for many parents. For context, HUD's proposal does not exempt caretakers for children ages six and older from work requirements; HUD's proposal has no parent/caretaker exemption for time limits.
- If you are a resident with a disability or a caregiver, share your concerns about needing to complete additional administrative requirements to claim your exemption. Share any examples from past experiences.
- If you work with tenants, talk about how challenging it is for your clients to make ends meet, even with working multiple jobs and/or balancing caregiving.
- If you are a tenant or an organization that works with tenants, discuss your concerns about how many people would lose assistance under time limits. Use our [state fact sheets](#)

³ Fisher, W., & Gartland, E. (2025). 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. Retrieved from:

<https://www.cbpp.org/research/housing/rental-assistance-time-limits-would-place-more-than-3-million-people-half-of-them> (estimating that over 3 million people would be at risk of losing rental assistance with a 2-year time limit).

⁴ Mazzara A. & Sard, B. (2018). [Chart Book: Employment and Earnings for Households Receiving Federal Rental Assistance](#). Washington, DC: Center on Budget and Policy Priorities.

to pull state-specific information on how many individuals, households with children, and working households would lose assistance under a two-year time limit.

- If you are a resident who has faced discrimination when trying to find work or to keep your job, talk about how that has affected your ability to afford rent and other necessities. Discuss any barriers you have experienced when trying to get a job or increase your income (e.g., lack of affordable transportation, lack of job opportunities where you live, employment gaps for health or family reasons, lack of internet access, applying for numerous jobs without response).
- If you are a resident, describe any lack of supports in your community for job seekers, such as insufficient job-related services or weak anti-discrimination protections.
- Feel free to include any additional examples or information you'd like HUD to consider.]

These are just a few examples of how time limits and work requirements would harm HUD tenants. HUD should withdraw this proposal in its entirety and instead work with policymakers to ensure that everyone has access to safe, accessible, and affordable housing.

Thank you for the opportunity to comment. Please contact [insert contact name and information] for any questions or further information regarding these comments.

Sincerely,

[name]

[title]

[organization]