

Cash Advocate's Guide to Commenting 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](#), [potential impact for every state](#), [legal analysis](#), and [our compilation of research on work requirements and time limits](#).

This comment template is meant for cash advocates, including but not limited to national and state advocacy organizations, administrators or entities that use Temporary Assistance for Needy Family (TANF) funding or help people access tax credits, guaranteed income or universal basic income providers, and tenants who personally understand how housing instability constrains their families' budget.

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, please contact Jesse Fairbanks at jfairbanks@clasp.org

[Organization letterhead]

[Date], 2026

Re: Establishing Flexibility for Implementation of Work Requirements and Term Limits

Docket No. FR-6520-P-01, RIN 2501-AE15

Submitted via www.regulations.gov

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], many of whom receive or are eligible for federal housing assistance. This work provides us with unique insight into how work requirements and time limits will impact people in [LOCATION]. [IF YOU ARE COMMENTING ONLY ON A PARTICULAR SECTION, STATE THAT HERE].

We are in strong opposition to the proposed rule, *Establishing Flexibility for Implementation of Work Requirements and Term Limits*, 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 direct cash programs like Temporary Assistance for Need Families (TANF), we are confident these policies will not increase employment or self-sufficiency. Instead, these policies will cause increased hunger, housing instability, and homelessness.

[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. Without housing stability, families impacted by work requirements or time limits will struggle to have enough resources to meet their basic needs.

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,

[Name, Title, Organization, Contact Information]

ARGUMENTS TO CUSTOMIZE IN YOUR ORIGINAL COMMENT

1. Housing is the largest expense in most families' budgets, and increasingly unaffordable.

Steady, low-wage work does not cover the cost of housing. The primary reason that households continue to receive housing subsidies for extended periods is that housing costs too much for even full-time workers in jobs that pay low wages to afford. [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.¹]

Housing is the largest part of many households' budget, and the least flexible one. When housing costs consume a disproportionate share of household income, every other part of the budget suffers. In 2020, low-income households that paid 70 percent or more of their total income toward rent spent 38 percent less on food and 70 percent less on health care than similar households renting housing they could afford.²

[Add your own information about the inadequacy of low-wage work and cash assistance in allowing people to afford housing, and the consequences for people's budget tradeoffs.]

2. Losing housing assistance will destabilize families and children.

This NPRM 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.³⁴ The evidence from TANF is clear that more stringent sanctions do not increase employment but reduce program participation among eligible households.⁵ Loss of benefits without income gains from employment pushes families into deep poverty and hardship.⁶

[Add information you may have about the harms of full-family sanctions and its impact on children.]

Eviction disrupts every aspect of a family's life at once — employment, children's schooling, health care, and food security. Research consistently links eviction to worse health outcomes⁷ and lasting harm to children's academic achievement and earnings in adulthood.⁸

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 years long in most jurisdictions."] A family that loses assistance due to a temporary disruption in work hours—an illness, a shift cut, a caregiving emergency—faces years of consequences, not months.

3. The evidence from TANF shows work requirements and time limits don't promote employment but do act as barriers to participation.

The thirty-year history of TANF, the main federal cash assistance program for families with children, confirms that work requirements and time limits are ineffective policies. Work requirements and time limits can modestly increase employment under favorable economic conditions, but they do not reliably improve family incomes — and they function primarily as barriers that keep eligible families from accessing benefits.⁹

Cash assistance caseloads have fallen from 4.4 million families in 1996 to under one million today, but this is not because families no longer need help: rigorous research finds that only about one-fifth of the decline can be attributed to improved economic circumstances among low-income families.¹⁰ The rest reflects policy-imposed barriers—work reporting requirements, time limits, sanctions, and administrative burdens—that prevent eligible families from receiving assistance that they qualify for. The Great Recession made this failure concrete: SNAP caseloads roughly doubled as unemployment rose, while TANF caseloads grew just 16 percent nationwide.¹¹

The families cut off by these barriers pay a real price. Research using state-level variation in TANF caseloads found that declining cash assistance coverage between 2001 and 2015 was directly associated with increases in household food insecurity and homeless children in public schools, with the strongest effects among single mothers living alone with their children.¹² Meanwhile, claims that work requirements are needed to push single mothers into employment are not supported by the data: less-educated single mothers are now employed at *higher* rates than married mothers with equivalent education.¹³

[If you have state or local specific information about the failure of work requirements and time limits in TANF or other programs, include it here. You may also want to include information about how specific populations that you are concerned about will be impacted.]

Families that are unemployed face real barriers, including disability, caregiving responsibilities, and lack of jobs that pay enough to be worth the cost of childcare, and they are unlikely to receive support from cash assistance programs because of underfunding and stringent requirements. Removing their housing as well removes the last stable foundation from which to address those barriers.

4. The exemptions for certain populations are inadequate and won't prevent them from losing assistance.

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.

Evidence from TANF confirms that, despite official exemptions, individuals with disabilities are often not exempted and are more likely to lose benefits.

Clients with physical and mental health issues may not understand what is required of them, or may find it difficult to complete paperwork or travel to appointments to be assessed for exemptions. People with disabilities that are not clearly visible or that do not have specified biomarkers, such as long COVID or many mental health disabilities are particularly at risk of being denied exemptions. Ironically, the same issues that limit people's ability to work without accommodations can also make it harder to complete the bureaucratic requirements needed to obtain an exemption.¹⁴

[If you have additional information about the consequences of implementing work reporting requirements on exempted populations, or groups that are particularly likely to be at risk of being sanctioned for reaching time limits, add it here.]

5. No funding is provided for meaningful supportive services

Providers succeed at increasing self-sufficiency among recipients when they offer meaningful supportive services. The Charlotte program cited in HUD's NPRM combined a work requirement with intensive, directly provided supportive services including life coaches, case management, and workforce development partnerships—none of which are funded under this NPRM. Participating agencies are required to provide supportive services, but a simple referral to the local career center would be sufficient to meet this requirement. The NPRM 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 child care, lack of transportation, how little job training is provided by WIOA agencies in your area, how programs are already struggling to offer services to people impacted by expanded SNAP time limits.].

[If you have information about the services provided by another high quality program, and the costs of providing those services, add them here.]

The rule provides no meaningful monitoring or enforcement of the supportive services requirement; HUD states only that it will "work with agencies" if it becomes aware of deficiencies — while families continue to lose housing.¹⁵ [If you have information about how flexibility in the state TANF program has led to poor policymaking decisions, add them here.]

Referring people to already underfunded and overwhelmed service providers is not providing services. [Add information you may have about waiting lists for child care, lack of transportation, or how little job training is provided by TANF or WIOA agencies in your area.]

6. Working families will lose housing because of this rule.

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.¹⁶ 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.”¹⁷]

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.^{18 19} The NPRM allows work requirements of up to 40 hours per week, a threshold 10 hours greater than the typical TANF requirements. This requirement would expose seasonal workers, on-call workers, and those whose employers deliberately limit hours to constant risk of losing their housing. Workers would also be at high risk of losing benefits during an economic downturn when jobs are unavailable.

[If you have information about how people subject to TANF or other work requirements have struggled to have consistent hours of work, share it here.

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.]

¹ Out of Reach. National Low Income Housing Coalition. <https://nlihc.org/oor>

² *America’s Rental Housing 2022*. Joint Center for Housing Studies of Harvard University, 2022. https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_Americas_Rental_Housing_2022.pdf.

³ Department of Housing and Urban Development, “NPRM on Establishing Flexibility for Implementation of Work Requirements and Term Limits,” 91 FR 10016, March 2, 2026. (NPRM) <https://www.federalregister.gov/d/2026-04095/p-55>

⁴ Arkansas HB 1196 of 2023.

<https://arkleg.state.ar.us/Home/FTPDocument?path=%2FBills%2F2023R%2FPublic%2FHB1196.pdf>

⁵ Julia Shu-Huah Wang, “State TANF Time Limit and Work Sanction Stringencies and Long-Term Trajectories of Welfare Use, Labor Supply, and Income,” *Journal of Family and Economic Issues*, October 14, 2020, <https://link.springer.com/article/10.1007/s10834-020-09714-8>.

⁶ H. Luke Shaefer, Kathryn Edin, Vincent Fusaro, and Pinghui Wu, “The Decline of Cash Assistance and the Well-Being of Poor Households with Children,” *Social Forces* 98(3):1000–1025, 2019. <https://doi.org/10.1093/sf/soz020>

⁷ Gracie Himmelstein and Matthew Desmond. *Eviction And Health: A Vicious Cycle Exacerbated By A Pandemic*. Health Affairs, 2021. <https://www.healthaffairs.org/doi/10.1377/hpb20210315.747908/full/>.

⁸ Robert Collinson et al, “The Effects of Eviction on Children.” Working Paper No. 33659. National Bureau of Economic Research, April 2025. <https://doi.org/10.3386/w33659>

⁹ Gayle Hamilton, Stephen Freedman, Lisa A. Gennetian, Charles Michalopoulos, and Anna Adams-Ciardullo. “National Evaluation of Welfare-to-Work Strategies: How Effective Are Different Welfare-to-Work

Approaches?” MDRC, December 2001. <https://www.mdrc.org/work/publications/how-effective-are-different-welfare-work-approaches>

¹⁰ Elizabeth Lower-Basch and Ashley Burnside. “TANF 101: Cash Assistance.” CLASP, July 2022.

<https://www.clasp.org/publications/report/brief/tanf-101-cash-assistance/>. Zachary Parolin, “Decomposing the Decline of Cash Assistance in the United States, 1993 to 2016,” *Demography*, vol. 58, no. 3 (April 21, 2021), pp. 1119-1141. <https://doi.org/10.1215/00703370-9157471>

¹¹ Randi Hall, *TANF in the Great Recession*. TANF 101. CLASP, 2015.

<https://www.clasp.org/sites/default/files/public/resources-and-publications/publication-1/TANF-101-TANF-in-the-Great-Recession.pdf>.

¹² H. Luke Shaefer, Kathryn Edin, Vincent Fusaro, and Pinghui Wu, “The Decline of Cash Assistance and the Well-Being of Poor Households with Children,” *Social Forces* 98(3):1000–1025, 2019.

<https://doi.org/10.1093/sf/soz020>

¹³ Original analysis of CPS ASEC data for single vs. married mothers ages 18-54 with a child in the household with a high school degree or less. IPUMS CPS, University of Minnesota, <http://www.ipums.org>

¹⁴ Ashley Burnside, Elizabeth Lower-Basch, Teon Dolby, Parker Gilkesson, and Lisa McCorkell. “Advancing Disability Equity and Access in TANF and SNAP for People with Long COVID.” CLASP, October 13, 2022. <https://www.clasp.org/publications/report/brief/advancing-disability-equity-and-access-in-tanf-and-snap-for-people-with-long-covid/>.

¹⁵ NPRM, <https://www.federalregister.gov/d/2026-04095/p-135>

¹⁶ Out of Reach. National Low Income Housing Coalition. <https://nlihc.org/oor>

¹⁷ 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. <https://www.cbpp.org/research/housing/rental-assistance-time-limits-would-place-more-than-3-million-people-half-of-them>

¹⁸ Lauren Bauer, Chloe East, and Olivia Howard. *Low-Income Workers Experience—by Far—the Most Earnings and Work Hours Instability*. 2025. <https://www.brookings.edu/articles/low-income-workers-experience-by-far-the-most-earnings-and-work-hours-instability/>

¹⁹ 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. https://www.urban.org/sites/default/files/publication/100352/precarius_work_schedules_could jeopardize_access_to_safety_net_programs_1.pdf