

Nutrition 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 food security and nutrition advocates, including but not limited to national and state advocacy organizations, direct service providers such as pantries or soup kitchens, and tenants who personally understand the consequences of housing instability on food security.

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 our experience with work requirements in food assistance programs, 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, households impacted by work requirements or time limits will struggle to feed their families.

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. Losing housing assistance is destabilizing and will increase food insecurity.

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.¹² This penalty is far more severe than the corresponding sanction under SNAP, where other family members can continue to receive benefits if one individual within the household loses benefits due to the three-month time limit or other eligibility restriction.

Rental assistance is strongly related to food security. Housing is the largest part of many households' budget, and one of the least flexible ones. When housing costs consume a disproportionate share of household income, every other part of the budget suffers. In 2020, low-income households in "severely rent burdened households" spent 38 percent less on food than similar households renting housing they could afford.³ Receipt of housing assistance has been found to significantly decrease food insecurity and improve the quality of residents' diets.⁴

[If you have additional information about how housing costs are driving factor in hunger, add it here.]

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. 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.

[If you have additional information about how challenging it is for families experiencing housing insecurity to feed themselves, add it here.]

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

SNAP's three-month time limit has been extensively studied, and the research is overwhelmingly consistent in finding negative effects on participation among eligible people, and little or no effects on employment.⁵ In SNAP, adults considered to be able-bodied without depends (ABAWDs) are subject to an additional provision that generally limits them to receiving SNAP for no more than 3 months in a 36-month period unless they are working or participating in a work-related activity for at least 20 hours per week. People who lose benefits

due to this restriction may not regain eligibility until they have worked for 30 days—or if they are in training 20 hours per week to maintain eligibility.

One of the most rigorous studies on SNAP time limits, using administrative data to compare people just above and just below the upper age limit to which the time limit applied, found that these requirements reduced participation in SNAP by about 50 percent among those subject to the policy.⁶ A USDA study examined nine states at the point when the time limits were reinstated after being suspended during the Great Recession. The researchers found SNAP participation dropped by more than 50 percent within a year in six of them. In all three states where employment was tracked, the time limit produced no improvement in employment; in fact, the primary analysis found significant *negative* employment impacts in all three states.⁷ The net effect of the time limit in these states was to substantially reduce the total annual resources—SNAP benefits plus earnings—available to individuals, by between \$617 and \$1,432 per person.⁸

[If you have state or local specific information about the failure of work requirements and time limits in SNAP 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.]

3. 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.

[If you are particularly concerned that this rule will lead to a specific exempted population losing assistance, explain that perspective here.]

The HUD NPRM would require PHAs and owners to exempt even fewer populations than is allowed under SNAP's work requirements. Work requirements could be imposed upon parents of elementary school age children, and families with children of any age could be subject to the time limits. The required disability exemptions are limited to people who meet SSI's stringent definition of permanent and complete disability, or other similarly narrow definitions.

The evidence from SNAP confirms that, despite official exemptions, individuals with disabilities are often not exempted and are more likely to lose benefits. For example, an Ohio study found that one-third of the people referred to a SNAP employment program that would allow them to keep their benefits in spite of the time limit reported a physical or mental limitation.⁹ Studies consistently find that clients with physical and mental health conditions are disproportionately likely to be sanctioned for failing to meet work requirements; the same

conditions that limit their ability to work also make it harder to navigate paperwork, attend appointments, and obtain documentation.

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.¹⁰

[If you have additional information about state or local experience in imposing work requirements, or groups that are particularly likely to be at risk of being sanctioned or reaching time limits, add it here.]

4. 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.].

Without dedicated funding for supportive services, housing providers that adopt work requirements will struggle to provide meaningful supportive services. In SNAP, adults considered to be able-bodied without depends (ABAWDs) are subject to work reporting requirements. Congress established the SNAP Employment & Training (SNAP E&T) program in 1985 with dedicated funding to assist members of households participating in SNAP in gaining skills, training, or experience that will increase their ability to obtain regular employment. In recent years, SNAP E&T has become a significant funding stream for voluntary employment and training services for people enrolled in SNAP, as well as for a wide variety of wrap-around supportive services. Such supports include child care and transportation that make it possible for people enrolled in SNAP to access higher-paying careers and industries that would otherwise be inaccessible.¹¹

[If you have information about the services provided by another high quality program, such as a voluntary SNAP E&T program in your state, and the costs of providing those services, add them here.]

5. 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.¹² 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.”¹³]

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.¹⁴ ¹⁵The NPRM allows work requirements of up to 40 hours per week, a threshold twice as high as the SNAP requirement, which has already caused extensive harm. 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 the SNAP time limit 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.]

6. Differing requirements across basic needs programs will confuse families.

People who receive help with housing costs often rely on other programs to help them meet their basic needs. Households participating in both rental assistance programs SNAP may lose their benefits because the reporting requirements differ by program. The work requirements and time limits in housing have different hours standards, countable activities, exemption standards and reporting requirements than the SNAP requirements. This inconsistency across programs will multiply the confusion and administrative burden of each requirement. People may lose benefits because they complied with the requirements of one program and assumed that the information would be shared with the other.

¹ 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>

² Arkansas HB 1196 of 2023.

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

³ *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.

⁴ Whitney Denary et al. "Rental Assistance Improves Food Security and Nutrition: An Analysis of National Survey Data." *Preventive Medicine* 169 (April 2023): 107453. <https://doi.org/10.1016/j.ypmed.2023.107453>.

⁵ Lauren Bauer and Chloe N. East. "A Primer on SNAP Work Requirements." Brookings, October 2023.

<https://www.brookings.edu/articles/a-primer-on-snap-work-requirements/>.

⁶ Colin Gray, Adam Leive, Elena Prager, Kelsey Pukelis, and Mary Zaki. "Employed in a SNAP? The Impact of Work Requirements on Program Participation and Labor Supply." *American Economic Journal: Economic Policy* 15, no. 1 (February 2023): 306–41. <https://doi.org/10.1257/pol.20200561>.

⁷ Laura Wheaton, Tracy Vericker, Jonathan Schwabish, et al. *The Impact of SNAP Able Bodied Adults Without Dependents (ABAWD) Time Limit Reinstatement in Nine States*. Urban Institute, 2021.

<https://www.urban.org/research/publication/impact-snap-able-bodied-adults-without-dependents-abawd-time-limit-reinstatement-nine-states>.

⁸ Wheaton et al.

⁹ Ohio Association of Foodbanks, Comprehensive Report: Able-Bodied Adults Without Dependents, 2015, [HHRG-116-AG03-Wstate-Hamler-FugittL-20190403-SD001.pdf](https://www.ohiofoodbanks.org/wp-content/uploads/2015/04/HHRG-116-AG03-Wstate-Hamler-FugittL-20190403-SD001.pdf)

¹⁰ 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/>.

¹¹ Teon Hayes and Elizabeth Lower-Basch. Strategies to Improve the Effectiveness of SNAP's Employment and Training Program, 2023, <https://www.clasp.org/wp-content/uploads/2023/08/SNAP-ET.pdf>

¹² Out of Reach. National Low Income Housing Coalition. <https://nlihc.org/oor>

¹³ 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>

¹⁴ 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/>

¹⁵ 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