

STOP WORK REQUIREMENTS AND TIME LIMITS FROM DAMAGING RENTAL ASSISTANCE PROGRAMS IN YOUR COMMUNITY

ADVOCACY TOOLKIT | NOVEMBER 2026

Some communities are making plans to implement policies that will take housing away from people who can't meet harsh requirements immediately after the Trump Administration publishes a final rule. This toolkit is meant to help you educate decisionmakers in your community about these dangerous policies and build the political power to stop them so that people don't lose their homes.

CLASP The Center for Law and Social Policy
LDF Legal Defense Fund
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WHAT POLICY CHANGE DOES THE RULE PROPOSE?

The Department of Housing and Urban Development (HUD) recently proposed a new policy that will impact 10 million people who receive federal rental assistance. The policy change would allow local Public Housing Authorities (PHAs) and federally assisted landlords to:

- Require "work-eligible" adults to engage in work activities for up to 40 hours per week as a condition of receiving federal rental assistance; and/or
- Establish time limits as short as two years for non-elderly, non-disabled families.

Even with exemptions for some older adults, people with disabilities, and caregivers, these policy changes will affect populations who can't work because they add more documentation requirements for everyone.

WHAT IS THE THREAT TO RENTERS?

If a PHA or landlord adopts these policies, tenants will face new burdens and may even lose their housing. Tenants subject to work requirements would have to spend time filling out paperwork to document how many hours they work each month, while tenants who are exempt because of caregiving responsibilities or disabilities would have to prove that they should be excused. More requirements mean more chances for something to be missed. Past experience tells us that these policies will force families with low incomes off of federal rental assistance programs, pushing many into homelessness, *without* increasing employment or wages.

> **An estimated 3.7 million households could lose their housing, including 2.1 million working households and 1.9 million children.**
>
> *Source: Center on Budget and Policy Priorities*

WHEN MIGHT THIS POLICY CHANGE COME TO YOUR COMMUNITY?

This policy change is not in effect yet. It's also not mandatory, meaning PHAs and landlords will not be required to implement work requirements and time limits.

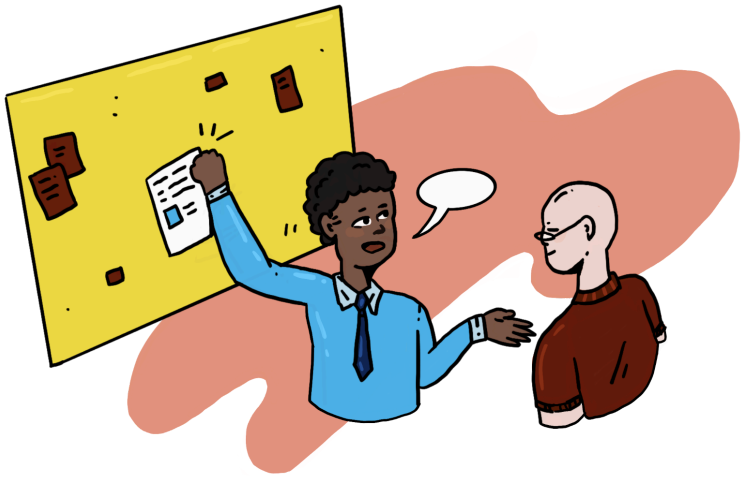
> **PHAs and local landlords can't begin implementing work reporting requirements or time limits until the Trump Administration publishes a final rule, but some communities are already making plans to move forward with these harmful policies.**

Jacksonville, Florida, for example, published a **draft work requirement policy** to go into effect as soon as the final rule is published. HUD estimates that approximately 750 PHAs and 3,504 local landlords will adopt work requirements or time limit policies. Although the policy change is not mandatory, state and local governments can pass laws that would force local PHAs in their jurisdiction to adopt work requirements and time limits.

HOW CAN I PREVENT MY COMMUNITY FROM EXPANDING WORK REQUIREMENTS OR TIME LIMITS IN RENTAL ASSISTANCE PROGRAMS?

1

EDUCATE YOUR NEIGHBORS



A **Share information about HUD's plans with your neighbors.**

B **If your community has a resident association or tenant organization, attend their meetings to discuss HUD's plans.**

C **If your community does not have a resident association or tenant organization, consider forming one to build power.** If you are a renter in public housing, **this toolkit** discusses how to organize a resident council. If you reside in other HUD housing, resources on organizing are available from the **Leaders and Organizers for Tenant Empowerment Network** and the **Tenant Union Federation**.

D **Get in touch with a reporter at your local newspaper or publish an op-ed.** Sharing your opinion about these policy changes with the media could put pressure on your PHA to reject work requirement or time limit policies.

2

CONTACT YOUR LOCAL PHA



A **Contact the head of your PHA to ask whether they plan to create any work requirements or time limits.** PHAs administer public housing and housing choice voucher programs. Several PHAs have already signed up for HUD's so-called **Work & Dignity Coalition**, demonstrating their interest in these policy changes. If you do not know how to contact the head of your PHA, you can look up their contact information **here**.

If you live in a project-based rental assistance property, you'll want to talk to your landlord instead!

B **Contact your PHA's Board of Commissioners and attend their meetings to educate them about work requirements or time limits.** A PHA's board votes and decides on your PHA's policies. You can contact individual members of the board to educate them about work requirements or time limits, and can also attend board meetings to talk about and comment on any PHA's plans to create work requirement or time limit policies.

C **Participate in your local PHA's planning processes.** PHAs must submit plans that lay out the local rules for their programs. Larger PHAs undergo these planning processes annually, and all PHAs do every five years. To adopt either work requirements or time limits, your PHA would need to amend their annual or five-year plans. The PHA planning process requires public notice and comment, which creates a great opportunity for residents and advocates to get involved and oppose harmful policy changes.

3

CONTACT YOUR ELECTED OFFICIALS



A **Contact the head of your local government.** They could put pressure on PHAs or landlords who want to create work requirement or time limit policies, or even champion local legislation to prevent a PHA in their jurisdiction from implementing either policy change. If you do not know who the head of your local government is, you can find out **here**.

B **Contact your state's elected officials.** They could pass a state law to prohibit work requirements or time limit policies **like California**. If you do not know who your state's elected officials are, you can find out **here**.

C **Contact your members of Congress.** Congress could pass a law to stop HUD from allowing work requirements or time limits. If you do not know who your Senators or Congresspeople are, you can find out **here**.

WHAT ARGUMENTS CAN I USE IN CONVERSATIONS WITH POLICYMAKERS?

Stopping work requirements and time limits from being implemented in your community will require some tough conversations. Some people don't see anything inherently wrong with "work requirements" or time limits because of **false stereotypes** about people who use basic needs programs. These talking points should help you communicate to diverse audiences about why policies that take housing away from people who can't meet harsh requirements will hurt everyone in your community.

1 The issue for most renters is not whether they're working, it's whether their jobs pay enough or give them enough hours to cover increasingly out-of-reach housing costs. Families working full time and making the federal minimum wage still qualify for rental assistance. Across America, the **average family's wages are not enough** to afford a two-bedroom apartment at market rates. Work requirements and time limits do nothing to address this gap. In fact, under a time limit, working people are likely to lose their homes.

2 Work requirements and time limits are costly to implement, and the federal government isn't planning to send your local housing providers more money to enact either of these changes. Your community will need to pay for new forms, staff, technology, and more. Not only are these policies expensive for your community, but **they don't work**! Research shows that work requirements and time limits **do not** increase employment rates or improve earnings but **do** take assistance away from people who need it.

3 Despite exclusions, work requirements and time limits endanger vulnerable populations who cannot work, like people with disabilities, older adults, and their caregivers because each of them must prove their eligibility for an exemption. Every additional piece of paperwork required during an application or recertification period increases the likelihood that households make a mistake and lose their housing.

WHAT ARGUMENTS CAN I USE IN CONVERSATIONS WITH POLICYMAKERS?

4 Implementing harsh work requirement and time limit policies for adults puts children most at risk of losing housing. Nearly **90 percent** of families with children receiving rental assistance also include an adult who is considered "work-able." Among them, about 38 percent, or 631,000 families, didn't have wage income in 2024, likely because they had caregiving responsibilities that made it challenging for them to find an accommodating employer. The combination of low-wage jobs and lack of affordable child care limits work options for many parents of young children.

5 HUD subsidies help the rental market in your local community thrive. The federal government makes it possible for millions of Americans to pay their rent every month by providing rental assistance. With the potential for error, reporting burdens, and inconsistency that time limits and work requirements will inject into the voucher program, this rule could do real damage to landlord participation and, in turn, the community's local housing market. If landlords feel unable to rely on federal subsidies each month, they might not participate in the program.

6 There are more effective policy options available to help renters become financially secure! Programs like the Family Self-Sufficiency Program and other supportive services are already funded by the federal government and have proven to help families earn more, save more, and move toward better opportunities.

7 Most households that currently need help affording rent cannot access rental assistance at all due to Congress's choice to severely underfund rental assistance programs. Only a quarter of income-eligible households receive help from the federal government to afford housing. Work requirements and time limits do nothing to address this funding shortage. In fact, these policies just take housing away from people. We should work to expand rental assistance until it is available to all who need it, not advance strategies that put more families at risk of homelessness.

Check out this resource for additional talking points →

ACKNOWLEDGEMENTS

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If you have any questions or curiosities about this resource or want a collaborator to help you push back against work requirements and time limits, please email Jesse Fairbanks at **jfairbanks@clasp.org**. They will make sure you are directed to the right person.

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