

April 15, 2026

Regulations Division  
Office of Policy Development and Research  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street, SW  
Room 10276  
Washington, DC 20410-0500

**RE: Public Comment on *FR-6520-P-01 Establishing Flexibility for Implementation of Work Requirements and Term Limits* proposed rule**

I write to you on behalf of the National Alliance to End Homelessness (herein referred to as the Alliance) in response to *FR-6520-P-01 Establishing Flexibility for Implementation of Work Requirements and Term Limits* proposed rule. The Alliance is a nonpartisan, nonprofit organization whose mission is to prevent and end homelessness in America.

According to data published by the U.S. Department of Housing and Urban Development (HUD), more than 771,000 people experienced homelessness on a single day in January 2024. Approximately **17,500 people** became homeless for the first time *each week* as a result of a [dire affordable housing crisis](#) and an insufficient social safety net. Homelessness response systems across the country do not have the resources needed to keep up with this demand while also working to quickly rehouse those who are already experiencing homelessness.

The Alliance strongly opposes HUD's proposal to grant authority to Public Housing Agencies (PHAs) to implement work requirements and time limits on federally-funded housing placements. This rule would result in greater housing instability for more than 3 million people, placing them at greater risk of homelessness.

**The Imposition of Work Requirements: Negative Impacts**

HUD's rule proposal would allow housing providers to implement work requirements on able-bodied adults under the age of 62, barring an allowable exemption. Past efforts to implement these types of rules failed and were abandoned for several reasons:

- **Administrative costs were higher, and didn't provide better outcomes.** Any potential savings would shift costs elsewhere, which could potentially be more expensive down the road. Service providers with limited resources – operating in a workforce already stretched too thin – would have to hire or repurpose staff to ensure compliance. These dollars could instead be used to provide better services for their clients. In these past efforts to implement work requirements, nearly all housing terminations were due to missing bureaucratic paperwork requirements, not from failure to look for work.

- **Taking away benefits from parents directly hurts their children.** While children can receive their own benefits, no child's situation is better when their parents are undergoing extreme hardships. Ultimately, if the parent(s) fall into homelessness, their children have an increased likelihood of going into foster care, increasing their trauma and potentially leading to their own homelessness in adulthood.
- **Rural Americans face additional barriers to gaining employment.** Many rural communities lack access to broadband or quality job training. Rural communities often have limited transportation options, sparse job opportunities, and little economic diversity. Additional reporting requirements while dealing with these factors could lead to an unnecessary loss of benefits and an increased risk of becoming homeless.
- **Communities of color were disproportionately impacted by work requirements than their white counterparts.** Communities of color continue to face systematically higher unemployment rates, fewer job opportunities, lower pay, poorer benefits, and greater job instability. Efforts to correct this should be focused on ensuring extremely low-income individuals of color have the same access to education, jobs, and transportation that people in high opportunity communities have. And as work requirements of the Supplemental Nutrition Assistance Program (SNAP) have shown, black recipients of housing assistance are at higher risk of housing displacement than white recipients.
- **Work requirements do nothing to lower the cost of housing.** Between 2019 and 2023, rental rates rose 30.4%, and continued increases will drive up the rates of homelessness. HUD would be better served working with Congress upon increasing the affordable housing supply and providing more rental subsidies for individuals in need of housing.
- **People over the age of 50 may experience additional hardship should this rule be implemented.** These individuals may have health conditions or experience age discrimination that could prevent them from gaining meaningful employment. Since older adults are the fastest growing population experiencing homelessness – 20% of all people experiencing homelessness are over the age of 55 – putting additional barriers in place would increase their housing instability.

## The Harm of Time Limits

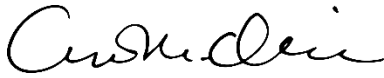
HUD's proposed rule would allow housing providers to impose time limits on housing assistance of no more than two years. Such a requirement would only result in greater housing instability and more households becoming homeless.

- If time limits were currently applied to work-able households, it would cause approximately 1,129,800 Section 8 households and 265,700 public housing units to lose their subsidy.
- Time limits are impractical in a time where there is a shortage of 7.2 million rental homes affordable and available to extremely low-income households. Forcing people out of stable housing into an unaffordable market will dramatically increase their risk of homelessness. This problem would be magnified in cities and states that have a higher cost of living.
- Of the nineteen Moving to Work agencies that have attempted to impose time limits, eleven rescinded the policy after finding that it only resulted in 6% of their participants able to afford market rate rent on their own. HUD would be better served investing in supportive services, job training, and childcare to help participants reach this goal.

As the nation continues to face a severe shortage of affordable housing and grapple with an insufficient safety net, HUD should be supporting policies that increase the affordability of and access to safe and stable housing. We hope the Administration will reconsider this harmful proposal that will only make the crisis worse.

If you have any questions about our comment, please contact Marcy Thompson, Vice President for Programs and Policy, [mthompson@naeh.org](mailto:mthompson@naeh.org), 202-942-8246.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann M. Oliva". The signature is fluid and cursive, with a large initial "A" and "O".

Ann M. Oliva  
Chief Executive Officer  
National Alliance to End Homelessness