



Public Comment to the Department of Housing and Urban Development on Implementation of Work Requirements and Term Limits

Jane Leer, San Diego State University

Thank you for the opportunity to comment on FR-6520-P-01. I am an expert on the impacts of housing and housing policy on child and family wellbeing and a psychology professor at San Diego State University. I write to strongly oppose the Proposed Rule Establishing Flexibility for the Implementation of Work Requirements and Term Limits for Public Housing Agencies (PHAs) and Multifamily Housing Owners (Owners).

The proposed rule involves two significant changes to the administration of Federal housing assistance programs. First, this rule would enable PHAs and Owners to require work-eligible adults to work up to 40 hours/week to receive housing assistance. Second, PHAs and Owners could instate 2-year term limits for non-elderly, non-disabled families receiving housing assistance via public housing, the Housing Choice Voucher (HCV) Program, the Project-Based Voucher (PBV) Program, and the Project-Based Rental Assistance (PBRA) Program. These changes are described as “necessary to meet the statutory aims of promoting self-sufficiency for residents and addressing the affordable housing shortage,” but work requirements and time limits risk jeopardizing access to stable, affordable, and sanitary housing for over 3.7 million Americans who rely on federal housing assistance (Gartland, 2026). The proposed changes would increase housing insecurity and homelessness, and exacerbate, not mitigate the affordable housing shortage. The result would be a substantial cost to society given robust evidence showing negative effects of housing loss on health outcomes, educational attainment, employment, and income (Collinson et al., 2022; Hatch & Yun, 2021; Hepburn et al., 2025; Ramphal et al., 2023).

Here’s why:

1. Evidence consistently shows that work requirements in public welfare programs generally do not increase self-sufficiency (Bauer & East, 2026; Wagner & Schubel, 2020). The proposal cites an evaluation of the Charlotte, North Carolina Housing Authority’s Moving to Work Program as evidence that work requirements successfully led to increased income among public housing residents (Rohe et al., 2016). However, it is important to emphasize that the Charlotte Housing Authority set a maximum of 15 hours/week for the work requirement, not 40 hours/week, as proposed in FR06520-P-01. Further, the rule states that people with disabilities (along with other criteria) would be exempt from work requirements, however most PHAs and Owners do not have the capacity to reliably execute the extensive documentation required to demonstrate exemption eligibility (Wagner & Schubel, 2020). This means that many people who meet exemption criteria through disability or other factors would likely lose assistance.

2. Work requirements will likely drive out many low-wage workers who cannot access affordable afterschool programs for their children. The Proposed Rule includes a provision to exclude primary caregivers of children

under 6-years old from work requirements, but caregiving does not stop at age 6. The Proposal also includes a requirement that PHAs, Owners, or associated partners provide supportive services, including “childcare that provides sufficient hours of operation and serves an appropriate range of ages.” If the goal is increasing self-sufficiency, affordable childcare should be a required component of support services, not optional.

3. Work requirements do not account for the volatile nature of low-wage work. Low-wage workers face inconsistent hours that are largely determined by their employers, not the workers themselves (Ananat et al., 2025). Many low-wage workers want to work 40 hours/week but cannot through no fault of their own.

4. Time limits would push many families into homelessness and housing security. The Proposed Rule describes the current HUD policy as “characterized by prolonged periods of assistance and dependence on HUD’s rental assistance,” noting that over the last ten years, the percentage of recipients who spend more than 10 years in subsidized housing increased by over 50%. However, during this same timeframe, the gap between average incomes and rental costs grew dramatically. From 2001 to 2024, renter incomes rose by 9% in real terms, while rents rose by at least 30% (Joint Center for Housing Studies, 2026b). Rental cost burden is common even among middle-income households (i.e., those earning between \$45,000 to \$75,000 annually). Nationally, half of middle-income households spend more than 30% of their income on rent (Joint Center for Housing Studies, 2026a). Thus, the problem is not that people want to remain in subsidized housing forever. Rather, the gap between subsidized versus market-rate rents has become so large that market-rate housing is unattainable for most. Further, during the same period, Federal funding for housing assistance programs has only increased modestly, not enough to keep pace with rising rents. This is why waitlists for housing vouchers and public housing are so long.

5. Evidence shows that long-term access to rental subsidies is an effective way to reduce homelessness and promote child and family wellbeing. The Proposed Rule cites a 2016 evaluation of the Family Options Study, which randomly assigned families experiencing homelessness to long-term rental subsidies, short-term rental subsidies, or usual care. The study is cited as evidence that subsidies had a negative effect on employment (Gubits et al., 2016). However, it is critical to note that the long-term follow-up found there were no differences in income between groups receiving subsidies versus usual care (Gubits et al., 2018). Moreover, long-term rental subsidies were the only intervention that reduced homelessness, while also providing substantial benefits across numerous domains of family wellbeing including reduced experiences of intimate partner violence, greater likelihood of being food secure, better mental health and reduced alcohol dependence among parents, and fewer school absences and reduced behavioral problems among children (Gubits et al., 2018).

6. Finally, a 2-year time limit would put many households at risk of losing their voucher as soon as they are effectively “leased up.” Median rental search times among voucher recipients range from 59 to 63 days, up to 180 days is not uncommon (Ellen et al., 2024). A 2-year limit would force many families to leave their subsidized housing only months after settling in. Moreover, only around 60% of HCV recipients successfully use their voucher to lease a home, largely due to challenges finding landlords who will rent to voucher holders. Landlords may be even less interested in leasing to voucher recipients if time limits are in place due to increased turnover and vacancy risk. For these reasons I urge the administration NOT to go through with FR-6520-P-01. The stakes are high. The proposed rule would put at least 3.7 million people, nearly half of whom are children, at risk of losing rental assistance (Gartland, 2026). Many of these families would likely be pushed into homelessness. If the Administration does follow through with this proposal, work requirements should be much lower than 40 hours /week, PHAs and Owners should be required to provide affordable

childcare for affected families, and the time limit should be substantially longer than 2 years.