

NLIHC's HoUsed Campaign for Long-Term Housing Solutions

April 14, 2026

Welcome & Updates



David Gonzalez Rice

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Agenda



Welcome & Introductions

- David Gonzalez Rice, Senior Vice President of Policy

Trump Administration's FY27 HUD Budget Request

- Kim Johnson, Senior Policy Director

NPRM: Work Requirements & Time Limits in HUD Assisted Housing

- Renee Williams, Senior Policy Advisor
- Janelle Scott, Director of Policy and Legislative Affairs, CLPHA
- Korey Lundin, Senior Attorney, NHLP
- Michael Nagel, Policy Manager, The Arc
- Jesse Fairbanks, Policy Analyst for Public Benefits Justice, CLASP

Take Action

- Ramina Davidson, Vice President of Field Strategy & Innovation

Trump Administration's FY27 HUD Budget Request



Kim Johnson

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Trump Administration's FY27 HUD Budget Request



Background

The president's budget request is a regular part of the process to fund the federal government

- The budget request is a normal part of the federal appropriations cycle
- The budget request is a ***request***, and does not impact how Congress decides to appropriate funding
- Each administration uses the budget request to message their preferences and priorities for the coming fiscal year
- Only Congress has the power to decide how to spend federal money
 - Ex: FY26 budget request vs. final FY26 spending bill

Trump Administration's FY27 HUD Budget Request



Overview

FY27 Budget Request: \$73.5 billion for HUD; \$3.8 billion cut from FY26 enacted funding, plus an overall 10% decrease to non-defense programs

The FY27 request proposes:

- Work requirements, time limits on HUD assisted households
- Cutting funding for and making significant changes to Homeless Assistance Grants to fund shorter-term, higher-barrier programs
- Zeroing out funding for affordable housing and community development programs like HOME, CDBG, IHBG-C, Native Hawaiian Housing Block Grant, and for HOPWA

Trump Administration's FY27 HUD Budget Request



FY27 Budget Request proposes:

- No State Rental Assistance Block Grant program (FY26 proposal to combine TBRA, PBRA, public housing, Section 811, and Section 202 into one block grant)
 - Slight funding increase for TBRA renewals, but insufficient to cover total renewal costs
 - No additional funding to cover continued assistance for EHV holders
 - Cuts to PBRA, Section 202, Section 811
 - Language prohibiting PHAs from issuing “any new vouchers or otherwise [assisting] new families,” including through Project-Based Vouchers (PBVs), “except vouchers for HUD-Veterans Affairs Supportive Housing (HUD-VASH) and the family unification program.”

Trump Administration's FY27 HUD Budget Request



FY27 Budget Request proposes:

- Eliminating Fair Housing Initiative Program, cutting funding for Fair Housing Assistance Program (FHAP)
- \$30 million in funding for new Program Integrity Initiative, dedicated to “fight fraud, waste, and abuse of Federal housing programs.”
- Eliminating LIHEAP program (HHS budget request)
- Creating a “National Center for Warrior Independence” in Los Angeles, CA, to “restore self-sufficiency and the warrior ethos among homeless veterans through any guidance, requirements, or services needed to ensure that homeless veterans can access housing, receive substance abuse or addiction treatment, and return to productive work and community engagement” (VA budget request)

Trump Administration's FY27 HUD Budget Request



What's Next

House and Senate THUD Appropriations Subcommittees will begin drafting their FY27 spending bills

- House THUD markup scheduled May 21, full House Appropriations Committee markup scheduled June 4
 - Should see the House FY27 spending bill for HUD no later than May 21
- HUD Secretary Scott Turner will testify on HUD budget request; date TBD
- Senate markups, hearings TBD

Goal: Finalize and pass all 12 appropriations bills before October 1

Trump Administration's FY27 HUD Budget Request



Your Advocacy Makes a Difference – Keep Going!

The House and Senate ultimately rejected unreasonable proposals from White House in FY26, and instead provided a significant increase to HUD programs

Contact your members of Congress and urge them to increase funding for HUD's vital affordable housing, homelessness, and community development programs, including NLIHC's top priorities:

- Full funding to renew all existing TBRA contracts, including continued assistance for Emergency Housing Voucher holders
- At least \$5.1 billion for HUD's Homeless Assistance Grants program
- Increased funding for public housing operations and capital needs to help maintain and efficiently operate public housing.
- Full funding for all Section 811 PRA and PRAC renewals, at least \$424 million for new Section 811 PRA contracts, and full funding to renew all existing contracts under the Section 202 Housing for the Elderly program.
- At least \$15 million for HUD's Eviction Protection Grant Program (EPGP)
- At least \$1.1 billion for the Indian Housing Block Grant (IHBG) program and \$150 million for the IHBG-Competitive program
- Language to block any attempt by the executive branch to withhold, rescind, or otherwise cut congressionally-approved funding

Trump Administration's FY27 HUD Budget Request



Your Advocacy Makes a Difference – Keep Going!

Individuals: Contact your members of Congress

- <https://nlihc.quorum.us/campaign/157066/>

Organizations: Sign CHCDF's FY27 letter calling on the highest possible funding for HUD programs

- <https://nlihc.quorum.us/campaign/81477/>

NPRM: Work Requirements & Time Limits in HUD-Assisted Housing



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NPRM: Work Requirements & Time Limits in HUD-Assisted Housing



Janelle Scott

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COUNCIL OF LARGE PUBLIC HOUSING AUTHORITIES

Workforce Development in Federally Assisted Housing

National Low Income Housing Coalition HoUsed Campaign Call | 2026



About CLPHA

85

Member PHAs

representing virtually every major
metro area

40%

of Public Housing

managed by CLPHA members
nationwide

1M+

Households Served

low-income families across all
programs

Who Lives in Federally Assisted Housing?

Source: CLPHA, *Who Lives and Works in Federally Assisted Housing* (PAHRC, 2018; CBPP, 2025)

Nearly

74%

of PHA residents are
children, elderly, or disabled

Not work-able populations

- 37%** Children (under 18)
- 23%** Elderly (age 62+)
- 14%** Disabled (under 62)

26%

of residents are able-bodied, working-age adults who would potentially be subject to a work requirement

78%

of non-working able-bodied adults cite school attendance or family obligations as the reason — not lack of motivation (PAHRC, 2018)

87%

of households with an able-bodied, working-age member reported at least one member working or recently worked

28%

of assisted households list wages as their primary income source; Welfare are primary in 1.3% of households

CLPHA Members Are Leading on Workforce Development

PHAs have long pioneered voluntary, locally driven approaches to self-sufficiency

FSS

Family Self-Sufficiency Programs

CLPHA members have enrolled thousands of families in FSS programs, generating millions in escrow savings. One cohort's 62 graduates completed with \$890K in escrow and avg. income gains exceeding \$35,000.

WFD

Long-Standing Workforce Centers

Several CLPHA members operate workforce centers with 30+ years of history, serving 1,600+ clients annually and placing nearly 15,000 residents in growth-sector jobs.

YTH

Youth Workforce Programs

Youth-focused programs run by CLPHA members provide life skills, vocational training, and college prep; serving residents from 6th grade through post-secondary completion for over four decades.

FOC

Financial Opportunity Centers

Bundled service models combining financial coaching, income supports, and employment services have served 600+ individuals, with 21% increasing their net worth and measurable debt reduction.

What Effective Workforce Policy Requires

Key conditions for any approach that meaningfully advances resident self-sufficiency

01 Local Context Must Drive Design

PHAs operate in vastly different housing markets, labor markets, and communities. Effective workforce policy must account for this variation; what works in one community may not be feasible or appropriate in another.

02 Adequate Resourcing Is Non-Negotiable

Meaningful implementation requires dedicated funding for case management, compliance infrastructure, partner coordination, and staff capacity. Underfunded implementation does not serve residents or achieve the policy's goals, regardless of program design.

03 Evidence Should Inform the Approach

Research on work requirements across MTW PHAs and analogous programs such as TANF, Medicaid, and SNAP shows mixed results that vary significantly based on local labor market conditions, available supportive services, and program design. A one-size-fits-all approach is not supported by the evidence.

04 Supportive Services Are Prerequisites, Not Add-Ons

Workforce policy cannot succeed without the underlying infrastructure to support it, including robust FSS and ROSS programs, benefits cliff mitigation, and meaningful connections to local workforce development systems. These are not optional enhancements; they are foundational.

CLPHA Resources on Workforce Development

Available at clpha.org/WorkforceDevelopment

Building an America That Works for Everyone

Member case studies highlighting voluntary workforce development programs at CLPHA members across the country

Work Requirement Research Shows Major Costs with Minor Impact

Research brief summarizing evidence on work requirement outcomes from MTW PHAs and analogous federal programs

Who Lives and Works in Federally Assisted Housing

Demographics one-pager on the populations PHAs serve, including income, employment, and household composition data

NPRM: Work Requirements & Time Limits in HUD-Assisted Housing



Korey Lundin

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National Housing Law Project

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HUD's Proposed Rules Cutting Housing Benefits with Work Requirements and Time Limits

April 14, 2026

What housing programs do the proposals cover?

“Establishing Flexibility for Implementation of Work Requirements and Term Limits” – FR-6520-P-01

Comments due Friday, May 1, 2026, by 11:59pm Eastern



FEDERAL REGISTER
The Daily Journal of the United States Government



PR Proposed Rule

Establishing Flexibility for Implementation of Work Requirements and Term Limits

A Proposed Rule by the Housing and Urban Development Department on 03/02/2026



What housing programs do the proposals cover?

- **Public Housing**
- **Housing Choice Voucher Program - HCVP**
- **Project-Based Vouchers - PBV**
- **Project-Based Rental Assistance - PBRA**
- **Excludes:**
 - Work requirements are not allowed for the Family Unification Program
 - Time limits are not allowed for the Family Unification Program when used to serve foster youth
 - Time limits and work requirements are not allowed for the Foster Youth to Independence initiative or the HUD-Veterans Affairs Supportive Housing (HUD-VASH) program

What do the proposed rules do?

- **Allow Public Housing Agencies and PBRA owners to establish requirements for “work eligible adults” to work up to 40 hours per week and/or two-year time limits for the family to receive a housing subsidy**
- **Allows PHAs and PBRA owners to terminate the assistance of those who do not comply with the work requirements or time limits policies**
- **Discretionary, not mandatory** – States and municipalities could pass laws to require PHAs or owners to implement these policies

Where are we in the process?

- **September 26, 2025** – Draft rule leaked by ProPublica
- **March 2, 2026** – Rule published
- **April 14, 2026** – Today
- **May 1, 2026** – Comments due in 16 days
- **????** – HUD either withdraws the rule or publishes the final rule

Work Requirements

What could a work requirement policy look like?

- **Mandate up to 40 hours of work for any “work eligible adult”**
- **Mandate frequent or burdensome reporting requirements**
- **Allow for termination of assistance for noncompliance with the amount of work or the reporting requirements**
- **Hardship policy is only required to have very limited exceptions**

Applies to individuals - A member of an assisted family who is between ages 18 to 61

Excludes:

- Residents with a disability or a primary caretaker of such individual as defined in 24 C.F.R. § 5.403,
- Pregnant residents
- Residents who are the primary caretaker for a child under 6 years of age or for temporarily incapacitated individuals,
- Residents who are enrolled as a student in an institution of higher education as defined in section 102 of the Higher Education Act of 1965 (for a duration determined by the PHA/Owner).

Work Requirements

How can policies be implemented?

- **Cannot require work as a condition of admission**
- **Must give residents three month's notice prior to implementation of work requirements policy**
- Work requirement policy must be furnished to all residents, included in PBRA and Public Housing leases
- PBRA Owners must revised their Tenant Selection Plan; For Voucher plans, PHAs must include in PHA Plan and Admin Plan

Time Limits

What could a time limit policy look like?

- **Policy could allow termination once a family reaches the two-year time limit.** The proposed rule does not mention or discuss the protections tenants in subsidized housing have.
- **Hardship policy with no exceptions other than the one required exception for “determination of disability status”-OR-**
Hardship policy which allows PHA or Owners to keep the tenants they like and terminate those they don't after two years
- **Adopt an admission policy which bars anyone who previously reached a two-year time limit**
- **Could include all members of the family, including the children**

Applies to families, not individuals, with these exceptions:

- Elderly family (62 years or older) - 24 C.F.R. § 5.403
- Disabled family - 24 C.F.R. § 5.403
- Families the PHA/Owner chooses to exclude

Time Limits

How can policies be implemented?

- **Must give current residents three month's notice** by furnishing a copy of the time limit policy to each current resident and to resident organizations
- Time limit policy must be furnished to all residents, and included in PBRA and Public Housing leases
- PBRA Owners must revised their Tenant Selection Plan; For Voucher plans, PHAs must include in PHA Plan and Admin Plan
- Notice of time limit policy required for applicants to PBRA and public housing, but not voucher programs

For both Work Requirements and Time Limits

Supportive Services

- **PHAs and PBRA Owners must provide “Supportive Services” a PBRA Owner or PHA will implement are required to be in PBRA and public housing work requirement and time limit policies, but are not required to be in voucher policies**
- **The proposed rule does not define “Supportive Services” and there is an errant reference to a definition which is not actually created by the proposed rule.**
- **Different policies can be applied to different properties** – This is explicitly allowed for PBV program, but no language explicitly allowed for PBRA, PH, and HCVP. This could allow for targeting of specific properties
- **HUD is providing no money to implement policies and will not provide any new oversight**

For both Work Requirements and Time Limits

Supportive Services

PHA or owner (or a partner organization) must provide “supportive services” which are not actually defined in the text of the proposed rule. This list is only found in the supplementary information:

- **Making referrals to a local workforce development center or other community service provider;**
- Child care that provides sufficient hours of operation and serves an appropriate range of ages;
- Transportation necessary to receive services or commute to their place(s) of employment;
- Education, including remedial, completion of high school or attainment of a high school equivalency certificate, or in pursuit of a post-secondary degree or certificate;
- Job training, preparation, and counseling; job development and placement and follow up assistance after job placement;
- Substance use treatment and counseling, and health, dental, mental health and health insurance services;
- Training in financial literacy, such as training in financial management, financial coaching, asset building, and money management; and
- **Any other services and resources, including case management, optional services, and specialized services appropriate to assist eligible families to achieve economic independence and self-sufficiency.**

- **Proposed rule has lots of inconsistencies between the four programs it covers (public housing, HCVP, PBV, and PBRA)**
- **Not clear whether this is intentional or just poor drafting**
- **These discrepancies are discussed in more detail in [NHLP's Legal Analysis](#) of the proposed rule**

Can states or municipalities require implementation?

- Two states have laws which are currently not in effect, but could be triggered by the rule:
 - In 2018, [Wisconsin passed a law](#) which requires PHAs to create “employability plans” and conduct “controlled substance abuse screening” for “able-bodied and either unemployed or underemployed” public housing residents.
 - In 2023, [Arkansas passed a law](#) which requires PHAs to implement a twenty-hour per week requirement for “able-bodied adults.” [HUD Secretary Scott Turner has praised this law as an example for other states to follow.](#)

Can states or municipalities prohibit implementation?

- **Maybe?** Two states are considering passing laws which would prohibit implementation. These proposals exempt existing Moving to Work PHAs
 - **California** ([AB-2128](#))
 - **Illinois** ([SB3084](#))

Submit comments!

- Impact on residents
- Research on work requirements or time limits
- What (if any) impact there will be on self sufficiency
- Impact on people moving and porting
- If you are in a MTW jurisdiction what that experience has been for residents
- Cost to implement for PHAs
- Lack of clarity in definitions
- HUD does not have legal authority

Resources on rule from NHLP and our friends

- [NHLP's One-pager](#)
- [NHLP's Legal Analysis](#)
- [NHLP & CLASP's Comment Template](#)
- [NLIHC's Comment Template](#)
- [CLASP's Comment Templates](#)
- [NHLP's Compilation of research](#)
- [NHLP/SPLC/NLIHC/JIA/CLASP Fact Sheet](#)
- [NLIHC/NHLP/CLASP State Fact Sheets](#) with the potential impacts of the proposed rule for every state

Who do I contact at NHLP about these proposals?

Questions about commenting?

Korey Lundin – klundin@nhlp.org – (415) 432-5725

[Schedule appointment with Korey](#)

Questions about legal strategies?

Hannah Adams – hadams@nhlp.org – (415) 636-8385

NPRM: Work Requirements & Time Limits in HUD-Assisted Housing



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NPRM: Work Requirements & Time Limits in HUD-Assisted Housing



Jesse Fairbanks

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What are the consequences?

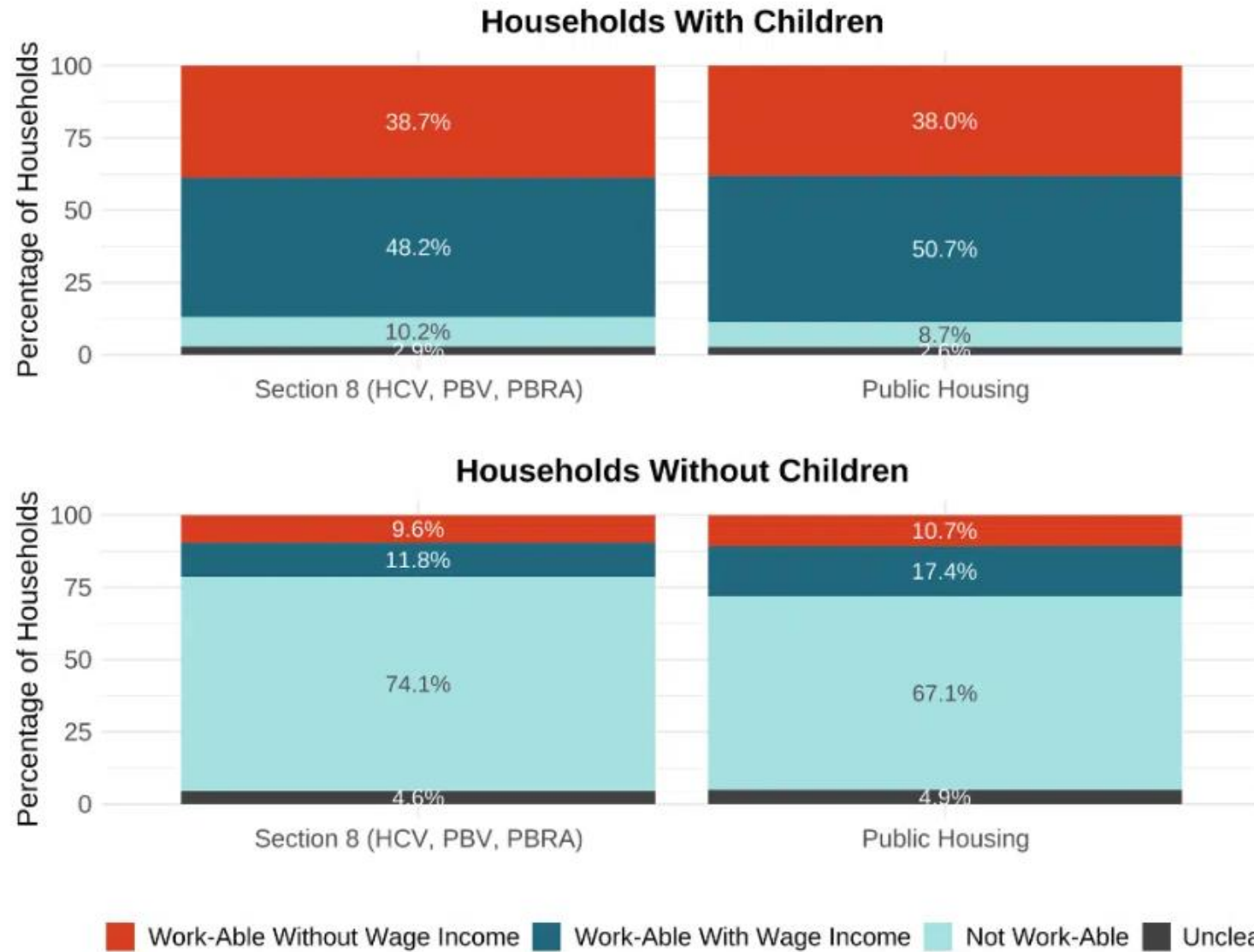
HUD's Plan to Cut Housing Benefits with
Work Requirements and Time Limits

CENTER FOR LAW AND SOCIAL POLICY

JESSE FAIRBANKS, POLICY ANALYST

People who are exempt and work low quality jobs will suffer most from this rule.

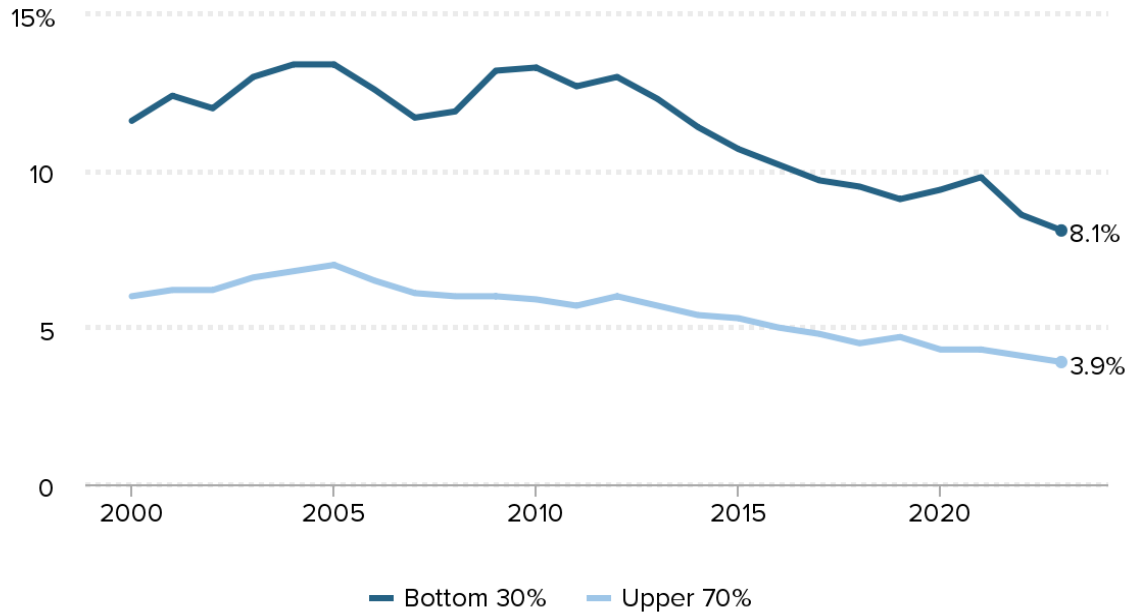
Figure 5. Households by Work-Able Status, Wage Income, and Presence of Children, 2024



Sources: U.S. Department of Housing and Urban Development, NYU Furman Center

Workers in low-income households experience more hour variability than those in higher income households

Share of workers that report their hours vary, conditional on being employed, 2000–2023



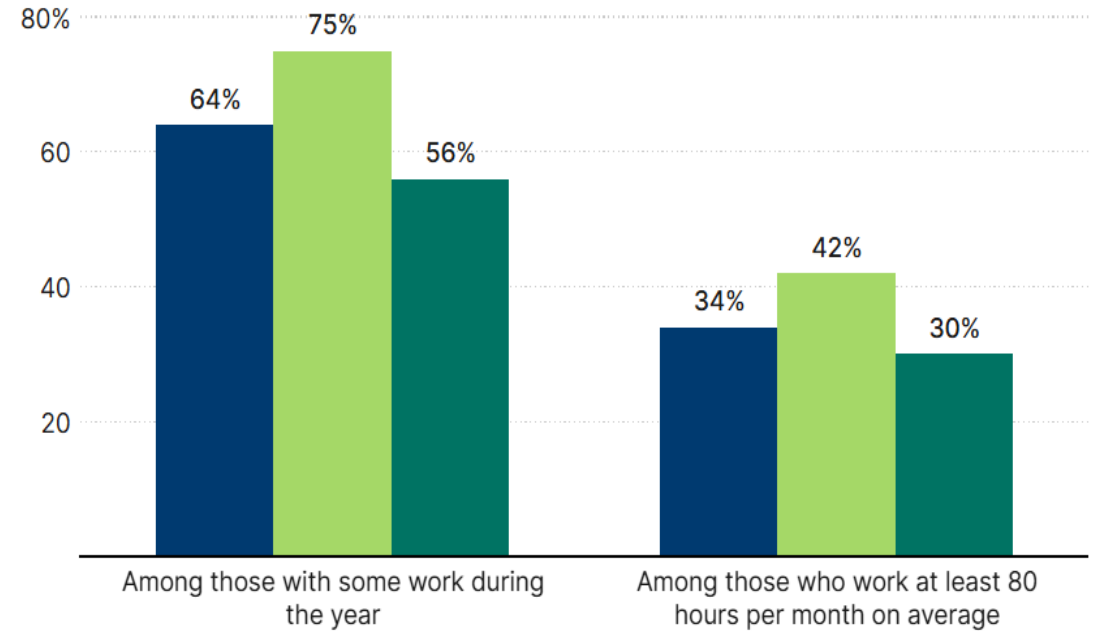
Notes: We define the bottom 30% of households based on their total income from wages and salaries.

Source: Author's analysis of EPI CPS Outgoing Rotation Group microdata extracts, [Version 1.0.59](#) (EPI 2024).

Economic Policy Institute

Figure 3: Share of low-income service workers who worked less than 80 hours in at least one month, 2022

■ All ■ No minor child in the household ■ Lives with a minor child



Source: Survey of Income and Program Participation 2024.

Note: We restrict the sample to adults who report at least some work hours and earnings in 2022, who are present for all of 2022, and who lived with the same individuals across all months. Low-income individuals are respondents living in a household with an income-to-poverty ratio at or below 130 percent of the federal poverty level across the calendar year. See the appendix for additional details.

THE HAMILTON PROJECT

Implementing this rule will drain providers resources and hinder private landlord participation.

What can you do?

Immediate Actions:

- Submit a unique comment to the federal register.
- Sign onto CLASP's organizational comment.

Long-Term Actions:

- Oppose bills in your community that would mandate work requirements or time limits in rental assistance programs.
- Talk to your state and local legislators about passing preemption laws.
- Bust myths about people experiencing poverty in everyday conversation.

Take Action



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Resources & Next Steps



- **Contact** your members of Congress: <https://nlihc.quorum.us/campaign/157066/>
- **Become a member** of NLIHC: www.nlihc.org/membership
- **Connect** to your Field Team member: outreach@nlihc.org

**Join our next National HoUSed Campaign Call:
Tuesday, April 28 at 4:00 -5:00 pm ET**