

Congress of the United States

Washington, DC 20515

May 1, 2026

The Honorable Scott Turner
Secretary
Department of Housing & Urban Development
451 Seventh Street, SW
Washington, DC 20410

Regulations Division
Office of the General Counsel
Department of Housing & Urban Development
451 Seventh Street, SW, Room 10276
Washington, DC 20410-0500

Re: Establishing Flexibility for Implementation of Work Requirements and Term Limits, Docket No. FR-6520-P-01, RIN 2501-AE15

Dear Secretary and General Counsel:

The Congressional Renters Caucus submits this comment in opposition to the U.S. Department of Housing and Urban Development's ("HUD") Notice of Proposed Rulemaking, "Establishing Flexibility for Implementation of Work Requirements and Term Limits." Allowing public housing agencies (PHAs) and owners of HUD-assisted housing to take away housing assistance from residents who exceed arbitrary time limits or who do not meet rigid work requirements will not facilitate housing affordability. It will instead lead to more people experiencing needless evictions and, in worst cases, homelessness. We strongly oppose this proposed rule and urge HUD to withdraw it.

The Congressional Renters Caucus was founded to ensure that Americans have access to an adequate supply of safe, high quality, and affordable rental housing, remove administrative barriers to renting, and expand federal rental assistance programs to ensure that all eligible households have access. Across the country our constituents often struggle to find affordable rental housing. Many of our members represent districts where well over half of households rent, and the steep increases in rents have had a devastating impact on the ability of families and workers to find and continue to live in adequate housing, causing widespread housing insecurity and a national homelessness emergency.

Our 40-member caucus serves as a platform to engage in constructive dialogue on issues impacting everyday renters. We strongly believe that there must be a coordinated effort in Congress to advocate for the millions of renters in our country. This includes efforts to support constituents that are currently residents of HUD subsidized housing.

We believe that everyone deserves to live in a safe, accessible, and affordable home. Federal rental assistance programs help more than 10 million people¹ – including families with children, older adults, people with disabilities, full-time caregivers, and workers paid low wages – stay housed. However, because of chronic underfunding, only one in four households that qualify receive any form of rental assistance.²

¹ Center on Budget & Policy Priorities. (2025). United States Federal Rental Assistance Fact Sheet. Retrieved from: <https://www.cbpp.org/sites/default/files/atoms/files/12-10-19hous-factsheet-us.pdf>

² Acosta, S., & Gartland, E. (2025). To Better Meet Record Levels of Need, Keep Families Housed, Congress Must Increase 2025 Funding for Housing Assistance. Center on Budget and Policy Priorities. Retrieved from: <https://www.cbpp.org/research/housing/to-better-meet-record-levels-of-need-keep-families-housed-congress-must-increase>; 91 Fed. Reg. 10016, 10019 (Mar. 2, 2026) (noting that 1 in 4 eligible families access HUD assistance).

The Congressional Renters Caucus opposes HUD’s proposed rule to allow PHAs and project-based rental assistance owners to implement work requirements and time limits because such policies would create more barriers to housing stability for individuals and families. In fact, allowing a two-year time limit on HUD rental assistance would put millions of families at risk of losing their homes.³ While the proposal would not require adoption of these policies, HUD’s proposed changes would allow states to mandate time limits or work requirements. HUD Secretary Scott Turner has touted these state laws and opined the Arkansas law mandating work requirements has “set the example for more states to follow.”⁴

HUD’s proposal also exceeds the agency’s existing statutory authority. Congress has established the Moving to Work (MTW) Demonstration as a narrow pathway for HUD to allow PHAs to adopt work requirements and time limits. HUD’s proposed rule would circumvent the will of Congress by bypassing the MTW process all together. Congress have previously considered, and previously rejected, all prior attempts to impose broad time limits or work requirements in federally subsidized housing.

The proposed rule is rooted in false, harmful stereotypes that people who receive rental assistance do not work. In fact, most people in HUD-assisted housing who can work, do work.⁵ However, many working people still need rental assistance to help them afford housing because housing costs far exceed wages.

Our caucus represents 16 states that would each see devastating impacts under a two-year time limit on HUD assistance⁶:

1. **CA:** 306,800 people in California - including 137,800 children – will be at risk of losing their assistance and facing eviction
2. **NY:** 343,000 people in New York – including 148,100 children – will be at risk of losing their assistance and facing eviction
3. **TX:** 239,800 people in Texas – including 134,600 children – will be at risk of losing their assistance and facing eviction
4. **IL:** 153,400 people in Illinois – including 73,400 children – will be at risk of losing their assistance and facing eviction
5. **FL:** 149,700 people in Florida – including 80,200 children – will be at risk of losing their assistance and facing eviction
6. **PA:** 120,200 people in Pennsylvania – including 61,700 children – will be at risk of losing their assistance and facing eviction

³ Fisher, W., & Gartland, E. (2025). 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. Retrieved from: <https://www.cbpp.org/research/housing/rental-assistance-time-limits-would-place-more-than-3-million-people-half-of-them> (estimating that over 3 million people would be at risk of losing rental assistance with a 2-year time limit).

⁴ Scott Turner Sarah Huckabee Sanders, *Why HUD’s proposed rule is a springboard to the American Dream*, Fox News Digital (March 9, 2026); HUD Press Release 26-021, *ICYMI | Secretary Turner & Governor Sanders in Fox Digital: “Why HUD’s proposed rule is a springboard to the American Dream,”* (March 24, 2026).

⁵ Mazzara A. & Sard, B. (2018). [Chart Book: Employment and Earnings for Households Receiving Federal Rental Assistance](#). Washington, DC: Center on Budget and Policy Priorities.

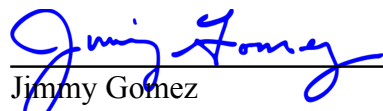
⁶ Fisher, W., & Gartland, E., *supra* note 3.

7. **MA:** 115,000 people in Massachusetts - including 51,100 children – will be at risk of losing their assistance and facing eviction
8. **NJ:** 109,500 people in New Jersey - including 51,500 children – will be at risk of losing their assistance and facing eviction
9. **NC:** 93,100 people in North Carolina – including 51,700 children – will be at risk of losing their assistance and facing eviction
10. **MI:** 83,200 people in Michigan – including 46,400 children – are at risk of losing their assistance and facing eviction
11. **MN:** 58,900 people in Minnesota – including 32,600 children – will be at risk of losing their assistance and facing eviction
12. **WA:** 56,300 people in Washington – including 28,300 children – will be at risk of losing their assistance and facing eviction
13. **OR:** 28,500 people in Oregon – including 14,400 children – will be at risk of losing their assistance and facing eviction
14. **DC:** 16,000 people in D.C. – including 6,700 children – will be at risk of losing their assistance and facing eviction
15. **NM:** 13,100 people in New Mexico – including 7,100 children – will be at risk of losing their assistance and facing eviction
16. **VT:** 5,800 people in Vermont – including 3100 children – will be at risk of losing their assistance and facing eviction

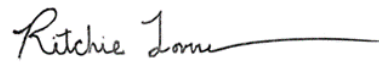
These are just a few examples of how time limits and work requirements would harm HUD tenants. HUD should withdraw this proposal in its entirety and instead work with policymakers to ensure that everyone has access to safe, accessible, and affordable housing.

Thank you for the opportunity to comment. Please contact our offices, including Chair of the Renters Caucus, Rep. Jimmy Gomez's office for any questions or further information regarding these comments.


Sincerely,



Jimmy Gomez
Member of Congress



Ritchie Torres
Member of Congress



Ayanna Pressley
Member of Congress

Danny K. Davis

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Sydney Kamlager-Dove

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Gilbert Ray Cisneros, Jr.

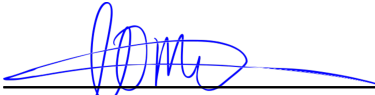
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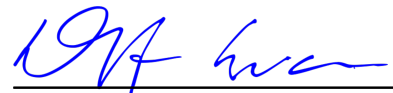
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Yvette D. Clarke
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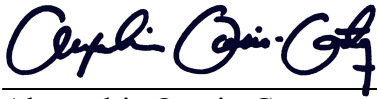
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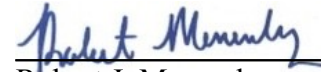
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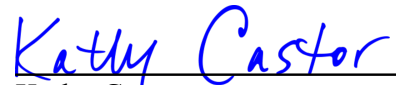
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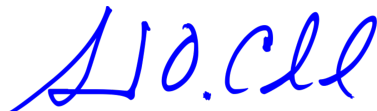
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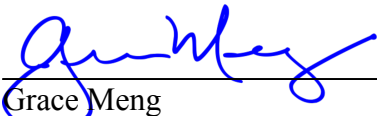
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