



May 1st, 2026

Office of General Counsel, Rules Docket Clerk
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

RE: Proposed Rule, “Establishing Flexibility for Implementation of Work Requirements and Term Limits” | Docket No. FR-6520-P-01 | 24 CFR Parts 5, 960, 982, and 983

We write on behalf of our constituents to urge you to withdraw HUD’s proposed rule that would allow public housing agencies and owners of subsidized housing to impose work requirements and time limits on families receiving federal rental assistance. Massachusetts is facing a severe housing shortage, shelter systems are operating well beyond capacity, and waitlists for subsidized housing run for years in most communities. In this environment, federal rental assistance is not supplemental income for most families who receive it; it is what keeps them housed. This rule would permit the termination of that assistance for thousands of Massachusetts households based on bureaucratic requirements that have no demonstrated connection to housing stability or self-sufficiency.

The scope of this rule is broader than HUD has described. The rule would not make modest adjustments to an existing work support framework. It would authorize public housing agencies and Section 8 property owners to impose time limits as short as two years on non-elderly, non-disabled families, regardless of whether those families can afford market rent at the end of that period. It would also permit work activity requirements of up to forty hours per week for covered adults. These are significant departures from existing law—policies Congress has repeatedly declined to authorize, and that no Moving to Work agency has ever implemented at the scale this rule would allow.

Congress has explicitly considered and rejected the broad policies this rule would impose. The Quality Housing and Work Responsibility Act of 1998 established only a limited community service requirement—eight hours per month under 42 U.S.C. § 1437j(c)—for non-employed adults in public housing, and declined to apply any work requirement to the voucher program. Congress has since used the Moving to Work demonstration to allow a small number of agencies to experiment with time limits and work requirements under controlled conditions. No Moving to Work agency has ever attempted a two-year time limit. Of the agencies that have tried longer-term policies, eleven of nineteen eventually abandoned them, citing the absence of

well-paying jobs, skyrocketing market rents, and the absence of sufficient supportive services to help residents achieve self-sufficiency.¹ The proposed rule does not address this record. It would instead extend to every PHA and property owner in the country policies that a small set of demonstration agencies found unworkable under more favorable conditions.

HUD has acknowledged that there is no established research base demonstrating the long-term effectiveness of these policies², and what research does exist cuts the other way. A rigorous study found that families offered only 18 months of rental assistance were twice as likely to be homeless or doubled up after three years compared to families offered ongoing, need-based assistance. More than one in three families who received time-limited assistance were homeless or doubled up within three years. That was twice the rate for families who received ongoing, need-based help—and the same rate as families who received no additional assistance at all.³ The Administration has argued that time limits and work requirements will encourage self-sufficiency, but the evidence does not support that claim. Most people subject to work requirements in other programs remain in poverty even when employment rates rise in the short term, and the earnings gains are not sufficient to cover market rent.⁴

The rule's premise does not reflect the actual employment profile of people living in HUD-assisted housing. The large majority of non-disabled adults in HUD programs who are not subject to caregiving obligations already work. Eighty-one percent of non-disabled adults without young children receiving rental assistance worked in the past year.⁵ Those who do not work are overwhelmingly attending school, serving as caregivers, or managing health conditions. The gap here is not between work and non-work; it is between what low-wage jobs pay and what rent costs. Seventeen of the twenty-five most common occupations in the country pay median wages below what a full-time worker needs to afford a modest one- or two-bedroom apartment.⁶ A two-year time limit does not change that arithmetic.

The impact on Massachusetts would be severe. Under the proposed rule, 115,000 people in our state are at risk of losing rental assistance, including 51,100 children and 79,500 people in

¹National Housing Law Project, "Legal Analysis of Proposed Rule FR-6520-P-01," March 25, 2026, <https://www.nhlp.org/wp-content/uploads/Benefits-Cuts-Legal-Analysis.pdf>; see also [Local Housing Solutions, "Work Requirements and Time Limits in Housing Assistance: What We Know"](#); [Tacoma Housing Authority, "An Assessment of the Housing Opportunity Program," December 2021](#) (finding only 6% of participants achieved self-sufficiency at time of program exit under time limits; participants were three times more likely to achieve self-sufficiency if not subject to term limits).

²National Housing Law Project, "Legal Analysis of Proposed Rule FR-6520-P-01," March 25, 2026, <https://www.nhlp.org/wp-content/uploads/Benefits-Cuts-Legal-Analysis.pdf>; see also [Local Housing Solutions, "Work Requirements and Time Limits in Housing Assistance: What We Know"](#); [Tacoma Housing Authority, "An Assessment of the Housing Opportunity Program," December 2021](#) (finding only 6% of participants achieved self-sufficiency at time of program exit under time limits; participants were three times more likely to achieve self-sufficiency if not subject to term limits).

³Daniel Gubits et al., [Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families](#) (Washington, DC: U.S. Department of Housing and Urban Development, October 2016).

⁴CLASP, ["Work Requirements Won't Lead to Better Employment or Economic Outcomes,"](#) 2023; LaDonna Pavetti, ["Work Requirements Don't Cut Poverty, Evidence Shows,"](#) Center on Budget and Policy Priorities, June 7, 2016.

⁵NHLP, CLASP, [Justice in Aging, NLIHC, and SPLC, "Work Requirements and Time Limits in Rental Assistance Programs Will Worsen Housing Instability,"](#) January 2026 (citing Mazzara and Sard, CBPP, 2018).

⁶National Low Income Housing Coalition, [Out of Reach: The High Cost of Housing](#) (Washington, DC: NLIHC, 2025).

working families.⁷ Behind those figures are families who are currently housed and working, many of whom have organized their lives around assistance they are lawfully entitled to receive. Terminating that assistance after an arbitrary deadline does not help them pay rent; it puts them at risk of eviction and homelessness in a market where a minimum-wage worker would need to work more than 120 hours a week to afford a modest two-bedroom apartment.⁸ A time limit changes none of that. It simply ends the assistance that allows these families to stay housed.

The rule also imposes significant costs on the agencies and property owners who administer these programs, without providing any new funding to cover compliance. PHAs and property owners who implement time limits or work requirements are required to provide supportive services to affected residents, but the rule explicitly states that neither Housing Choice Voucher administrative fees nor project-based funds may be used for those services.⁹ This is an unfunded mandate. In another context, when Medicaid work requirements were implemented across five states, the Government Accountability Office found that taxpayer implementation costs reached nearly \$408 million over three years, before a single dollar was spent on services to help residents comply.¹⁰ The harm to program function extends beyond compliance costs. The dependable payment stream vouchers provide is the primary reason many private landlords agree to participate in the program. Abruptly terminating assistance for stably housed families on an arbitrary deadline would undermine that reliability, reducing landlord participation and narrowing the pool of units available to voucher holders—particularly in lower-poverty neighborhoods where landlord recruitment is already the binding constraint on mobility.¹¹ The proposed rule anticipates none of this.

HUD has said nothing in this rule about fair housing. By permitting different policies at different properties within the same PHA portfolio, the rule gives agencies a ready tool to target residents organizing for better conditions, buildings with disproportionately Black or Latino tenants, or communities where employment discrimination is already a structural barrier. HUD places all fair housing compliance responsibility on the same PHAs and property owners who now have unchecked discretion to apply these policies unevenly—while HUD itself has significantly scaled back fair housing enforcement at the federal level. The proposed rule says nothing about any of this.

The rule also creates a direct conflict with existing tenant protections that federal law already requires. Public housing tenants can only be removed for serious or repeated lease violations or

⁷NLIHC, NHLP, and CLASP, “Work Requirements and Time Limits in Rental Assistance Will Worsen Housing Instability”—State Factsheets, 2026 (reporting Massachusetts-specific figures for proposed rule FR-6520-P-01, including 115,000 people at risk, 51,100 children, and 79,500 people in working families; Massachusetts data is within the combined all-states PDF at this URL).

⁸National Low Income Housing Coalition, *Out of Reach: The High Cost of Housing* (Washington, DC: NLIHC, 2025).

⁹“Establishing Flexibility for Implementation of Work Requirements and Term Limits,” 91 Fed. Reg. 10021, 10024 (March 2, 2026).

¹⁰U.S. Government Accountability Office, *Medicaid Demonstrations: Actions Needed to Address Weaknesses in Oversight of Costs to Administer Work Requirements*, GAO-20-149 (Washington, DC: GAO, October 2019).

¹¹Will Fischer and Erik Gartland, “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, July 18, 2025; Massachusetts-specific figures from NLIHC, NHLP, and CLASP, “Work Requirements and Time Limits in Rental Assistance Will Worsen Housing Instability”—State Factsheets, 2026.

other legitimate reasons, not simply because an arbitrary deadline has passed or because they fell behind on paperwork. The same basic protections apply to tenants in project-based and voucher programs. The proposed rule would allow termination of assistance for families who reach the end of a time limit or fail to meet documentation requirements, without explaining how that qualifies as a legitimate reason for removal under existing law. That conflict is not addressed anywhere in the proposed rule, and it creates real legal risk for any housing agency that tries to enforce these policies.

Some proponents of time limits argue that because fewer than one in four eligible households receive any rental assistance today¹², it is reasonable to rotate subsidies among families in need. That argument does not hold up on closer examination. Shifting assistance from one household to another does not reduce the number of people who need help affording rent—it simply ensures that no family receives what rental assistance is intended to provide: a stable home. A policy of deliberate churn is not a substitute for adequate funding.¹³

This is not a letter opposing policies that help people find and keep work. Programs that connect residents to job training, child care, and stable employment have actually worked and deserve expanded investment. This rule funds none of that and requires none of it; it allows agencies to terminate housing assistance for families who cannot comply with requirements that many of them cannot reasonably meet. What follows from that is not greater self-sufficiency—it is more eviction and more homelessness. We urge you to withdraw this rule.

Sincerely,

Jo Comerford
State Senator
Hampshire, Franklin, Worcester district

Sal N. DiDomenico
State Senator
Middlesex and Suffolk district

Patricia D. Jehlen
State Senator
Second Middlesex district

James B. Eldridge
State Senator
Middlesex and Worcester district

Cindy F. Friedman
State Senator
Fourth Middlesex district

Michael F. Rush
State Senator
Norfolk and Suffolk district

¹²[NHLP, CLASP, Justice in Aging, NLIHC, and SPLC, “Work Requirements and Time Limits in Rental Assistance Programs Will Worsen Housing Instability,”](#) January 2026 (citing Mazzara and Sard, CBPP, 2018).

¹³[Will Fischer and Erik Gartland, “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, July 18, 2025; Massachusetts-specific figures from [NLIHC, NHLP, and CLASP, “Work Requirements and Time Limits in Rental Assistance Will Worsen Housing Instability”—State Factsheets,](#) 2026.

John F. Keenan
State Senator
Norfolk and Plymouth district

Adam Gomez
State Senator
Hampden district

Rebecca L. Rausch
State Senator
Norfolk, Bristol and Middlesex district

Pavel M. Payano
State Senator
First Essex district

Robyn K. Kennedy
State Senator
First Worcester district

Brendan P. Crighton
State Senator
Third Essex district

William J. Driscoll
State Senator
Norfolk, Plymouth and Bristol district

Vanna Howard
State Senator
First Middlesex district

Cc: Governor Maura Healey; Massachusetts Congressional Delegation