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April 24, 2026

Regulations Division, Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410

Re: HUD's Notice of Proposed Rulemaking, "Establishing Flexibility for Implementation of Work Requirements and Term Limits," Docket No. FR-6520-P-01

On behalf of the undersigned residents and community members, we strongly oppose any efforts to impose time limits or work requirements on rental assistance on U.S. Department of Housing and Urban Development (HUD) rental assistance programs.

Housing stability is the foundation for family wellbeing – impacting education, health, safety, and economic opportunity. HUD's core rental assistance programs, like the Housing Choice Voucher program, are [proven](#) to reduce homelessness, support upward economic mobility, improve health outcomes, and keep communities stable. These programs serve those most in need, and [69% of Housing Choice Voucher recipients are seniors, children, or people with disabilities.](#)

Time limits and work requirements threaten family stability and economic progress, with no evidence of improving self-sufficiency. Justifications for work requirements and time limits rest on the false assumptions that people who receive benefits do not work and must be compelled to do so. These assumptions are rooted in ugly stereotypes and not the reality of families served by these programs.

We urge the rejection of any policy actions that would implement time limits and work requirements for HUD rental assistance recipients for the following reasons:

1. Time Limits Would Devastate Housing Stability, Family Success, and Local Economies

- It is estimated that a two-year federal limit on assistance would affect roughly **70% of work-able households** currently receiving assistance, leading to a loss of housing assistance for nearly **1.4 million** of the poorest renters and threatening a widespread eviction crisis that will displace families and increase their likelihood of unemployment and educational losses.
- [Research](#) shows that when families using housing vouchers move from high-poverty to low-poverty neighborhoods, the length of time children spend growing up in low-poverty neighborhoods is directly linked to their positive outcomes, including likelihood of attending college and to be higher earning adults. Implementing arbitrary time limits removes the long-term economic mobility benefits of the Housing Choice Voucher program.
- Landlords in the private rental market who rent to households using Housing Choice Vouchers are [accustomed to the long-term structure of the current program](#). If households lose their subsidy after two years, landlords are likely to be less willing to rent to these households and lead to dramatic impacts on rental property owners and local economies.

2. Work Requirements Fail to Address Essential Realities

- Approximately [60% of working-age, non-disabled households](#) receiving HUD rental assistance include at least one working adult. Work mandates would create additional administrative burdens that penalize many families already contributing to the workforce.
- Work mandates ignore the realities of the housing and labor markets people with low incomes face. Rents are simply too high for most low-paid workers to afford, and employers are not paying sufficient wages. [Fewer than half of all](#)

[workers](#) earn wages that would be high enough to afford rent for a modest one-bedroom home if they worked 40 hours a week.

3. History Demonstrates Lack of Effectiveness of Similar Policies

- [Public housing authorities](#) that have experimented with work requirements and time limits have documented limited gains in employment or income, rising program costs, and little evidence these policies strengthen family economic mobility.
- Examples from other public safety net programs show similar failures. In the case of the Supplemental Nutrition Assistance Program, work requirements [dramatically reduce program participation](#) without actually [increasing employment or earnings](#).

We are the real families who will be impacted by these policies. We are working individuals caring for children, aging parents, and ourselves. We deserve dignity and respect, not punitive policies built on unfair assumptions.

Please stand with us in rejecting this assault on the housing safety net and preserving the promise of affordable, stable homes for all.

Sincerely,

Adria Crutchfield, Executive Director

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- 465. Kelli Henson (Randallstown, MD)**
- 466. Kiara Clanton (Owings Mills, MD)**
- 467. Cecelia Coles (Elkridge, MD)**
- 468. Aretha Anderson (Perry Hall, MD)**
- 469. Tyresa Gross (Baltimore, MD)**
- 470. Erica Gordon (Columbia, MD)**
- 471. Kendra Bumbray (Towson, MD)**
- 472. Shanice Glenn (Owings Mills, MD)**
- 473. Serena Little (Ellicott City, MD)**
- 474. Kimberly Williams (Nottingham, MD)**
- 475. Chiquita Hughes (Towson, MD)**
- 476. Ashley Woods (Owings Mills, MD)**
- 477. De'Undra Harrington (Owings Mills, MD)**
- 478. Sadiqa Mobley (Owings Mills, MD)**
- 479. Autumn Stevens (Glen Burnie, MD)**
- 480. Shadana Miller (Ellicott City, MD)**
- 481. Frank Pinckney (Towson, MD)**
- 482. Alecia Bynum (Bel Air, MD)**
- 483. Mia Harvey (Ellicott City, MD)**
- 484. Erilisa Moore (Severn, MD)**
- 485. Donielle Griffin (Baltimore, MD)**
- 486. Shamea Parker (Owings Mills, MD)**

- 487. Destiny Griffin (Parkville, MD)**
- 488. Chiquita Gaines (Baltimore, MD)**
- 489. Lashiya McGuire (Baltimore, MD)**
- 490. Alannah Johnson (Baltimore, MD)**
- 491. Brionca Davis (Parkville, MD)**
- 492. Tierra Graham (Reisterstown, MD)**
- 493. Taja Joyner (Baltimore, MD)**
- 494. Latisha Norris (Middle River, MD)**
- 495. Martinique Freeman (Baltimore, MD)**
- 496. Jakeya Fulton (Parkville, MD)**
- 497. Crystal Mcgraw (Glen Burnie, MD)**
- 498. Sherrece Corbin (Nottingham, MD)**
- 499. Tyterra Barrett (Ellicott City, MD)**
- 500. Karlya Heartfield (Middle River, MD)**
- 501. Ashley Smith (Baltimore, MD)**
- 502. Marcella Paige (Belcamp, MD)**
- 503. Shkerra Murel (Essex, MD)**
- 504. Brittany Johnson (Baltimore, MD)**
- 505. Danielle Brodie (Owings Mills, MD)**
- 506. Andrea Bland (Owings Mills, MD)**
- 507. Tyshona Webb (Elkridge, MD)**
- 508. Felicia Baines (Hanover, MD)**
- 509. Keonte Wilson (Severn, MD)**
- 510. Marquise Boone (Columbia, MD)**

- 511. Nikeyia Hopkins (Parkville, MD)**
- 512. Paulette Flurry (Baltimore, MD)**
- 513. Christian Miller (Ellicott City, MD)**
- 514. Shannon Smith (Columbia, MD)**
- 515. Christie Melton (Laurel, MD)**
- 516. Ivory Moye (Baltimore, MD)**
- 517. Onaka Rose (Owings Mills, MD)**
- 518. Tana Rouse (Pikesville, MD)**
- 519. Zanika Deshields (Nottingham, MD)**
- 520. Tinika Faulkner (Towson, MD)**
- 521. Antonio Crawford (Glen Burnie, MD)**
- 522. Stephanie Mills (Baltimore, MD)**
- 523. Seanna Cole (Pikesville, MD)**
- 524. Tamira Adair (Bel Air, MD)**
- 525. Tierra Sykes (Baltimore, MD)**
- 526. Lakeya Howard (Baltimore, MD)**
- 527. Dashera Williams (Catonsville, MD)**
- 528. Kiearra Blair (Bel Air, MD)**
- 529. Shakeena Williams (Dundalk, MD)**
- 530. Crystal Vines (Elkridge, MD)**
- 531. Shaniera McIntosh (Havre De Grace, MD)**
- 532. Angela Elliott (Baltimore, MD)**
- 533. Catherine Wilson (Baltimore, MD)**
- 534. Shermere Thompson (Columbia, MD)**

- 535. Ileima Mckinney (Ellicott City, MD)**
- 536. Kourtney Lewis (Baltimore, MD)**
- 537. Tishira Thomas (Odenton, MD)**
- 538. Antionette Jones (Catonsville, MD)**
- 539. Brittany Brown (Windsor Mill, MD)**
- 540. Erica Boyd (Baltimore, MD)**
- 541. Mayajoy King (Towson, MD)**
- 542. Diedre Johnson (Ellicott City, MD)**
- 543. Ebony Mcclenny (Middle River, MD)**
- 544. Reyohna Mason (Baltimore, MD)**
- 545. Christen White (Timonium, MD)**
- 546. Latesha Wooden (Baltimore, MD)**
- 547. Faye Pompey (Parkville, MD)**
- 548. Kara Young (Severn, MD)**
- 549. Tia White (Dundalk, MD)**
- 550. Cynthia Crane (Columbia, MD)**
- 551. Shyanna Mitchell (Hanover, MD)**
- 552. Brittaney Toms (Columbia, MD)**
- 553. Valencia Payne (Randallstown, MD)**
- 554. Olivia Weaver (Owings Mills, MD)**
- 555. Tenyka Miles (Nottingham, MD)**
- 556. Jnai Patterson (Glen Burnie, MD)**
- 557. Dashirah Mckee (Baltimore, MD)**
- 558. Teaire Jones (Westminster, MD)**

- 559. Nicole Jeanpaul (Glen Burnie, MD)**
- 560. Troy Watson (Rosedale, MD)**
- 561. Sierria Baldwin (Laurel, MD)**
- 562. Domanique Powell (Elkridge, MD)**
- 563. Wykeah Williams (Owings Mills, MD)**
- 564. Latoyer Smothers (Parkville, MD)**
- 565. Cynthia Williams (Parkville, MD)**
- 566. Chemere Thompson (Baltimore, MD)**
- 567. LaTisha Rhodes (Halethorpe, MD)**
- 568. Kanika Williams (Baltimore, MD)**
- 569. Nicole Dorsey (Baltimore, MD)**
- 570. Shikiara Harrell (Elkridge, MD)**
- 571. Ta’Nia Taylor (Owings Mills, MD)**
- 572. Candice Mohan (Baltimore, MD)**
- 573. Destiny Wilson (Odenton, MD)**