



May 1, 2026

**SUBMITTED VIA REGULATIONS.GOV**

Regulations Division  
Office of the General Counsel  
Department of Housing and 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**

To the Regulations Division, Office of General Counsel:

We, the undersigned Member of the New Democrat Coalition, submit 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."

In the midst of a housing crisis, the federal government should not undermine stable housing options, particularly for low- and moderate-income families that rely on federal assistance to keep a roof over their heads. Allowing Public Housing Agencies (PHAs) and owners of HUD-assisted housing to deny assistance to residents who exceed arbitrary time limits or who do not meet inflexible work requirements will destabilize families and likely result in homelessness for some. As we tackle affordability challenges in the housing market, we should not erode safety nets that keep families off the streets.

The New Democrat Coalition has long supported policies to develop more housing, providing more affordable and accessible options for Americans. Housing is one of the most fundamental economic issues that the federal government must confront in order to ensure American competitiveness and the survival of the American dream. New Dems has consistently advocated for smart solutions to make communities where everyone has access to safe, decent, affordable housing and the amenities needed to thrive.

Federal rental assistance programs help more than 10 million people<sup>1</sup> access safe, stable, and affordable housing. By putting more barriers in front of Americans who need support, we make it more likely that they will have to choose unsafe housing options or may lose housing altogether. A two-year time limit, as envisioned by HUD's proposed rule, would put more than 3 million people, half of whom are children, at risk of eviction or homelessness.<sup>2</sup> To be sure, this proposal does not require adoption of these policies, but HUD's proposed changes would allow these time and work requirements to come into being at a time where housing is difficult to reach for many. Furthermore, HUD is seeking to provide a path for states to require the adoption of time limits or burdensome work reporting requirements through this rulemaking. This would mean, for example, that PHAs in states enacting such a mandate would be forced to implement these policies without additional federal financial support.

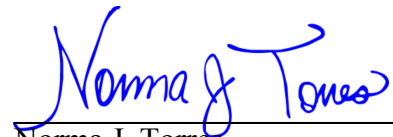
Thank you for the opportunity to comment. Please contact Phil McLaughlin, NDC Member Services Director at [phil.mclaughlin@mail.house.gov](mailto:phil.mclaughlin@mail.house.gov) for any questions or further information regarding these comments.

Sincerely,



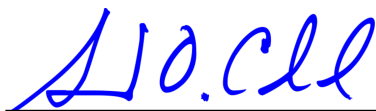
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Emilia Strong Sykes  
Chair  
New Democrat Coalition  
Housing Task Force



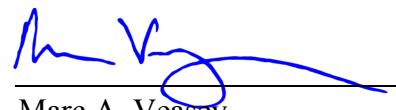
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Norma J. Torres  
Chair  
New Democrat Coalition  
Housing, Infrastructure, &  
Transportation Working Group



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Salud Carbajal  
Member of Congress



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Marc A. Veasey  
Member of Congress

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<sup>1</sup> 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>

<sup>2</sup> 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).

*Kristen McDonald Rivet*

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Kristen McDonald Rivet  
Member of Congress

*Andrea Salinas*

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Andrea Salinas  
Member of Congress

*J. Luis Correa*

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J. Luis Correa  
Member of Congress

*Sarah McBride*

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*Stacey E. Plaskett*

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Stacey E. Plaskett  
Member of Congress

*Adam Smith*

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Adam Smith  
Member of Congress