

Public Comment Template

Federal agencies like HUD are legally required to solicit and consider public comments before finalizing rules. The proposed rule on work requirements and time limits is not yet final, and your input can directly influence the outcome.

Deadline: May 1, 2026

Submit Here: <https://www.regulations.gov/commenton/HUD-2026-0298-0001>

1. State Your Opposition

“I strongly oppose HUD’s proposed rule ‘Establishing Flexibility for Implementation of Work Requirements and Term Limits.’”

2. Example Comment Starters (*Copy, edit, or write your own*)

General Public Example Comments (Clients, Community Members, Advocates)

- “This rule assumes that people are not working enough, but the data shows the opposite. Most people receiving housing assistance who can work already do, and many others are caregiving, attending school, or managing health conditions. Removing assistance after an arbitrary time limit will not change these realities. It will simply push families into homelessness.”
- “A two-year time limit ignores how long it actually takes for families to stabilize financially, especially in high-cost housing markets. Families do not stop needing affordable housing after two years, particularly when wages have not kept pace with rent.”
- “This proposal would put more than 56,000 people in Washington, including over 28,000 children, at risk of losing housing assistance if implemented. The scale of that potential harm should not be ignored.”
- “In Washington, a full-time worker must earn \$41.11 per hour to afford a modest two-bedroom apartment, yet minimum wage is \$16.66. That means a worker would need to work nearly 100 hours per week to afford rent. Imposing time limits or work requirements in this context does not promote self-sufficiency. It guarantees that families will lose assistance despite working as much as they can.”
- “Housing assistance is what allows families to afford basic necessities like food, healthcare, and school supplies. Taking it away does not create opportunity. It creates crisis.”
- “Policies like this often result in people losing assistance not because they are ineligible, but because they cannot keep up with complex reporting requirements. That is not accountability; it is exclusion.”

Staff Member Example Comments

- “At Neighborhood House, I work with families who are doing everything they can to stay afloat: working, raising children, and trying to build stability. Housing assistance is often the single factor that allows them to remain employed. If they lose that support due to a time limit or rigid work requirement, they are far more likely to lose their job than gain stability.”
- “Many of the families I serve at Neighborhood House are already working in low-wage jobs. Even when they work full-time, their income is not enough to cover rent in Washington’s housing market. Work requirements do not address this fundamental mismatch. They simply create another barrier to maintaining housing.”
- “At Neighborhood House, we support clients in accessing healthcare and managing chronic conditions. When families lose housing, everything falls apart: appointments are missed, medications are lost, and preventable conditions become emergencies.”
- “At Neighborhood House, I regularly work with clients who are balancing employment with caregiving responsibilities. Some are caring for young children, others for aging parents or family members with health needs. A rigid hourly work requirement does not reflect the complexity of their lives.”
- “At Neighborhood House, I already see clients lose benefits due to paperwork challenges: missed deadlines, difficulty accessing documentation, or confusion about requirements. Adding more reporting requirements will increase the number of families who lose assistance for administrative reasons rather than true ineligibility.”
- “Some of the families we serve at Neighborhood House cannot safely speak out about how policies like this would affect them. They are afraid of stigma, judgment, or repercussions. As staff, we have a responsibility to speak to what we see: housing stability is the foundation for everything else we help them achieve.”
- “Our employment and adult education programs at Neighborhood House are designed to help clients build long-term economic stability. Housing instability directly undermines that work. It is extremely difficult to attend training, complete certifications, or maintain employment when you do not know where you will sleep.”

Leadership Example Comments

- “I am on the board of Neighborhood House, which serves over 13,000 community members annually. Our programs, from early childhood education to employment services, depend on families having stable housing. When housing is disrupted, participation drops, outcomes worsen, and the effectiveness of these programs is significantly diminished.”

- “This proposed rule does not address the root causes of housing instability. It does not increase wages, expand affordable housing, or create new opportunities. Instead, it creates mechanisms for families to lose assistance in an already unaffordable housing market.”
- “Neighborhood House serves many working families who rely on housing assistance precisely because they are working in low-wage jobs that do not cover rent. This rule would penalize them for structural conditions beyond their control.”
- “For over 120 years, Neighborhood House has worked to support families in achieving stability and opportunity. We know from experience that stability, not time limits, is what allows families to succeed.”

3. If Applicable, Elevate a Client’s Story

- “Many families in our community cannot safely share their stories. I want to lift up one example: a parent who works consistently but still cannot afford rent without assistance. They are doing everything right: working, raising their children, and trying to move forward but the math simply does not work. A time limit would not make them more self-sufficient; it would leave them without housing options.”

4. Optional Add-On

You can encourage commenters to end with:

- “HUD should focus on expanding access to rental assistance and addressing the shortage of affordable housing, rather than implementing policies that risk increasing housing instability.”