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Regulations Division
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th St. 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:

Catholic Charities USA (CCUSA) submits this comment in response to the Office of the Secretary, U.S. Department of Housing and Urban Development (HUD) Notice of Proposed Rulemaking (NPRM) entitled *Establishing Flexibility for Implementation of Work Requirements and Term Limits* (the proposed rule), published on March 2, 2026. Our organization is concerned that the proposed rule, instead of fostering self-sufficiency and addressing barriers to housing, may undermine self-sufficiency and increase instability by making housing conditional and temporary.

CCUSA is a national membership organization representing 169 independent Catholic Charities agencies and is one of the largest charitable networks in the country. These agencies operate more than 3,500 service locations across all 50 states, the District of Columbia, and five U.S. territories. Together, they assist individuals and families in times of need by providing food and nutrition support, emergency rental and utility assistance, rapid housing support and homelessness prevention services, mental health services, job skills training, employment support services, and a wide range of stabilization services. Last year alone, this diverse network of programs reached nearly 16 million people.

In Chapter 25 of the gospel according to Matthew, Christ calls us to witness to the poor with compassion and through acts of service and generosity. His teachings remind us that whatever we do for the least among us, we do for Christ. As Catholics, our commitment to serving those who are poor and vulnerable is rooted in the belief that every person deserves the opportunity to participate fully in society and to live with dignity. We do so through corporal acts of mercy and advocacy.

I. Overarching concerns with the proposed rule

Because of chronic underfunding, only one in four households that qualify receive any form of rental assistance.¹ The proposed rule would allow eligible public housing authorities (PHAs) and certain private and nonprofit Project-Based Rental Assistance owners (owners) to impose work requirements and time limits on certain households receiving federal rental assistance, creating ‘barriers to housing assistance that is already difficult to access and insufficient in a marketplace with limited alternatives. The additional barriers introduced by the proposed rule would subject PHAs, owners, assisted individuals and families, and organizations such as local Catholic Charities agencies to additional red tape and layers of cumbersome, costly bureaucracy.

We are concerned that the rule does not take into consideration that most people in HUD-assisted housing who can work, do. In fact, almost 75% of working-age, non-disabled households receiving assistance are attached to the workforce.² Those not in the workforce may be caring for children or disabled family members, seeking work, or enrolled in school or training.³ They may also be dealing with other, more complex factors, like chronic health problems, domestic violence, or reentry into the workforce after incarceration.⁴

Although the proposed rule includes certain exceptions for caretaking, education, age, and disability, the specific terms of the exceptions and their application would be left largely to owners and PHAs. The rule also does not include exceptions or flexibility for more complex or less easily quantified barriers to employment. Therefore, we urge you to either withdraw the rule or, at the very least, mandate a broader range of exceptions so that individuals and families in challenging situations are not subject to work requirements or time limitations. Further, we encourage HUD to include programmatic options that provide some reasonable accommodations to individuals and households that may lose housing assistance as a result of the implementation of work requirement and time limitation policies allowed by this rule.

II. Catholic teaching emphasizes the right to housing and the dignity of work

Our Catholic teaching tells us that housing is a right that must be available to all persons so they may lead a life that honors their inherent dignity.⁵ “[H]ousing constitutes a basic social good and

¹ Sonya Acosta & Eric Gartland, *To Better Meet Record Levels of Need, Keep Families Housed, Congress Must Increase 2025 Funding for Housing Assistance*, CENTER ON BUDGET AND POLICY PRIORITIES (Feb. 27, 2025), <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).

² Alicia Mazzara & Barbara Sard, *Chart Book: Employment and Earnings for Households Receiving Federal Rental Assistance*, CENTER ON BUDGET AND POLICY PRIORITIES (Feb. 5, 2018), <https://www.cbpp.org/research/chart-book-employment-and-earnings-for-households-receiving-federal-rental-assistance>.

³ *Id.*

⁴ *Id.*

⁵ Second Vatican Council, *Gaudium et Spes*, no. 26.

cannot simply be considered a market commodity.”⁶ As such, society has a responsibility to provide the conditions in which human life and dignity are not undermined but enhanced.⁷ Churches, community groups, the private sector, and government must work together to meet this responsibility and ensure a decent standard of living for our brothers and sisters. The rule, as written, does not recognize the inherent right to housing and instead makes this aid conditional, abandoning our shared responsibility for our communities and for those in need. Therefore, we recommend that the rule include reasonable alternatives to ensure that those deemed ineligible will still have access to safe, decent housing.

As Catholics, we believe that work is constitutive of the dignity of the human person; it allows a person to express not only his or her humanity but also his or her unique identity.⁸ In the Justification section of the NPRM, HUD states that “[t]he current HUD policy has disincentivized employment and economic self-sufficiency.”⁹ We value work and agree that federal policy should promote work – as well as fair wages and just conditions – so that individuals and families may realize integral human development and contribute to society. However, we are concerned that this rule, as written, does not support people eager to work; rather, by making housing conditional and temporary, it creates instability that undermines an individual’s ability to maintain steady employment and attain economic self-sufficiency.¹⁰ Undercutting an individual’s ability to maintain steady employment not only runs contrary to the stated purpose of this rule and the law that authorizes it, but also leads to more frequent transitions between housing support and crisis services, such as those provided by Catholic Charities agencies.

Poverty is the result of a variety of complex, interconnected factors; chief among them is a lack of safe, stable housing.¹¹ The federal government has long recognized its role in ensuring safe, stable housing for individuals and families. Most relevant to the proposed rule, and discussed in the NPRM, is the United States Housing Act. The Act was passed in 1937

[t]o promote the general welfare of the Nation by employing the funds and credit of the Nation, as provided in this chapter...to assist States and political subdivisions of States to remedy

⁶ Pontifical Commission “*Justicia et Pax*” under Pope John Paul II, *What Have You Done For Your Homeless Brother?*, no. 3.

⁷ Homelessness and Housing: A Human Tragedy, A Moral Challenge, A Statement Issued by the Administrative Board of the United States Catholic Conference, no. 5 (Mar. 24, 1988).

⁸ US CONFERENCE OF CATHOLIC BISHOPS, <https://www.usccb.org/beliefs-and-teachings/what-we-believe/catholic-social-teaching/the-dignity-of-work-and-the-rights-of-workers> (last visited Apr. 27, 2026).

⁹ 91 Fed. Reg. 10016, 10018.

¹⁰ Matthew Desmond & Carl Gershenson, *Housing and Employment Insecurity among the Working Poor*. SOCIAL PROBLEMS, vol. 63, no. 1, 2016, pp. 46–67. *JSTOR*, <http://www.jstor.org/stable/44014894>.

¹¹ UNITED STATES INTERAGENCY COUNCIL ON HOMELESSNESS, *The Importance of Housing Affordability and Stability for Preventing and Ending Homelessness* (May 2019), <https://www.usich.gov/sites/default/files/document/Housing-Affordability-and-Stability-Brief.pdf> (“For example, a body of evidence indicates that when people—both adults and children alike—experience housing instability or homelessness, their prospects for future educational attainment, employment growth, health stability, and family preservation are significantly reduced.”)

unsafe housing conditions and the acute shortage of decent and safe dwellings for low-income families...to assist States and political subdivisions of States to address the shortage of housing affordable to low-income families...and...to vest in public housing agencies that perform well, the maximum amount of responsibility and flexibility in program administration, with appropriate accountability to public housing residents, localities, and the general public[.]¹²

We are concerned that the proposed rule is in contradiction with the declaration of policy in the Act. The stated policy of the Act, which the rule is intended to implement, is not to incentivize employment. Rather, the stated policy of the Act is to assist states and localities so that they may adequately address the lack of “decent and safe dwellings for low-income families” in promotion of the general welfare of the Nation. Further, we are concerned that the proposed rule will not accomplish its stated objectives of promoting self-sufficiency of those in receipt of housing assistance and addressing the shortage of affordable housing.

- a. The proposed rule could potentially make it harder for assisted individuals to maintain employment

Pursuant to the proposed rule, each PHA and owner could develop their own policy requiring assisted “work-eligible” individuals to engage in work activities, and to establish term limits for non-elderly, non-disabled families.¹³ First, and perhaps most importantly, the proposed rule cannot accomplish its stated purpose of encouraging economic self-sufficiency because it injects instability into housing assistance by adding another layer of conditions and time limits through one-off policies devised by PHAs and owners. An individual or a family cannot be “self-sufficient” if they cannot maintain employment and they cannot maintain employment without stable housing. In fact, in one study researchers found that working renters who lose their housing are 11 to 22 percent more likely to lose their job.¹⁴ This same study found housing loss to be an “actuator” for job loss for individuals with both stable and unstable work histories.¹⁵

To help individuals maintain employment, we urge HUD to include provisions to address the underlying causes of housing instability, such as the availability of affordable housing, livable wages, and transportation. Individuals that receive housing assistance often have multiple low-paying jobs and struggle to secure affordable childcare. They may have a disability that doesn’t qualify for an exception, or the caregiver for a disabled family member that does not qualify for an exception. These are realities, not a lack of personal drive. Adding additional administrative requirements and withdrawing assistance at an arbitrary time will only serve to exacerbate housing instability, to the detriment of individuals, families, and communities.

¹² 42 U.S.C. § 1437(a)(1).

¹³ 91 Fed. Reg. 10016, 10021.

¹⁴ Matthew Desmond & Carl Gershenson, *Housing and Employment Insecurity among the Working Poor*. SOCIAL PROBLEMS, vol. 63, no. 1, 2016, pp. 46-67. JSTOR, <http://www.jstor.org/stable/44014894>.

¹⁵ *Id.* at 59.

- b. The proposed rule gives broad discretion to PHAs and owners, both nonprofit and private

The proposed rule will certainly create flexibility, but the flexibility it will create will likely lead to red tape that has the potential to further exacerbate housing instability and poverty, forcing those in need to more frequently rely on support services provided by organizations like Catholic Charities. The policies that PHAs and owners are allowed to implement, barring some limitations set by the proposed rule, are effectively fully within their discretion. For example, consistent with the proposed rule, PHAs and owners would be able “to limit the duration for which a student enrolled in an institution of higher education may be excluded” from the definition of work-eligible,¹⁶ whether the activity engaged in by an assisted individual met the work requirement,¹⁷ and how many hours per week the assisted individual would be required to work,¹⁸ among other aspects of the potential policies allowed pursuant to the proposed rule. Deciding what policies are consistent with the rule and implementing those policies could be arbitrary, burdensome and costly for PHAs and owners, while navigating the differences between various PHAs’ and owners’ policies will require Catholic Charities agencies and other nonprofits to take on the onerous task of working closely with clients to navigate new compliance policies. These additional layers of coordination will require additional time, staffing, and infrastructure, without additional funding.

Even beyond the problem of creating a complex patchwork of varying policies, the lack of available funding and oversight could foment arbitrary, capricious, and simply ineffective application of the policies implemented by PHAs and owners. The policy of the Act states that the government should vest in public agencies that perform well “the maximum amount of responsibility and flexibility in program administration, *with appropriate accountability to public housing residents, localities, and the general public*” (emphasis ours).¹⁹ Flexibility is called for but so is accountability to assisted individuals, state and local governments, and the public, and we note that the proposed rule does not include a mechanism to ensure this accountability.

III. Conclusion

Our Catholic teaching tells us that housing is a right that must be available to all persons so they may lead a life that honors their inherent dignity. While we value work and believe it is critical to integral human development, we are concerned that the proposed rule will create housing instability that will undercut assisted individuals’ ability to maintain employment. For these reasons, and as more fully set forth above, we oppose the proposed rule and urge HUD to reconsider it.

¹⁶ *Id.*

¹⁷ *Id.* at 10022.

¹⁸ *Id.*

¹⁹ 42 USC § 1437(a)(1)(C).



Respectfully submitted,

A handwritten signature in blue ink that reads "Brian Corbin".

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