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Nearly 3.7 Million People at Risk of Losing Needed Rental Assistance to Harsh Time Limit and Work Requirement Proposal

The Trump Administration has proposed a rule¹ under which as many as 3.7 million people, more than half of them children, would be at risk of losing their rental assistance to rigid time limits or stringent work requirements. Many of them could face eviction and homelessness as a result.

Everyone should have a safe, stable, affordable place to live. And in support of that, policymakers should work toward providing enough funding so that rental assistance reaches everyone who needs it. Rigid time limits and work requirements that take away assistance from people who need help affording housing would move us in the opposite direction.

Housing remains deeply unaffordable for millions of people at the same time that costs are rising for other essentials like groceries, electricity, and gas. This proposed rule is part of a broader set of proposals the Trump Administration is putting forward that would take away rental assistance from people who need it, make housing even harder to afford, and push more people into homelessness. These include proposed funding cuts, harmful changes to homelessness programs, and a plan to take assistance away from entire households if even one member is ineligible because of their immigration status – rather than providing such households with assistance for just the members who are eligible.²

FIGURE 1

Harsh Time Limits and Work Requirements Could Place Nearly 3.7 Million People at Risk of Losing Needed Rental Assistance

Number of people who would lose rental assistance under proposed two-year time limit and 40-hour-per-week work requirement



3.7 million
people



1.9 million
children



2.1 million
people in
working families

Source: CBPP analysis of 2024 HUD administrative data

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The proposed rule is legally dubious, for reasons we describe below. But if it goes into effect, it would allow policies that take away rental assistance from most working-age households if adults aren't able to meet a stringent and red tape-laden work requirement of up to 40 hours per adult per week or prove they are exempt, or if the household reaches a time limit on assistance as short as two years. State and local housing agencies could impose these policies in two of the largest rental assistance programs (Housing Choice Vouchers, except for some small voucher subprograms, and Public Housing), and private owners of subsidized housing developments could do so in a third major program (Project-Based Rental Assistance).

The rule says that people with disabilities and seniors would be largely exempt from the time limits and work requirements. And adults meeting certain other criteria, such as primary caregivers for a person with a disability or a young child under age 6, would also be exempt from work requirements. But experience with work requirements in other programs shows that even people who are exempt or are working the required number of hours often lost assistance due to burdensome red tape.³ Exemptions based on disability are particularly hard for people to prove, often requiring extensive documentation that stretched caseworkers – or, worse, private owners of subsidized housing – may be ill-equipped to evaluate accurately. And lack of access to health providers, particularly for people who are uninsured, can make obtaining the required documentation impossible. As a result, it is likely that many people with disabilities or who meet other exemption criteria would lose assistance under the policies permitted by the rule.

The rule makes these work requirements and time limits optional for owners and housing agencies, but perhaps only on paper. The Department of Housing and Urban Development (HUD) could pressure housing agencies and private owners to adopt them, including through illegal tactics like those the Trump Administration has used to impose its policy priorities and preferences in other areas.⁴ In addition, states could enact laws requiring work requirements and time limits. HUD has also proposed a legislative change to *require* agencies and owners to impose work requirements and time limits in these programs, though there is currently no indication that Congress will act on that proposal in the near term.

Millions Will Lose Assistance, Revealing Major Flaws in the Policy

Up to **3.7 million people**, including **1.9 million children**, could lose assistance under the two-year time limit and 40-hour-per-week work requirement the rule would allow, if their housing agency or the owner of their property adopts the policies. This includes **2.1 million people** in households that are already working but are either over the two-year time limit or not working enough hours to meet the work requirement.

Evidence from a range of economic and health security programs shows policies that take away assistance from people who can't meet a work requirement or who hit an arbitrary time limit are ineffective at helping people find jobs and achieve stability and self-sufficiency.⁵ Rigorous research shows that time limits on rental assistance cause more people to become homeless compared to ongoing

assistance.⁶ Imposing arbitrary time limits does nothing to tackle the root cause of housing instability that rental assistance addresses: the gap between housing costs and renters' incomes.

Work requirements in SNAP and Medicaid have been found to take away assistance people need without increasing employment or earnings.⁷ Such restrictions fail to address the underlying barriers to finding adequate employment, such as lack of access to affordable child care and transportation. The unusually stringent 40-hour work requirement that HUD's rule would permit would be nearly impossible for many workers to meet, since workers with low-paying jobs often have little control over their hours and only a small share are able to find jobs that guarantee 40 hours every week.⁸ Better ways to enable and support work exist, including expanding child care assistance, strengthening the Earned Income Tax Credit, and promoting paid family and medical leave.

Instead of taking rental assistance away from people based on rigid time limits and work requirements, policymakers should provide more resources to extend this effective assistance to everyone who needs it.

HUD is accepting public comments on the proposed rule through May 1, 2026.⁹ If a final rule substantially similar to the proposed rule goes into effect, it is expected to face legal challenges. It has been widely understood that HUD does not have the authority to allow work requirements and time limits, except at a limited number of agencies participating in a demonstration program.¹⁰ In fact, the first Trump Administration unsuccessfully sought a legislative change for the specific purpose of allowing state and local housing agencies and subsidized housing owners to impose work requirements.¹¹

Putting aside questions of legality, the rule's goals are misguided. Instead of taking rental assistance away from people based on rigid time limits and work requirements, policymakers should provide more resources to extend this effective assistance to everyone who needs it.¹²

TABLE 1

Estimated Number of People at Risk of Losing Rental Assistance Under Proposed 2-Year Time Limit and 40-Hour-per-Week Work Requirement

All Households			Working Households*
State or Territory	People	Children	People
Alabama	91,000	50,600	49,000
Alaska	3,200	1,700	2,200
Arizona	42,300	23,000	24,000
Arkansas	36,200	19,400	18,200
California	317,100	143,300	194,900
Colorado	48,300	25,200	27,500
Connecticut	61,300	27,900	38,600
Delaware	11,100	6,000	7,000
District of Columbia	9,200	4,400	3,900
Florida	188,100	100,800	110,000
Georgia	118,100	64,800	61,600
Hawai'i	20,200	10,300	15,800
Idaho	6,700	3,800	4,400
Illinois	100,800	50,000	53,800
Indiana	62,700	33,700	29,900
Iowa	23,200	12,600	13,000
Kansas	17,900	9,400	9,700
Kentucky	46,700	23,500	23,300
Louisiana	93,700	50,100	49,600
Maine	11,700	5,800	6,900
Maryland	58,500	28,800	35,400
Massachusetts	110,200	49,500	74,200
Michigan	103,000	56,400	50,400
Minnesota	62,700	33,600	41,900
Mississippi	65,500	35,800	33,000
Missouri	70,900	38,600	35,800
Montana	7,800	4,000	4,700
Nebraska	15,700	8,400	9,600
Nevada	23,000	12,400	12,400
New Hampshire	5,900	3,100	4,000
New Jersey	132,500	61,700	88,500
New Mexico	18,600	9,800	10,700
New York	438,900	187,800	302,800
North Carolina	103,200	57,000	54,000
North Dakota	6,900	3,500	3,800
Ohio	185,500	99,200	82,400
Oklahoma	44,200	24,100	19,700

TABLE 1

Estimated Number of People at Risk of Losing Rental Assistance Under Proposed 2-Year Time Limit and 40-Hour-per-Week Work Requirement

All Households			Working Households*
State or Territory	People	Children	People
Oregon	17,300	9,000	9,500
Pennsylvania	108,400	56,500	58,500
Rhode Island	20,700	9,800	13,100
South Carolina	55,900	31,300	28,300
South Dakota	8,000	4,300	4,400
Tennessee	92,600	50,800	42,300
Texas	266,200	147,000	157,700
Utah	7,700	4,200	4,700
Vermont	7,600	4,000	4,300
Virginia	93,300	48,600	54,100
Washington	24,300	12,700	13,800
West Virginia	19,700	9,000	10,200
Wisconsin	43,300	23,300	24,300
Wyoming	2,700	1,400	1,500
Guam	10,400	6,000	7,900
Northern Mariana Islands	1,800	1,000	700
Puerto Rico	131,700	56,900	51,700
U.S. Virgin Islands	6,300	3,200	3,900
Total U.S.	3,680,200	1,859,100	2,097,500

* Working Households = households with at least one member reporting wage income

Note: Figures are rounded to the nearest hundred and may not sum to totals due to rounding. For more details on how we produced these estimates, see the “Sources and Methodology” section in the technical appendix.

Source: CBPP analysis of 2024 HUD administrative data

Technical Appendix

Sources and Methodology

CBPP used 2024 HUD administrative data to estimate the number of people who could lose rental assistance under the two-year time limit and 40-hour-per-adult-per-week work requirement allowed under the HUD proposed rule.

Programs: Our analysis includes households in the programs where property owners or public housing agencies (PHAs) would be allowed to impose time limits or work requirements under HUD’s rule: Project-

Based Rental Assistance (PBRA), Public Housing, and Housing Choice Vouchers, including both tenant-based and project-based vouchers but excluding households receiving HUD-Veterans Affairs Supportive Housing vouchers. In addition, we exclude vouchers and public housing units administered by PHAs participating in the Moving to Work Demonstration, which are already permitted to implement time limits and work requirements. Due to data limitations, we are unable to exclude a small number of households receiving vouchers from programs targeting former foster youth, which would be exempt from time limits.

Exemptions: Our analysis excludes households where the head or spouse is a senior (age 62 or older) or a person who is identified in HUD's data as having a disability, since those households are exempt from HUD's proposed time limits and seniors and people with disabilities are exempt from the proposed work requirements. To further narrow down exemptions, we begin by taking all people living in the household who are ages 18 to 61 and do not have a disability; this group is assumed to be potentially subject to the work requirement. On subsequent reference we will define this group as "work-able" adults, though many face barriers that would make it difficult for them to work the required number of hours, some of which we outline above. In addition, some may have disabilities but have not been able to submit sufficient documentation to their PHA or owner for them to be identified as a person with a disability in HUD's data. HUD's proposal requires that work requirements exempt primary caretakers of a person with a disability or a young child under age 6, so our work requirement analysis excludes people if they are a single work-able adult in a household that includes a young child or a person with a disability. Due to data limitations, we are unable to exclude other groups exempt from work requirements, including participants who are pregnant, caretakers of temporarily incapacitated individuals, or students enrolled in an institution of higher education (who would be exempt, but only for a period of time specified by the property owner or PHA).

Time Limits: Length of stay was determined by calculating the total months between the household's admission date into the rental assistance program and January 1, 2025. Households with a length of stay over two years are counted as at risk of losing rental assistance. Under the proposed rule, voucher time limits could count months of assistance received before a time limit policy goes into effect, while PBRA and Public Housing time limits can only count months after the policy's effective date. It is unclear if this difference is intentional or whether HUD will modify the requirements to be consistent across programs in the final rule. If the time limits only count months after the policy goes into effect, the numbers in our analysis reflect estimates of the number of households who could lose assistance once a time limit has been in effect for two years.

Work Requirements: HUD administrative data includes the 2024 wage income of household members but does not include the number of hours worked. We estimated the hours worked at the state minimum wage for each work-able adult in a household based on 2024 minimum wage data from the Bureau of Labor Statistics.¹³ Households with at least one work-able, non-exempt adult working less than 40 hours per week are counted as at risk of losing rental assistance. This is a low-end estimate of the number of households at risk of losing assistance due to work requirements, since many workers earn wages above the minimum and therefore work fewer hours than our estimates assume.

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- ¹ Establishing Flexibility for Implementation of Work Requirements and Term Limits, 91 Fed. Reg. 10016 (2026), <https://www.federalregister.gov/documents/2026/03/02/2026-04095/establishing-flexibility-for-implementation-of-work-requirements-and-term-limits>.
- ² Sonya Acosta, “Congress Must Act to Prevent Cuts That Would Leave Hundreds of Thousands at High Risk of Homelessness,” CBPP, December 17, 2025, <https://www.cbpp.org/blog/congress-must-act-to-prevent-cuts-that-would-leave-hundreds-of-thousands-at-high-risk-of>; Anna Bailey, “Trump Policies Would Worsen Homelessness, Attack Basic Freedoms of People Who Can’t Afford Rent,” CBPP, April 8, 2026, <https://www.cbpp.org/research/housing/trump-policies-would-worsen-homelessness-attack-basic-freedoms-of-people-who-cant>; Erik Gartland and Sonya Acosta, “Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers,” CBPP, December 12, 2025, <https://www.cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create>.
- ³ Jennifer Wagner and Jessica Schubel, “States’ Experiences Confirm Harmful Effects of Medicaid Work Requirements,” CBPP, updated November 18, 2020, <https://www.cbpp.org/health/commentary-as-predicted-arkansas-medicaid-waiver-is-taking-coverage-away-from-eligible-people>.
- ⁴ Devin O’Connor and Joe Carlile, “Trump Administration Abused Spending Safeguards to Advance Its Agenda – and Illegally Hid Its Actions,” CBPP, September 5, 2025, <https://www.cbpp.org/research/federal-budget/trump-administration-abused-spending-safeguards-to-advance-its-agenda-and>.
- ⁵ Claudia Aiken and Ellie Lochhead, “Policy at a crossroads: What we know about work requirements and time limits in federal housing assistance,” Housing Solutions Lab, September 3, 2025, <https://www.localhousingolutions.org/policy-insights/policy-insights-work-requirements-and-time-limits-in-federal-housing-assistance/>.
- ⁶ 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,” CBPP, July 18, 2025, <https://www.cbpp.org/research/housing/rental-assistance-time-limits-would-place-more-than-3-million-people-half-of-them>.
- ⁷ Hiren Nisar, Maxwell Matite, and Lan Hu, “A Review of Work Requirement Policies in HUD-Funded Assisted Housing: Final Research Report,” 2M Research, April 5, 2024, <https://www.huduser.gov/portal/publications/A-Review-of-Work-Requirement-Policies-in-HUD-Funded-Assisted-Housing.html>.
- ⁸ Lauren Bauer, Chloe East, and Olivia Howard, “Low-income workers experience – by far – the most earnings and work hours instability,” Brookings Institution, January 9, 2025, <https://www.brookings.edu/articles/low-income-workers-experience-by-far-the-most-earnings-and-work-hours-instability/>; Elizabeth Ananat, Anna Gassman-Pines, and Olivia Howard, “Work requirements penalize workers in volatile occupations,” Brookings Institution, May 22, 2025, <https://www.brookings.edu/articles/work-requirements-penalize-workers-in-volatile-occupations/>.
- ⁹ Comments can be submitted at: <https://www.regulations.gov/document/HUD-2026-0298-0001/comment>.
- ¹⁰ CBPP, Moving to Work, <https://www.cbpp.org/research/resource-lists/moving-to-work>.
- ¹¹ Will Fischer, “Housing Work Requirements Would Harm Families, Including Many Workers,” CBPP, updated May 3, 2018, <https://www.cbpp.org/research/housing/housing-work-requirements-would-harm-families-including-many-workers>.
- ¹² CBPP, Making Housing Affordable for All, <https://www.cbpp.org/research/topics/making-housing-affordable-for-all>.
- ¹³ U.S. Department of Labor, “Changes in Basic Minimum Wages in Non-Farm Employment Under State Law: Selected Years 1968 to 2024,” <https://www.dol.gov/agencies/whd/state/minimum-wage/history>.