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Housing Work Requirements Would Harm Families, Including Many Workers

By Will Fischer

A Trump Administration plan to allow work requirements in federal rental assistance would put low-income people, including many who now work, at risk of hardship, while doing little to support work. Under the plan — outlined in the President’s 2019 budget and detailed in a legislative proposal released in April — state and local housing agencies administering Housing Choice Vouchers and Public Housing and owners of Project-Based Rental Assistance properties could evict or end subsidies for households that include non-elderly adults without disabilities, if they don’t work or participate in “employment-related activities” for a specified number of hours set by agencies and owners, up to a limit established by the Department of Housing and Urban Development (HUD). Today such requirements are permitted only at a small number of agencies under a demonstration.¹

Increasing earnings and employment among rental assistance recipients is an important goal, but the Administration’s plan offers a deeply flawed approach to advancing it, for the following reasons:

- **Work requirements aren’t an effective way to encourage or support work.** Research shows that work requirements in other programs have generated little or no long-term increase in earnings and employment and have caused many families — often those with the greatest disadvantages — to lose assistance.²
- **Work requirements would push families into homelessness and hardship.** Most families with rental assistance would have great difficulty affording market rents without help. As a result, those that are cut off could be forced into unstable, overcrowded housing or homelessness, inflicting serious hardship and making it *harder* for them to find or keep a job.
- **Many of those harmed would be people who already work.** Most rental assistance recipients who can work do,³ but low-wage workers often have unpredictable hours, ranging from 40 hours in some weeks to just a fraction of that amount in others. Workers doing their best to earn a living could lose assistance because their employers don’t give them enough hours or they can’t keep up with the paperwork to prove the hours they worked each week.
- **People with health conditions that limit their ability to work could lose assistance.** Many rental assistance recipients have health conditions that make it difficult for them to work but don’t meet the Department of Housing and Urban Development’s (HUD) limited definition of disability. Under the Administration’s plan, these recipients could lose assistance if they can’t work the required hours. HUD could allow housing agencies and owners to exempt people with work-limiting health conditions, but agencies and owners usually won’t

have the administrative resources to identify those recipients effectively and many people won't be able to navigate the maze of paperwork likely needed to prove they qualify.

- **The plan wouldn't help families overcome barriers to work.** Many rental assistance recipients seeking work would not have access to training to prepare them for available jobs, transportation to job sites, or subsidies to help care for children or for family members who are ill or have disabilities.
- **Local agencies could be forced to impose "optional" work requirements.** The Administration presents its plan as an option for local agencies, but once federal law permits work requirements, state legislatures could direct local agencies to impose them and HUD could pressure them to do so, even if local housing agencies don't have the resources to provide training or supports.
- **Promising HUD programs offer a better way to promote work.** Policymakers who want to help rental assistance recipients succeed should focus on strengthening two HUD initiatives (Jobs Plus and Family Self-Sufficiency) that use service coordination and incentives to support work and have shown promising results without the risks of punitive work requirements.⁴ In addition, HUD should improve implementation of "Section 3," an existing requirement that a portion of jobs and small business opportunities created through federal housing and community development investments go to public housing residents and other low-income people.⁵

¹ Will Fischer, "New Report Reinforces Concerns About HUD's Moving to Work Demonstration," Center on Budget and Policy Priorities, October 30, 2017, <https://www.cbpp.org/research/housing/new-report-reinforces-concerns-about-huds-moving-to-work-demonstration>.

² LaDonna Pavetti, "Work Requirements Don't Cut Poverty, Evidence Shows," Center on Budget and Policy Priorities, updated June 7, 2016, <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>.

³ Alicia Mazzara and Barbara Sard, "Chart Book: Employment and Earnings for Households Receiving Federal Rental Assistance," Center on Budget and Policy Priorities, February 5, 2018, <https://www.cbpp.org/research/housing/chart-book-employment-and-earnings-for-households-receiving-federal-rental>.

⁴ James A. Riccio, "Sustained Earnings Gains for Residents in a Public Housing Jobs Program: Seven-Year Findings from the Jobs-Plus Demonstrations," MDRC, January 2010, <https://www.mdrc.org/publication/sustained-earnings-gains-residents-public-housing-jobs-program>; Judy Geyer *et al.*, "Evaluation of the Compass Family Self-Sufficiency (FSS) Programs Administered in Partnership with Public Housing Agencies in Lynn and Cambridge, Massachusetts," Abt Associates, September 2017, <http://abtassociates.com/AbtAssociates/files/3c/3c791568-51a4-4934-9d99-0c9cef7fdbb9.pdf>.

⁵ HUD's website gathers materials about Section 3 policies to promote economic opportunity at https://www.hud.gov/program_offices/fair_housing_equal_opp/section3/section3.