



801 Albany Street
2nd Floor
Boston, MA 02119

Phone: 617.414.6366
Fax: 617.414.7915
www.childrenshealthwatch.org

Submitted via www.regulations.gov

Office of General Counsel, Rules Docket Clerk
Department of Housing and Urban Development
451 7th 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

Regulations Division, Office of General Counsel, U.S. Department of Housing and Urban-Development:

Thank you for the opportunity to submit comments regarding the Department of Housing and Urban Development (HUD) proposed rule "Establishing Flexibility for Implementation of Work Requirements and Term Limits," published in the Federal Register on March 2, 2026 (FR-6520-P-01). As pediatricians and public health researchers, we understand firsthand that safe, affordable, stable housing is essential to support children and their parents. This proposed rule would undermine the health and development of young children by increasing rates of eviction and homelessness even among eligible families, ultimately contributing to housing and economic instability while generating substantial and avoidable public health costs. **On behalf of Children's HealthWatch, we write in strong opposition and urge HUD to withdraw the rule in its entirety.**

Children's HealthWatch is a nonpartisan network of pediatricians, public health researchers, and policy experts who examine how policy decisions affect the health and well-being of young children and their families. We accomplish this by interviewing caregivers of young children under age four in emergency departments and primary care clinics in four U.S. cities: Boston, MA; Minneapolis, MN; Little Rock, AR; and Philadelphia, PA. Since 1998, we have interviewed more than 80,000 caregivers and analyzed those data to determine the impact of policy decisions on the health and development of young children.

A large body of evidence consistently demonstrates the importance of safe and stable housing for child health.¹ Housing is foundational for young children, who are at a critical

¹ Taylor, L. Housing And Health: An Overview Of The Literature. *Health Affairs* Health Policy Brief. June 2018. 10.1377/hpb20180313.396577

point in growth and development. The proposed rule would allow Public Housing Agencies (PHA) and Project-Based Rental Assistance (PBRA) owners to limit the amount of time families are eligible for housing assistance. If a family cannot comply with reporting requirements that consistently demonstrate that all “work-eligible adults” in the household are working or looking for work for 40 hours a week, they may face a loss of assistance or even eviction. The Center on Budget and Policy Priorities estimates that up to 3.7 million people, including 1.9 million children, could lose housing assistance under this rule.² This is an untenable and health-harming choice.

The Proposed Rule Will Increase Housing and Economic Instability for Families with Children

This NPRM would allow a PHA or PBRA to revoke housing assistance or evict an entire family, including children, if just one adult member failed to meet the work reporting requirement. This is not hypothetical: the Arkansas statute HUD cites as a model explicitly calls for terminating assistance for any household with an able-bodied adult who is unable to meet a 20-hour per week work reporting requirement.^{3,4} The NPRM goes even further than the Arkansas policy and allows harsher requirements, at 40 hours per week per eligible adult.

Evidence from several health and safety net programs, including the Temporary Assistance for Needy Families (TANF) program, demonstrates that more stringent reporting requirements do not increase employment but rather reduce program participation among eligible households.⁵ While cash assistance caseloads have fallen from 4.4 million families in 1996 to under one million today, research shows the majority of this decline is attributable to policy-imposed barriers like work requirements and time limits.^{6,7} Families are prevented from accessing the assistance they’re eligible for,

² Gartland, E. Nearly 3.7 Million People at Risk of Losing Needed Rental Assistance to Harsh Time Limit and Work Requirement Proposal. *Center on Budget and Policy Priorities*. April 2026. <https://www.cbpp.org/research/housing/nearly-37-million-people-at-risk-of-losing-needed-rental-assistance-to-harsh-time-limit-and-work-requirement-proposal>

³ Department of Housing and Urban Development. NPRM on Establishing Flexibility for Implementation of Work Requirements and Term Limits. 91 FR 10016. March 2026. <https://www.federalregister.gov/d/2026-04095/p-55>

⁴ Arkansas HB 1196 of 2023. <https://arkleg.state.ar.us/Home/FTPDocument?path=%2FBills%2F2023R%2FPublic%2FHB1196.pdf>

⁵ Shu-Huah Wang, J. State TANF Time Limit and Work Sanction Stringencies and Long-Term Trajectories of Welfare Use, Labor Supply, and Income. *Journal of Family and Economic Issues*. October 2020. <https://link.springer.com/article/10.1007/s10834-020-09714-8>.

⁶ Lower-Basch, E. and Burnside, A. TANF 101: Cash Assistance. *CLASP*. July 2022. <https://www.clasp.org/publications/report/brief/tanf-101-cash-assistance/>.

⁷ Parolin, Z. Decomposing the Decline of Cash Assistance in the United States, 1993 to 2016. *Demography*, vol. 58, no. 3, pp. 1119-1141. April 2021. <https://doi.org/10.1215/00703370-9157471>

resulting in real harms to their health: declining cash assistance coverage between 2001 and 2015 was directly associated with increases in household food insecurity and homeless children in public schools, with the strongest effects among single mothers living alone with their children.⁸ Loss of benefits without income gains from employment pushes families into deep poverty and hardship.⁹

This rule would put an estimated 3.7 million people, including 1.9 million children, at risk of losing housing assistance. This loss of assistance could lead to eviction or homelessness among families with children.¹⁰ Even though the NPRM exempts primary caretakers of children under age six from work reporting requirements, many children live in households with more than one adult. If the secondary parent or another adult in the household cannot meet the 40 hour work reporting requirements, the entire family - including the exempt parent and child - may lose housing assistance, resulting in de facto evictions. These evictions punish children for things out of their control and contribute to housing instability, which has both immediate and long-term consequences for the health and development of young children.

Our research at Children's HealthWatch shows that young children in unstably housed families, including families falling behind on rent, moving multiple times, and/or experiencing homelessness are 41% more likely to be in fair or poor health, 19% more likely to have been hospitalized, and 28% more likely to be at risk for developmental delays.^{11, 12, 13} Families who experience cost-driven moves, like having to move after losing their housing assistance, are also more likely to experience disrupted access to other social safety net programs, including the Supplemental Nutrition Assistance Program (SNAP) and Medicaid, which further harms children's physical, mental, and

⁸ Shaefer, L., Edin, K., Fusaro, V., and Wu, P. The Decline of Cash Assistance and the Well-Being of Poor Households with Children. *Social Forces* 98(3):1000–1025. 2019. <https://doi.org/10.1093/sf/soz020>

⁹ Shaefer, L., et al. The Decline of Cash Assistance and the Well-Being of Poor Households with Children. 2019.

¹⁰ Fischer, W. and Gartland, E. 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*. July 2025. <https://www.cbpp.org/research/housing/rental-assistance-time-limits-would-place-more-than-3-million-people-half-of-them>

¹¹ Sandel, M., Sheward, R., Ettinger de Cuba, S., Coleman, S., Frank, D., Chilton, M., Black, M., Heeren, T., Pasquariello, J., Casey, P., Ochoa, E., Cutts, D. Unstable Housing and Caregiver and Child Health in Renter Families. *Pediatrics*. 141 (2): e20172199. February 2018. 10.1542/peds.2017-2199

¹² Parker, M.G., Ettinger de Cuba, S., Rateau, L.J., Shea, M., Sandel, M., Frank, D., Cutts, D., Heeren, T., Lê-Scherban, F., Black, M., Ochoa Jr, E., Rose-Jacobs, R., Garg, A. Associations of household unmet basic needs and health outcomes among very low birth weight children. *J Perinatol* 43, 364–370. February 2023. <https://doi.org/10.1038/s41372-023-01626-3>

¹³ Sandel M., Sheward R., Ettinger de Cuba S., Coleman, S., Frank, D., Chilton, M., Black, M., Heeren, T., Pasquariello, J., Casey, P., Ochoa, E., Cutts, D. Unstable Housing and Caregiver and Child Health in Renter Families. *Pediatrics*. February 2018. 2018;141(2):e20172199

economic health.¹⁴ As rent consumes a greater share of income after losing assistance, families are forced to make difficult tradeoffs between basic needs, including food, transportation, and health care.¹⁵

Eviction Harms Health and Development and Incurs Avoidable Costs

Eviction disrupts every aspect of a family's life at once — employment, children's schooling, health care, and food security. Research consistently links eviction to worse health outcomes¹⁶ and lasting harm to children's academic achievement and earnings in adulthood.¹⁷ Children in families with a history of eviction are more likely to be in fair or poor health and at risk of developmental delays than children in families without a history of eviction.¹⁸ Their caregivers are more likely to report depressive symptoms and be in poor health, and their families are more likely to experience multiple economic hardships, like difficulty affording enough food or paying for needed health care.¹⁹

Unstable housing has wider effects beyond the immediate family - children are more likely to have behavioral problems and to struggle in school.²⁰ Housing instability is directly related to increased likelihood of mental health problems in children,²¹ decreases in student retention rates, and increases in school turnover, truancy, and

¹⁴ Leifheit, K., Schwartz, L., Pollack, E., Althoff, K., Lê-Scherban, F., Black, M., Jennings, J. Moving Because of Unaffordable Housing and Disrupted Social Safety Net Access Among Children. *Pediatrics*. 153 (3): e2023061934. March 2024. [10.1542/peds.2023-061934](https://doi.org/10.1542/peds.2023-061934)

¹⁵ Frank, D., Casey, P., Black, M., Rose-Jacobs, R., Chilton, M., Cutts, D., March, E., Heeren, T., Coleman, S., Ettinger de Cuba, S., & Cook, J. T. Cumulative Hardship and Wellness of Low-Income, Young Children: Multisite Surveillance Study - Children's HealthWatch. *Children's HealthWatch*. April 2010. <https://childrenshealthwatch.org/cumulative-hardship-and-wellness-of-low-income-young-children-multisite-surveillance-study/>

¹⁶ Himmelstein, G. and Desmond, M. Eviction And Health: A Vicious Cycle Exacerbated By A Pandemic. *Health Affairs*. April 2021. <https://www.healthaffairs.org/doi/10.1377/hpb20210315.747908/full/>.

¹⁷ Collinson, R., Dutz, D., Humphries, J. E., Mader, N., Tannenbaum, D., van Dijk, W. The Effects of Eviction on Children." Working Paper No. 33659. *National Bureau of Economic Research*. April 2025. <https://doi.org/10.3386/w33659>

¹⁸ Bruce, C., Bovell-Ammon, A., Ettinger de Cuba, S., Sheward R., Frank, D., Sandel, M. Eviction: A Preventable Cause of Adverse Child and Family Health. *Children's HealthWatch*. September 2021. <https://childrenshealthwatch.org/wp-content/uploads/Evictions-and-health-brief-v3.pdf>

¹⁹ Cutts, D., Ettinger de Cuba, S., Bovell-Ammon, A., Wellington, C., Coleman, S., Frank, D., Black, M., Ochoa, E., Chilton, M., Lê-Scherban, F., Heeren, T., Rateau, L. J., Sandel, M. Eviction and Household Health and Hardships in Families With Very Young Children. *Pediatrics*, 150(4). September 2022. <https://doi.org/10.1542/peds.2022-056692>

²⁰ Housing Instability is Linked to Adverse Childhood Behavior. *How Housing Matters*. May 2019. <https://howhousingmatters.org/articles/housing-instability-linked-adverse-childhood-behavior/>.

²¹ Fischer, W. Research Shows Housing Vouchers Reduce Hardship and Provide Platform for Long-Term Gains Among Children. *Center on Budget and Policy Priorities*. October 2015. <https://www.cbpp.org/research/research-shows-housing-vouchers-reduce-hardship-and-provide-platform-for-longterm-gains>; see also Giannarelli, L., Lippold, K., Minton, S., Wheaton, L. Reducing Child Poverty in the U.S.: Costs and Impacts of Policies Proposed by the Children's Defense Fund. *Children's Defense Fund*. January 2015. <https://www.childrensdefense.org/wp-content/uploads/2023/08/ReducingChildPovertyintheUSCostsandImpactsofPoliciesProposedbytheChildrensDefenseFund.pdf>

expulsions, limiting students' educational opportunities.²² Poor performance in school ultimately leads to lower wages in adulthood, contributing to financial instability. Simply put, when children are stably housed, they do better in school and ultimately get better jobs, increasing their physical, mental, and financial health.

Economic and housing instability impedes children's health and cognitive development, leading to poorer life outcomes as adults and also incurring avoidable expenditures by local, state, and federal governments.²³ In 2017, Children's HealthWatch estimated that housing instability among families with children would cost the U.S. \$111 billion in avoidable health and education costs over 10 years - a figure now likely higher due to inflation.²⁴ These costs include hospitalizations, mental health services for mothers, and special education for children, and ultimately drive prices up for everyone.

The NPRM will also impose new administrative burdens on PHA and PBRA owners, who will be tasked with verifying that each of their tenants are meeting the 40 hour work requirements and terminating housing assistance or carrying out evictions every two years. These processes are lengthy, and can incur costs onto the PHA and PBRA owners in addition to the lost income from rent. The income provided by vouchers are dependable, and abruptly terminating certain households' assistance may dissuade private property owners from participating in HUD programs, further limiting housing choice for low-income families.

This Rule Will Harm Working Families

Workers in low-wage jobs face particular risk from work reporting requirements. Research consistently documents that retail, food service, and other low-wage jobs involve highly variable and unpredictable hours - often shifting by 10 or more hours per

²² Cunningham, M. and MacDonald, G. Housing as a Platform for Improving Education Outcomes among Low-Income Children. *Urban Institute*. May 2012.
https://www.researchgate.net/profile/Heather_Schwartz/publication/267687704_Housing_as_a_Platform_for_Improving_Education_Outcomes_among_Low-Income_Children/links/54662110cf25b85d17f58d7/Housing-as-a-Platform-for-Improving-Education-Outcomes-among-Low-Income-Children.pdf.

²³ Sandstrom, H. and Huerta, S. The Negative Effects of Instability on Child Development: A Research Synthesis. *Urban Institute*. September 2013.
<https://www.urban.org/sites/default/files/publication/32706/412899-The-Negative-Effects-of-Instability-on-Child-Development-A-Research-Synthesis.PDF>.

²⁴ Poblacion, A., Bovell-Ammon, A., Sheward, R., Sandel, M., Ettinger de Cuba, S., Cutts, D., Cook, J. Stable Homes Make Healthy Families. *Children's HealthWatch*. July 2017.
<https://childrenshealthwatch.org/wp-content/uploads/CHW-Stable-Homes-2-pager-web.pdf>

week.²⁵²⁶ Placing a hard time limit on housing assistance ignores the realities of employment for families with low incomes.

Of the 3.3 million people at risk of losing their housing assistance, about 2 million are in families where at least one adult already has a job.²⁷ Most of these families would not be able to afford rent if their housing assistance was terminated and would face eviction, homelessness, and housing instability. In turn, the workers in these families would miss shifts and possibly lose their jobs as they struggle to relocate their belongings and care for their children in the midst of displacement. Without a stable place to call home, mental and physical health suffers and it becomes harder to hold down a job, reducing household income and ultimately leaving families in an even more precarious situation.

Fewer than 1 in 4 eligible households receive the rental assistance they need.²⁸ Imposing time limits would not shorten waitlists or reduce the amount of people needing assistance; instead, it would merely shift the need for assistance from household to household and result in unstable housing for all. The time limits will not benefit working families, PHA/PBRA owners, or the economy. They will take vital housing assistance away from working families, leading to housing instability, further employment barriers, and administrative burden.

Conclusion

Children's HealthWatch research consistently shows that safe, stable, and affordable housing is foundational to child health. When families cannot meet basic needs such as housing, the consequences are immediate and long-lasting. Allowing PHA and PBRA owners to impose work reporting requirements on their tenants will only result in children and families losing their housing, which will harm their mental, physical, and financial health.

²⁵ Bauer, L., East, C., Howard, O. Low-Income Workers Experience—by Far—the Most Earnings and Work Hours Instability. *Brookings Institute*. January 2025.
<https://www.brookings.edu/articles/low-income-workers-experience-by-far-the-most-earnings-and-work-hours-instability/>

²⁶ Karpman, M., Hahn, H., Gangopadhyaya, A. Precarious Work Schedules Could Jeopardize Access to Safety Net Programs Targeted by Work Requirements. *Urban Institute*. June 2019.
https://www.urban.org/sites/default/files/publication/100352/precarius_work_schedules_could jeopardize_access_to_safety_net_programs_1.pdf

²⁷ Fischer, W. Rental Assistance Time Limits Would Place More Than 3 Million People — Half of Them Children — at Risk of Eviction and Homelessness. July 2025.

²⁸ Three in Four Low-Income At-Risk Renters Do Not Receive Federal Rental Assistance. *Center on Budget and Policy Priorities*. Updated July 2021.
<https://www.cbpp.org/research/housing/three-out-of-four-low-income-at-risk-renters-do-not-receive-federal-rental-assistance>.



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Public housing provides one crucial source of affordable homes to 1.6 million low-income people in America,²⁹ and the evidence is clear that affordable housing supports health.³⁰ Rescinding access to housing assistance for families goes against HUD's mission to create strong, sustainable, inclusive communities and quality affordable homes for all. **For the health and future of our nation's children, we urge HUD to immediately withdraw this proposal.**

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephanie Ettinger de Cuba", with a long horizontal flourish extending to the right.

Stephanie Ettinger de Cuba, PhD, MPH
Executive Director, Children's HealthWatch

²⁹ Policy Basics: Public Housing. *Center on Budget & Policy Priorities*. September 2024, <https://www.cbpp.org/research/policy-basics-public-housing>.

³⁰ Maqbool, N., Viveiros, J., Ault, M. The Impacts of Affordable Housing on Health: A Research Summary. *Center for Housing Policy*. April 2015. <https://www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf>.