

## FACT SHEET

# HUD's Proposal on Work Requirements and Time Limits Would Take Away Housing Assistance From Older Adults

MARCH 30, 2026

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The U.S. Department of Housing and Urban Development (HUD) has released a [harmful proposed rule on allowing work requirements and time limits in HUD housing assistance programs](#). **This proposal would take away housing assistance from older adults.**

[Studies of work requirements in other public benefit programs](#), such as Medicaid and SNAP food assistance, show that 1) most people who are able to work, do work; 2) work requirements fail to improve employment outcomes; and 3) [many people, including older adults, lose assistance as a result of unnecessary red tape](#) and administrative barriers.

Unlike Medicaid and SNAP, however, [federal rental assistance](#) is not an entitlement program in which everyone who is eligible can receive assistance. As a result, the consequences of taking away HUD housing assistance are especially severe. **Federal rental assistance is scarce – if older adults lose their housing assistance, they may never get it again even if they reapply.** [People usually wait years](#) or over a decade for assistance, if they can even get off a waitlist at all.

## Key Aspects of Proposed HUD Rule

- Would allow Public Housing Authorities (PHAs) and HUD-assisted property owners to impose work requirements and/or time limits for receiving housing assistance.

- PHAs and owners could impose work requirements of up to 40 hours per week and time limits as short as two years.
- PHAs and owners would have wide discretion in designing and implementing these restrictions, including when to terminate assistance.
- Covered programs include all major HUD housing assistance programs: Public Housing, Housing Choice Vouchers, Project-Based Vouchers, and Project-Based Rental Assistance.
- Older adults age 62 and over, people with disabilities (as defined under 24 CFR § 5.403), and primary caretakers of people with disabilities (as well as some other limited groups) would be exempt from work requirements.
- Households headed by an older adult age 62+ or someone with a disability would be exempt from time limits.

## How HUD's Proposal Harms Older Adults

### Exemptions will not prevent older adults age 62+ and people with disabilities from losing housing assistance:

- More red tape will compound [administrative burdens that are already difficult for older adults and people with disabilities to navigate](#). These groups tend to face issues such as mobility or cognitive impairments that make it harder to keep up with paperwork.
- Due to [recent massive cuts to Medicaid](#), more tenants will lack access to the health care and documentation they need to prove they meet disability exemptions.
- Some older adults age 62+ and people with disabilities may live with others who are subject to work requirements, and/or live in households headed by a younger, non-disabled adult and subject to time limits. Termination of housing assistance generally affects an entire household. Older and disabled adults could therefore lose their assistance if a PHA/owner finds a family member noncompliant with work requirements or decides the family has exceeded time limits.

### Work requirements would take away housing assistance from older adults ages 50-61, punishing those who can't work or lose their jobs:

- Older adults age 50 and over have [significantly lower employment rates](#) than younger adults, and more barriers to work.
- Among low-income older adults ages 50-64 enrolled in Medicaid (and not receiving SSI or other disability benefits) who are retired or not working, [the vast majority \(86%\) report having a health condition that prevents them from working](#).
- Among Medicaid recipients ages 50-64 not receiving disability benefits, [only 37% work full-time](#).
- [Older adults over 50 do not always identify as "disabled"](#) even if they qualify as disabled and are unable to work. Disability-related stigmas were particularly negative when older adults were young. With regard to HUD's proposal, some disabled older adults may therefore not seek exemptions or reasonable accommodations based on disability status.
- Many older adults age 50+ also have difficulty finding and retaining work due to [age discrimination](#). [Studies of older workers](#) show that employment becomes increasingly

unstable as people age. Over half of Americans over age 50 working full-time, long-term jobs are pushed out of their jobs by their employers. Many subsequently experience long-term unemployment or are forced to retire before they plan to.

### Family caregivers for older adults would also lose housing assistance:

- While the proposed rule exempts primary caregivers of people with disabilities, it does not explicitly exempt caregivers of older adults.
- Family caregivers often have [difficulty balancing their care duties with their jobs](#). [A third of women caregivers decrease their work hours](#), more than 20% take leaves of absence, and almost 15% retire early.
- Many people caring for aging family members are older adults themselves and [most likely between the ages of 45-64](#).
- Some caregivers with housing assistance may be living with the older adults they support. If these caregivers lose their assistance, the older adults they live with could lose both their housing and the caregiving that allows them to age in place and avoid institutionalization.

### HUD's proposed rule would create confusion for tenants:

- Nationally, [over 3,000 PHAs](#) and HUD-assisted owners could have different work requirements and time limits across different programs and even different properties.
- Tenants receiving other public benefits would have to navigate multiple sets of work requirements with different rules. For example, [under new Medicaid and SNAP work requirements](#), people must generally work 80 hours per month, i.e. 20 hours per week. In contrast, PHAs/owners could require people to work up to 40 hours per week.

## More Resources

- [Work Requirements and Time Limits Will Worsen Housing Instability](#), National Housing Law Project, Center for Law and Social Policy, Justice in Aging, National Low Income Housing Coalition, and Southern Poverty Law Center.
- [HUD's Proposed Rule to Cut Housing Benefits](#), National Housing Law Project
- [State-Specific Data on Impact of Work Requirements and Time Limits](#), National Low Income Housing Coalition, National Housing Law Project, Center for Law and Social Policy
- [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