

Regulatory Impact Analysis

FR–6520–P–01: “Establishing Flexibility for Implementation of Work Requirements and Term Limits”

1 Introduction

This proposed rule would allow Public Housing Agencies (PHAs) and multifamily housing owners with Project-Based Rental Assistance contracts (owners) to implement work requirements for work-eligible adult tenants and/or term limits for non-elderly, non-disabled families residing in public housing or receiving assistance through the Housing Choice Voucher (HCV), including project-based vouchers (PBV), or the Project-Based Rental Assistance (PBRA) program. This rule does not mandate work requirements or term limits but rather allows PHAs and owners to impose these requirements and limits, if they choose to do so.

PHAs and owners would be able to adopt work requirements of up to 40 hours per week and impose term limits of no less than 2 years on eligible tenants.¹ PHAs and owners may implement such policies for all or a determined segment of their residents or properties. Any PHA or owner electing to implement work requirements and/or term limits must develop a written policy with parameters, procedures, and other details, which they would include in applicable planning documents,² provide to all tenants and resident organizations, and, for public housing and PBRA, reflect in leases. PHAs and owners imposing work requirements or term limits must also provide or partner with third parties to provide supportive services. The PHA or owner would be responsible for verification and enforcement of tenant compliance with their chosen work requirements and/or term limits policy.

In this Regulatory Impact Analysis (RIA), HUD discusses the expected economic impacts of this rule. Precisely quantifying the impacts is difficult because there is a nearly infinite range of possible outcomes due to the control PHAs and owners would have over the scope and details of the policies enacted. HUD quantifies some of the expected impacts by imagining likely scenarios of policy adoption by PHAs and owners. The most notable expected economic impacts include:

- Costs to PHAs and owners that adopt work requirements or term limits, and to HCV landlords with tenants who receive assistance from PHAs that implement work requirements or term limits.

¹ PHAs and owners may only apply work requirements to tenants who are “work-eligible,” defined as ages 18 to 61 and excluding persons with a disability, individuals enrolled as a student in an institution of higher education, primary caretakers (individuals who bear primary responsibility of the care for any dependent child under the age of six years, of children or adults with disabilities in the tenant family, or of elderly or temporarily incapacitated individuals in the tenant family), or individuals who are pregnant. PHAs and owners may only apply term limits to tenant households that are not elderly or disabled families as defined in 24 CFR 5.403.

² Any work requirements or term limit policy must be included in the PHA’s administrative plan if implemented in the HCV and PBV programs, or in the PHA’s admission and continued occupancy policy (ACOP) if implemented in the public housing program, or in the owner’s tenant selection plan if implemented for the PBRA program.

- Benefits to firms that employ assisted tenants.
- Transfers from assisted tenants impacted by work requirements or term limits to families gaining assistance under this rule and to the federal treasury.

Although this analysis discusses costs to PHAs and owners, it is important to remember that individual PHAs and owners can easily avoid these costs by opting to not adopt work requirements or term limits. The PHAs and owners that incur the costs would only do so if they perceive benefits from enacting the policies that outweigh the costs. The costs to PHAs and owners presented here are not regulatory costs insofar as PHAs and owners are not required to incur the costs to fully participate in from the public housing, HCV, or PBRA programs.

2 Need for Rule

This rule furthers the economic self-sufficiency requirement in the Housing Act of 1937 by allowing PHAs and owners to address disincentives to work in the public housing, HCV, and PBRA programs. Section 3(a)(2)(D) of the Housing Act of 1937 states that “the rental policy developed by each public housing agency shall encourage and reward employment and economic self-sufficiency.” The ability to impose work requirements and term limits are a way PHAs and owners could encourage economic self-sufficiency³. PHAs that participate in the Moving-to-Work (MTW) demonstration already have clear authority to implement work requirements and term limits. However, current HUD regulations do not clearly allow or prohibit non-MTW PHAs or PBRA owners from implementing work requirements and term limits. This rule clarifies that authority for all high-performing PHAs and owners.

The Housing Act of 1937 also directs HUD to provide PHAs the maximum amount of flexibility in program administration and to assist State and local governments with addressing the shortage of housing affordable to low-income families. This rule would expand flexibility for PHAs and owners in implementing HUD’s housing assistance programs, enabling them to address the shortage of affordable housing by extending assistance to more eligible households.

Additionally, Congress authorized the PBRA program, in part, to promote “economically mixed housing.”⁴ Allowing owners to require able-bodied PBRA tenants to work could increase the earnings of some households and thus increase economic diversity.

2.1 The Labor Disincentive of Housing Subsidies

In the public housing, HCV and PBRA programs, a tenant’s rent payment is generally based on household income and increases as income increases. Eventually, a family that is over-income will be subject to termination or required to pay a higher rent.

³ By limiting the duration of housing assistance, term limits are an indirect way to encourage self-sufficiency. In a review of term limit policies imposed by MTW agencies (Miller et al., 2007), PHAs stated that a primary reason for adoption of term limits was promoting self-sufficiency.

⁴ See 42 U.S.C. 1437f(a).

Economic theory suggests that there could be a tendency of housing assistance to diminish labor supply. There are two potential sources of labor disincentives, changing whether and how much assisted tenants work. First, the receipt of nonlabor income in the form of a housing subsidy could affect the labor supply of households. For example, households experiencing an increase in wealth have been found to reduce labor supply (Cesarini et al., 2017; Imbens et al., 2001; Li et al., 2020). Second, the design of HUD's housing assistance, which decreases the subsidy as a household's income increases, can reduce the labor supply of recipients. For every additional dollar of income, a typical assisted household would receive 70 cents, after paying their contribution to rent while the consumption of housing does not change at all. The first effect can be thought of as an "endowment effect" and the second as a "wage effect."

The labor supply response of every assisted household will depend upon how they make tradeoffs between leisure (which decreases with additional labor hours) and consumption (which increases with additional labor income). The positive endowment effect of receiving housing assistance will increase leisure and thus reduce labor effort (as long as leisure is a "normal" good). The negative wage effect of housing assistance on labor supply is ambiguous.

The direction and extent to which a household's labor effort changes depend on the "income" and "substitution" effects of a wage change on leisure. The income effect describes the ability of higher income individuals to afford more leisure (or any other normal good). The substitution effect describes the change in opportunity cost of wages foregone. A decline in effective wages would lead to less leisure (and more labor) through the income effect but more leisure (and less labor) through the substitution effect. The net effect is measured by the labor supply elasticity (percent change in hours worked/percent change in wage rate). Bargain and Peichl (2016) provide a review of estimated elasticities, which are either slightly negative or slightly positive, indicating inelastic labor supply curves. Low wage households may have higher (and more positive) labor supply response than other households (McClelland and Mok, 2012) because a wage increase would stimulate participation in the labor force for those households without any labor income. The labor response of a particular assisted household from receiving assistance will depend upon the age of prime-age adults, household composition (number of adults and children), disability status, prior work experience, and especially on whether there are sufficient job opportunities offered by the local labor market. Finally, our brief discussion of the labor-leisure tradeoff ignores how the additional housing services would affect a family's choice. Examining empirical work is necessary to develop an estimate of the efficiency impact.

In a study of HUD's Welfare to Work demonstration program, Mills et al. (2006) find that rental assistance initially reduces labor supply, negatively affecting employment only in the first 2 years of assistance. Wood et al. (2004) finds a small, but negative effect on labor and earnings for recipients of housing vouchers. Gubits et al. (2015) found that housing assistance reduced employment initially by 19 percent but after three years, the effect was only about 2.5 percent. Jacob and Ludwig (2012), studying the Housing Choice Vouchers program in Chicago in the 1990s, found that the housing assistance reduced labor force participation of working-age and

able-bodied adults by 3.6 percentage points (6 percent of the control group), reduced quarterly earnings by 10 percent compared to the control group, and the effect was persistent. The researchers did not have data concerning hours but estimated from their income data a decline of work hours equal to 4.6 percentage points (11 percent of the control group). These authors estimate that a 1 percent increase in nonlabor income decreases labor supplied by 0.9 percent. In contrast, Shroder (2002), in a review of studies completed before the Jacob and Ludwig research, concluded that HUD's housing assistance has no effect on recipient's labor supply. HUD's estimate of the loss in earnings in this RIA is based on Jacob and Ludwig's estimate of the change in hours worked from a change in nonlabor income (housing assistance).

3 Background

3.1 Households and Programs Affected by the Proposed Rule

This proposed rule affects HUD's public housing and HCV (including project-based vouchers) programs, which are administered by approximately 3,800 local PHAs, and HUD's Project-Based Rental Assistance (PBRA) program, which is administered by approximately 24,000 owners. Table 1 shows the approximate number of households assisted by each of these programs in 2024 and the portion of them that could be affected by work requirements and/or term limits. In each of the affected programs, assisted tenants generally pay rent that is about 30 percent of the family's income. The public housing program serves approximately 800,000 families that lease a unit owned by the PHA. In the HCV program, about 2.4 million families either select housing on the private market, or, for project-based vouchers, lease a unit already under contract with the PHA. PHAs pay a housing assistance payment directly to the landlord on behalf of the HCV family and the family pays the difference between the actual rent charged by the landlord and the PHA's subsidy. Under the PBRA program, either HUD or a PHA acting pursuant to an annual contributions contract with HUD provides rental assistance payments via a Housing Assistance Payments contract to project owners. About 1.2 million households lease PBRA units.

Table 1: Current Participants

HUD Program	Total active households	Active household members			
		Under 18 years old	Over 61 years old	18-61 years old	
				Disabled ⁵	Not disabled
Public Housing	800,000	500,000	300,000	200,000	500,000
HCV (including PBV)	2,400,000	2,000,000	900,000	700,000	1,700,000
PBRA	1,200,000	600,000	700,000	200,000	600,000
Total	4,400,000	3,100,000	2,000,000	1,100,000	2,900,000

Totals may not sum due to rounding. Source: HUD administrative data on rental assistance recipients in 2024.

Table 2 shows the proportion of assisted households and household members that have wage income. Under this proposed rule, PHAs and owners could only apply work requirements to individuals between 18 and 61 years old without a disability. Recent data suggests between 38 and 46 percent of this population of assisted tenants currently has wage income.

Table 2: Wage Income among Current Participants

HUD Program	% households with wage income	% members with wage income	
		All members	18-61 years old, not disabled
Public Housing	33%	18%	46%
HCV (including PBV)	32%	16%	42%
PBRA	19%	12%	38%

Source: HUD administrative data on rental assistance recipients in 2024.

3.2 Self-Sufficiency Efforts in HUD Programs

To address the potential disincentive to work and increase self-sufficiency, some federal programs have adopted or allowed work requirements for non-elderly, able-bodied recipients and set term limits on benefits. HUD has attempted to directly build tenant self-sufficiency through a variety of programs and demonstrations. As discussed below, evaluations of these efforts show that only the MTW approach resulted in clearly positive outcomes.

The first HUD program established for this purpose was the Family Self-Sufficiency (FSS) program in 1990.⁶ FSS provides support services and economic incentives to families receiving rental assistance from PHAs and the PBRA program. Participating PHAs and PBRA owners⁷ receive grants from HUD to fund FSS coordinators who work with tenants. Tenants receive a financial incentive in which increases in income do not affect rental payments. Instead, 30 percent of the increased earnings are deposited into an escrow savings account, which the tenant can access after graduating from the FSS program. The FSS program is voluntary, and families

⁵ PHAs and owners use the definition at disabled located at 24 CFR 5.403.

⁶ A similar program, Resident Opportunity for Self-Sufficiency (ROSS), was created in 2015.

⁷ FSS was extended to the PBRA program in 2015.

participate for a maximum of 5 years, although PHAs or PBRA owners may grant an extension of up to 2 years. In FY 2025, approximately 74,000 families participate in FSS programs administered by about 700 PHAs.⁸ In a ten-year evaluation of the FSS program, Freedman et al. (2023) found a graduation rate of only 20 percent and FSS participants did not have statistically significant differences in earnings or employment rates than the control group. Overall, about 60 percent of FSS households have savings in their escrow account, indicating an increase in earned income.

The Moving to Opportunity (MTO) demonstration was authorized by the 1992 Housing and Community Development Act and was administered by 5 PHAs⁹ from 1994 to 1999. In contrast to the FSS program, employment support services were not provided. Instead, families that volunteered for this program received mobility counseling and housing vouchers that could be used only in low-poverty areas.¹⁰ An evaluation of the MTO demonstration found that it did not lead to improved employment opportunities or increased income, demonstrating the importance of FSS' support services.¹¹

In 1996, Congress created the Moving to Work (MTW) demonstration to encourage innovative approaches to increasing the cost effectiveness of federal housing assistance and improve outcomes for assisted tenants.¹² Participation in MTW provides PHAs flexibility in the administration of public housing and housing vouchers including fungibility among the various sources of funds (voucher housing assistance, voucher administrative fee, public housing capital and operating funds) not available to non-MTW PHAs. This flexibility has been used by several PHAs to implement and support work requirements and term limits. Since 1999, 20 PHAs have implemented work requirements and 22 PHAs have implemented term limits. As of February 2025, 15 PHAs have work requirements and seven PHAs have term limits. Another 17 PHAs have expressed interest in adopting work requirements. All MTW agencies that maintain work requirements provide support services to aid tenants in their employment search.

Several studies find positive results for work requirements in MTW PHAs. The only rigorous empirical study, Rohe et al. (2016), found that the Charlotte Housing Authority's work requirement policy was associated with increased employment rates among affected residents, from 51 percent at baseline to 88 percent after implementation, although average hours did not increase (the authors did not have access to earnings data). The authors also found that the rate of

⁸ See https://archives.hud.gov/budget/fy25/2025_CJ_Program_-_Self-Sufficiency_Programs.pdf. There is potential for overlap between the FSS program and work requirements imposed through this proposed rule which could lead to overestimation of the true benefits, costs, and transfers.

⁹ The five PHAs were in Baltimore, Boston, Chicago, Los Angeles, and New York.

¹⁰ Participating families were placed in one of three groups. One group received a housing voucher that could be used only in a low-poverty neighborhood and mobility counseling. A second group received a housing voucher that could be used in any neighborhood. The third group did not receive either, but continued to receive project-based rental assistance.

¹¹ See Sanbonmatsu, et al. (2011).

¹² The Moving to Work (MTW) Demonstration Program was authorized by the Omnibus Consolidated Rescissions and Appropriations Act of 1996.

positive move-outs increased and the rate of negative move-outs decreased. Importantly, the Charlotte Housing Authority, like all MTW agencies implementing work requirements, provided supportive services in conjunction with the requirement. The Charlotte Housing Authority directly provided life coaches and case management services to residents subject to the work requirement. In addition, the housing authority partnered with local workforce development organizations to assist households and provides numerous other services to all assisted households, regardless of whether they are subject to the work requirements (HUD 2022). A review of experiences of MTW agencies implementing work requirements by HUD (2022) found that these support services were viewed by PHAs as crucial to successful outcomes from the work requirement.

In 1996, Congress created the Jobs-Plus demonstration program in the Omnibus Consolidated Rescissions and Appropriations Act of 1996. Six PHAs¹³ administered this demonstration from 1998 to 2003 and received funding from the Rockefeller Foundation and local governments in addition to HUD. Technical assistance was provided to the PHAs to establish and implement the program. Jobs-Plus provided residents various support services to assist in obtaining employment and financial incentives that reduced rental increases as employment income increased. Although an evaluation of the original cohort of six cities (Bloom 2005) found a small, but statistically significant increase in earnings for participants, an evaluation of the most recent cohort (Riccio 2021) found no differences in outcomes for program participants and a comparison group in terms of earnings and employment rates.

In 1998, HUD consolidated three existing supportive programs (Tenant Opportunities Program, Economic Development and Supportive Services Program, and Public Housing Service Coordinators Program) to create the Resident Opportunities and Self-Sufficiency (ROSS) program. ROSS provides funding for service coordinators who connect residents to local services. In 2008, ROSS was further consolidated and renamed the Resident Opportunity and Self-Sufficiency Service Coordinator (ROSS-SC) program. Service coordinators funded through ROSS-SC connect residents to various services, including health, adult education and child care. An evaluation of the ROSS-SC program by Scally et al. (2019) indicated that the program's services had a positive impact on tenant's earnings and employment, but ultimately concluded that data was not sufficient to produce a statistically reliable conclusion.

More recently, HUD established a rent reform demonstration program in 2015 to provide work incentives for HCV recipients. This demonstration, however, did not produce statistically significant increases in tenant employment or earnings (see Riccio, et al., 2024).

3.3 Self-Sufficiency Efforts in Other Federal Assistance Programs

The proposed maximum work requirement of 40 hours per week and term limits of no less than two years are intended to align with other federal programs that impose or allow work

¹³ The six participating PHAs were in Baltimore, Chattanooga, Dayton, Los Angeles, St. Paul, and Seattle.

requirements and term limits, including the Supplemental Nutrition Assistance Program (SNAP), administered by the U.S. Department of Agriculture (USDA) through state agencies, and Temporary Assistance for Needy Families (TANF) administered by the U.S. Department of Health and Human Services (HHS) through state agencies. SNAP generally requires at least 80 hours of work per month and limits benefits to 3 months over a 36-month period.¹⁴ TANF benefits have a federal lifetime limit of 60 months, which can be extended for hardship.¹⁵

4 Expected Adoption of Work Requirements and Term Limits

Since the proposed rule gives PHAs and PBRA owners more choice over policies within their programs but does not mandate any change, the magnitude of its impact will depend on how many PHAs and owners opt to make changes. PHAs and owners that choose to adopt new policies would incur implementation costs as they comply with this rule. The impact of the policies would also depend on how affected assisted tenants respond to work requirements and term limits. Some work-eligible tenants would respond by finding jobs or working more to meet the work requirement or prepare for the end of their term. Some would meet work requirements by reporting work they otherwise would have omitted. Some tenants would exit housing earlier than they would have absent this rule because they fail to meet work requirements or reach the end of a term limit.

In this analysis, HUD describes the expected benefits and costs gained or incurred by affected entities (i.e., PHAs, owners, landlords, households) relative to a baseline of the current regulations. It also discusses the expected economic transfers between entities, a significant impact of this proposed rule.

4.1 Expected Adoption by PHAs and PBRA Owners

The number of PHAs and owners that pursue new work requirement or term limit policies will be limited by the fact that opting into the new policies would require the PHA or owner to allocate resources to developing and implementing them. These increased costs are detailed in the “Implementation Costs” section below. Under this proposed rule, HUD would not provide additional resources to PHAs or owners that pursue work requirements or term limits, nor would PHAs opting in to these policies be able to take advantage of the statutory fungibility of funding sources available to MTW PHAs to provide support services. Also, any increase in rental income resulting from higher tenant earnings would generally not result in increased total revenue for the PHA or owner.

On the other hand, there are other considerations that would motivate PHAs and owners to adopt new work requirement or term limit policies. All PHAs and some PBRA owners are mission-driven organizations, and they may want to use the policies to further their mission of improving

¹⁴ See <https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program>.

¹⁵ See <https://sgp.fas.org/crs/misc/R43400.pdf>.

self-sufficiency for housing assistance recipients. They may also want to use work requirements or term limits to improve the availability of assisted housing to unassisted families and move through their waiting lists. Additionally, State governments may direct social service organizations under their jurisdiction to pursue measures that promote self-sufficiency, and this proposed rule would enable PHAs to comply with such directives.

Motivations for adopting work requirements or term limits are likely to be less compelling in the PBRA program compared to the PHA-administered HCV and public housing programs. Over 70 percent of PBRA units are owned by profit-motivated (i.e., not non-profit or limited dividend) companies. For these companies, mission-driven motivations for choosing policies likely would not override profit considerations. They, as well as many of the non-profit and limited dividend organizations that own the remainder of the units, are not chartered by State and local governments and therefore cannot be compelled to enact self-sufficiency policies by a State or local government like PHAs could be.

The 138 PHAs currently operating under the MTW demonstration already have the opportunity to implement work requirements and/or term limits. Although not all of them have pursued work requirements or term limits in their MTW plans, they could do so if motivated to implement the policies. In this RIA, HUD does not include MTW PHAs in estimates of the incremental impacts of this proposed rule because the rule would not change their ability to implement work requirements and/or term limits.

4.2 MTW Experience

HUD assumes that PHAs would likely implement work requirements and/or time limits similarly to the observed experiences of MTW agencies. Nine of the original 39 MTW PHAs implemented work requirements, starting with the Delaware State Housing Authority in 1999. In 2022, HUD published a review of the experiences of these nine PHAs (see HUD 2022).

About one quarter of the original MTW cohort implemented work requirements (9 out of 39), implying up to 25 percent of all agencies might adopt policies under this proposed rule. However, two of these agencies eventually eliminated the requirements. Since the MTW program was expanded to 139 agencies, 32 PHAs have implemented or have expressed interest in implementing work requirements and term limits and another 3 agencies have implemented only term limits.¹⁶ This also implies that about 25 percent of agencies could be expected to implement work requirements and/or term limits under this proposed rule. Since MTW agencies are expected to be more likely to experiment with policy changes than other PHAs, and many PHAs that want work requirements or term limits have likely already sought to participate in MTW, 25 percent is the expected *upper* limit of agencies that would use the flexibility in this

¹⁶ One of the original MTW agencies that implemented both work requirements and term limits, ended their work requirement but retained their term limit. Thus, a total of 4 PHAs currently have only term limits. They are the Housing Authority of the County of San Mateo (CA), the Housing Authority of the County of San Bernardino (CA), the Tulare County Housing Authority (CA), and the Tacoma Housing Authority (WA).

rule.¹⁷ Additionally, State laws in Arkansas¹⁸ and Wisconsin¹⁹ could compel many or all PHAs in those States to adopt work requirements.

While about one-quarter of MTW PHAs implement or have interest in implementing work requirements and/or term limits, PHAs with work requirements and/or term limits have only applied them to a fraction of their households. As noted in HUD’s evaluation, the requirements for two agencies applied to more than half of the households: about 75% in Charlotte and 60% in Champaign County. Three agencies, Atlanta Housing, Delaware State HA, and Lawrence-Douglas County HA, applied these policies to only about one-third of households. The policies for Lexington-Fayette Urban County HA and Chicago HA applied to about 20 percent and 10 percent of households. Louisville Metro HA and HA of County of San Bernardino applied their policies to only about 1 percent of households and both agencies sunset their policies (although San Bernadino continues to have term limits).

Four of these nine agencies (Atlanta, Delaware, San Bernadino, and Lawrence-Douglas County) applied the work requirements to both public housing and HCV households (Atlanta, Delaware and San Bernadino also applied these to PBV recipients). Chicago and Louisville applied the work requirements to only public housing. Champaign County and Charlotte applied the work requirements to only HCV (and PBV) households. Charlotte and Champaign County, the only two agencies to apply the work requirements to more than one-third of households, applied the requirements only to HCV holders. Thus, of the approximately 25 percent of PHAs that could be expected to adopt work requirements, it’s likely that one-quarter would apply the requirements only to the HCV program, and a higher percent of households (perhaps two-thirds), and the remaining would apply the requirements to both public housing and HCV (including PBV) households, but only for 10 percent to 30 percent of those households. Table 3 provides a summary of MTW PHAs policies on work requirements and/or term limits.

Table 3: Summary of MTW Experience

PHA	Work Requirements			Term Limit
	Programs	Requirement	Households Subject to WR ¹	
Atlanta	Pub Hsng, HCV	Average 20 hrs/wk	8,600 (33%)	None
Champaign Cnty	HCV	25 hrs/wk & min income	1,200 (60%)	8 yrs
Charlotte	HCV	20 hrs/wk per Household	3,600 (46%)	None
Chicago	Pub Hsng	20 hrs/wk	5,900 (9%)	None
Delaware	Pub Hsng, HCV	Yrs 1-2: 20 hrs/wk; Yr 3: 25 hrs/wk	500 (36%)	7 yrs

¹⁷ This assumption is consistent with the estimates in HUD’s Paperwork Reduction Act submission for this proposed rule (see preamble of the Notice of Proposed Rulemaking).

¹⁸ Arkansas Code § 14-169-109. The Arkansas statute defines “work requirements” as a requirement for “able-bodied adults” to do one of the listed work activities for 20 hours per week or to participate in a workfare program. Arkansas’ statutory definition of “able-bodied adult” is one who is 19 to 64 years of age with specific exclusions consistent with HUD’s proposed exclusions.

¹⁹ Wisconsin Statute 16.314. The Wisconsin statute directs the state’s Department of Administration to require PHAs to create “employability plans”, but does not prescribe specific parameters for the plans or specify a definition of able-bodied adult.

		Yrs 4-7: 30 hrs/wk		
Lawrence-Douglas Cnty	Pub Hsng, HCV	15 hrs/wk	400 (31%)	None
Lexington	Pub Hsng	Group 1: 37.5 hrs/wk Group 2: 20 hrs/wk	813 (31%)	None
	HCV	Yrs 1-2: 20 hrs/wk Yr 3: 25 hrs/wk Yrs 4-5: 37.5 hrs/wk		5 yrs (w/ possible 2 yr extension)
Louisville	Pub Hsng	20 hrs/wk	106 (1%)	5 yrs
San Bernardino Cnty	Pub Hsng, HCV (port-in only)	15 hrs/wk	179 (1%)	None

¹ Number of households subject to work requirement and percentage of total assisted households subject to work requirement.

Four of the nine MTW agencies in HUD’s evaluation also implemented term limits: Champaign County (8 years); Delaware (7 years); Lexington (5 years with 2-year possible extension); and Louisville (5 years). As of February 2025, seven MTW PHAs imposed term limits without work requirements. Champaign County, Delaware, and Lexington-Fayette Urban County implemented a combined work requirement/term limit policy in which the work requirements increased gradually to build self-sufficiency over the term. There are no outcome statistics for Lexington-Fayette Urban County, but Champaign County and Delaware reported high success rates in terms of compliance, increased household income, and households moving into homeownership. While the level of support services is a factor in obtaining self-sufficiency, it should be noted that Lexington-Fayette Urban County did not provide direct support services, only referrals, due to a lack of funding, yet their program has been successful in terms of increasing household income and increasing the number of households meeting the PHA’s definition of self-sufficiency²⁰. As of February 2025, five of the 15 MTW PHAs that implement work requirements also have term limits. Thus, it seems reasonable that up to one-third of PHAs that implement work requirements would also adopt term limits. The PHAs with term limits have limits of 5 to 8 years.

4.3 Adoption Scenarios for this Regulatory Impact Analysis

Given the flexibility provided by this proposed rule, possible adoption scenarios range from no adoption of either work requirements or term limits to all eligible PHAs and owners adopting work requirements and term limits for all work eligible public housing, HCV and PBRA tenants. Instead, HUD uses two more central scenarios of adoption for the purpose of estimating the economic impacts of the proposed rule. The scenarios are based on HUD’s analysis of MTW PHA adoption of work requirements and term limits discussed above. Because there are State laws intended to compel PHAs in Arkansas and Wisconsin to adopt some form of work requirements, the scenarios assume all Arkansas and Wisconsin PHAs will adopt policies under this rule. PHAs have not yet implemented work requirements under these laws. This analysis

²⁰ The Lexington-Fayette Urban County Housing Authority defines self-sufficiency as annual income equal to the Federal minimum wage for 40 hours per week and 52 weeks per year. See Lexington Housing Authority (2022).

does not interpret the State laws or predict the PHA policies that they will require. The existence of the laws is used only to inform the hypothetical scenarios in this analysis.

1. “High adoption” scenario where all eligible²¹ PHAs in Arkansas and Wisconsin adopt policies that apply to all their participants, 25 percent of eligible PHAs outside Arkansas and Wisconsin adopt policies that apply to half their participants, and 10 percent of PBRA owners that are non-profits adopt policies that apply to all their participants.²² The policies are 20 hour/week work requirements and 5-year term limits.²³ In the high adoption scenario, 1,016 PHAs (with approximately 1,320,000 total assisted individuals) and owners with 499 PBRA contracts (with approximately 40,000 total assisted individuals) adopt work requirements and term limits.
2. “Low adoption” scenario where all eligible PHAs in Arkansas and Wisconsin adopt policies that apply to all their participants, 10 percent of eligible PHAs outside Arkansas and Wisconsin adopt policies that apply to one quarter of their participants, and 5 percent of PBRA owners that are non-profits adopt policies that apply to all their participants. The policies are 20 hour/week work requirements and 5-year term limits. In the low adoption scenario, 523 PHAs (with approximately 530,000 total assisted individuals) and owners with 257 PBRA contracts (with approximately 20,000 total assisted individuals) adopt work requirements and term limits.

PHAs and owners implementing work requirements and term limits would have the authority to choose from a wide range of policy parameters (e.g., the minimum number of work hours, the length of term limits, and which programs or housing projects will be affected by the new policies). Since this analysis uses the scenarios above to sketch a simplified illustration of the

²¹ Eligible PHAs are those not designated as a “troubled performers” under the Public Housing Assessment System. As of early 2025, 116 PHAs are currently designated as “troubled performers.” These PHAs account for approximately 5 percent of active public housing families and 6 percent of active HCV families.

²² To simulate policy adoption by a subset of PHAs and owners, this RIA used random selection of PHAs and nonprofit owners using the expected proportion of adopters as the probability of adoption (e.g., in the high adoption scenario, each eligible PHA outside Arkansas and Wisconsin has a 25 percent chance of adopting policies). A similar technique is used to select the subset of tenants in each PHA that would be subject to the requirements. The result is that, in the high scenario, all public housing and HCV families in non-MTW or troubled PHAs in Arkansas and Wisconsin; approximately 12.5 percent of public housing and HCV families outside Arkansas, Wisconsin, and troubled or MTW PHAs; and approximately 10 percent of all PBRA families in units owned by nonprofits are covered by the policies. In the low scenario, all public housing and HCV families in non-MTW or troubled PHAs in Arkansas and Wisconsin; approximately 2.5 percent of public housing and HCV families outside Arkansas, Wisconsin, and troubled or MTW PHAs; and approximately 5 percent of all PBRA families in units owned by nonprofits are covered by the policies.

²³ The assumption that PHAs and owners will choose work requirements of 20 hours per week and term limits of five years is based on the most common parameters chosen by MTW PHAs that implemented work requirements or term limits. See Miller et al. (2007) and HUD (2022). Additionally, many MTW agencies that adopted work requirements or term limits did not adopt both. For simplicity, the scenarios in this RIA use one set of PHAs and owners to illustrate the effects of both work requirements and term limits. Since this RIA does not examine the potential interaction of both policies in a single PHA and the estimates below are each based on work requirements or term limits but not both, the scenario’s application of both policies to each PHA and owner does not affect the findings of the RIA. HUD believes that the scenarios’ numbers of PHAs and owners adopting a new policy (work requirements, term limits, or both) under this rule is a reasonable projection based on the information available.

potential scope of the impact of this rule, HUD assumes all PHAs and owners implementing policies choose the same parameters. The actual landscape would be varied, as different PHAs and owners choose different parameters for their work requirement and term limit policies.

Table 4 illustrates the potential scope of individuals and families affected by work requirements under the two hypothetical adoption scenarios using HUD administrative data on the 2024 population of assisted tenants.

Table 4: Tenants Affected by Work Requirements by RIA Scenario

Adoption Scenario	Policy Adopter	Work Eligible Adults Subject to Work Requirements ²⁴		Families with at Least One Non-Compliant Member
		Total	Not Compliant with Work Requirement ²⁵	
Either	Arkansas PHAs	9,000	5,000	5,000
	Wisconsin PHAs	8,000	4,000	3,000
High Adoption	PHAs outside AR & WI	132,000	78,000	62,000
	Nonprofit PBRA owners	4,000	3,000	2,000
	Total	153,000	90,000	72,000
Low Adoption	PHAs outside AR & WI	20,000	11,000	9,000
	Nonprofit PBRA owners	2,000	1,000	1,000
	Total	39,000	22,000	18,000

Source: HUD administrative data on rental assistance recipients in 2024.

Based on 2024 tenant data, 90 percent of the work eligible adults that appear to be working less than required by the work requirements in the adoption scenarios had no wage income. Sixty-three percent of the work eligible adults with no wage income lived either as single-person households or in households with only non-wage-earning work eligible adults and children. The remaining 37 percent of work eligible adults with no wage income lived in households with adults who would not be out of compliance with the work requirements because they were not work eligible (i.e., elderly or disabled) or had wage income.

Table 5 shows the number of families actively receiving housing assistance in 2024 that would be subject to term limits under the two hypothetical adoption scenarios, and how many had been active in their assistance program for over two years (the minimum length of term limits permitted under this proposed rule) or over five years (the length of the term limit in the adoption

²⁴ This total does not include HCV participants in the Veterans Affairs Supportive Housing (HUD-VASH) program since the proposed rule would not allow work requirements to apply to these tenants. Following the definition in the proposed rule, “work eligible” adults include adults between the ages of 18 and 61 who have not indicated a disability, are not pregnant (pregnancy status is not observed in the data but an estimate is imputed using the average US fertility rate), and do not appear to be “primary caregivers” as defined in the proposed rule.

²⁵ HUD does not collect data on hours worked. This analysis imputes weekly hours worked by dividing reported annual wage income by 52 weeks and the federal minimum wage of \$7.25. Since many individuals likely work at higher wage rates, the imputed hours used here is likely an overestimate.

scenarios in this RIA). Term limits would be prospective in application and a family’s tenure before the adoption of term limits would not count towards the limit.

The non-elderly, non-disabled families shown in Table 5 have an average of 1.4 adults and 1.5 children per family. The total number of individuals in non-elderly, non-disabled families with tenure over two years in programs adopting term limits in the hypothetical adoption scenarios is 334,000 in the high scenario (164,000 adults and 170,000 children), and 88,000 in the low scenario (41,000 adults and 47,000 children).

Table 5: Families Affected by Term Limits by RIA Scenario

Adoption Scenario	Policy Adopter	Non-Elderly, Non-Disabled Families in Programs with Term Limits ²⁶		
		Total	Tenure Over 2 Years	Tenure Over 5 Years
Either	Arkansas PHAs	12,000	7,000	4,000
	Wisconsin PHAs	9,000	6,000	4,000
High Adoption	PHAs outside AR & WI	127,000	97,000	69,000
	Nonprofit PBRA owners	5,000	3,000	2,000
	Total	152,000	113,000	79,000
Low Adoption	PHAs outside AR & WI	20,000	15,000	11,000
	Nonprofit PBRA owners	2,000	1,000	1,000
	Total	43,000	29,000	19,000

Source: HUD administrative data on rental assistance recipients in 2024.

Another approach to understanding the scope of families that would be impacted by term limits is to examine the length of stay of recently admitted cohorts of assisted tenants. Of the non-elderly, non-disabled households admitted to the public housing, HCV or PBRA programs in 2022, 63 percent were still active two years later. Of the households admitted in 2019, 42 percent were still active five years later.

Implementation and Administrative Costs

PHAs and owners that implement work requirement or term limit policies would incur costs that would not be offset by additional HUD funding, increased net revenue, or the ability to move funds into policy support from other HUD sources (as MTW PHAs can). One-time implementation costs include crafting the details of the policy, updating planning documents, and notifying existing applicants, tenants and tenant organizations. Ongoing costs include monitoring and enforcing tenant compliance with the policy. The proposed rule also requires that PHAs and owners with work requirements or term limits provide or partner with third parties to provide supportive services to help tenants find adequate work.

²⁶ This total does not include HCV participants in the HUD-VASH or Family Unification Program since the proposed rule would not allow term limits to apply to these tenants. “Elderly families” and “disabled families” are defined in 24 CFR 5.403. Under this proposed rule, PHAs could not apply term limits to these families.

Since this rule would expand options for PHAs and owners, they would only choose to implement work requirements and/or term limits when they believe the benefits of the policy outweigh the costs. PHAs and owners can easily avoid these costs by opting to not adopt work requirements or term limits (unless required by state law). Although this analysis quantifies some of the costs of implementing the policies, the motivations for PHAs and owners to adopt them are not easily quantified and are highly specific to each organization.

Table 6 provides estimates of the implementation costs PHAs and owners would incur if they pursued the optional policies described in this rule. The lower and upper estimates are based on the low adoption and high adoption scenarios.

Table 6: Work Requirement/Term Limit Implementation Costs

One-Time Costs: Developing Policies, Updating Documents, Notifying Tenants							
Affected Entity	Develop Policy	Update Program Documents	Hourly Cost ²⁷	Lower Estimate		Upper Estimate	
				Affected Entities	Total Cost	Affected Entities	Total Cost
PHAs	16-24 hrs.	6 hours	\$49.25	523	\$566,700	1,016	\$1,501,100
PBRA Owners	8-16 hrs.	6 hours	\$49.25	257	\$177,200	499	\$540,700
Public input (for PHAs)	8 hours	0 hours	\$20.22	523	\$84,600	1,016	\$164,300
Total					\$828,500		\$2,206,100
Annual Costs: Support Services and Enforcement							
Affected Entity	Households with Work Eligible Members		Cost per Household		Total Cost		
	Lower	Upper	Lower	Upper	Lower	Upper	
PHAs and Owners	30,000	112,000	\$0	\$632	\$0	\$17,696,000 ²⁸	

One-time costs to PHAs and owners implementing work requirements or term limits include staff time developing the details of their policy and creating written procedures for implementation. PHAs would have to update their PHA plans, including gathering feedback from the public and from resident advisory boards. PBRA owners would have to update their tenant selection plans. HUD estimates that these tasks will require 16-24 hours of staff time and 8 hours of public comment time for PHAs, and 8-16 hours of staff time for PBRA owners. Additionally, PHAs would have to update their oral briefing and information packets for HCV

²⁷ PHA and owner staff time is monetized using the median hourly wage of property, real estate, and community association managers (code 11-9141 in the Bureau of Labor Statistics’ (BLS) May 2024 Occupational Employment and Wage Statistics), adjusted for inflation to May 2025 dollars. Total labor costs for PHAs and owners are assumed at 150% of these base wages to account for benefits and indirect costs. Public participation time is monetized using BLS’ May 2024 median hourly wage across all occupations, adjusted for inflation to May 2025 dollars, and adjusted downward by 17% to approximate median after tax income.

²⁸ The upper bound of the total cost estimate for PHA/owner work requirement compliance tracking and support services reflects the “high adoption” scenario described above, but further projects that only a quarter of those PHAs and owners that adopt work requirements would include the intensive case management and support services represented by the \$632 per household figure from the Turnham et al.(2015) study.

and update lease language for public housing. HUD estimates that these tasks will require an average of 6 hours of staff time per entity that adopts work requirements or term limits.²⁹

Some PHAs and owners implementing new policies would also incur ongoing implementation costs related to providing support services and tracking and enforcing work requirement compliance. However, the proposed rule would allow flexibility in the support services offered and methods used to track compliance. Some PHAs and owners may track compliance with work requirements using their existing income verification procedures, while others may need to use additional resources to implement their work requirements. Similarly, since the proposed rule does not strictly define the support services offered alongside work requirements, some PHAs and owners may be able to support their tenants with minimal cost, while others will choose to offer comprehensive case management, childcare, transportation, and other services. The upper bound estimate of \$632 annually per household with a work eligible member is based on a HUD study of HCV administrative costs that estimated the cost of case management and employer engagement for households enrolled in the FSS program (Turnham et al., 2015, p. 209). However, these estimates are highly dependent on the policy design choices of the PHA or Owner.

Besides implementation costs for PHAs and owners, new work requirement policies could also increase the administrative burden on affected tenants, even if they were already working enough to meet the requirement. PHAs and owners would be responsible for verifying and tracking compliance with the requirements they implement, and these new procedures may require tenants to answer questions, fill out forms, or complete other tasks to prove their compliance. The amount of administrative burden would depend on the tracking methods chosen by the PHA or owner. Some housing providers would likely be able to design tracking methods using existing information collection to minimize the administrative burden on tenants. HUD does not expect that term limits would require significant administrative effort or resources to implement.³⁰

6 Impacts by Tenant Outcome

Tenants affected by a PHA or owner's new work requirement, who would not otherwise work enough to meet the requirement, would respond by either 1) working more than they would have, 2) reporting income that they otherwise would have omitted, or 3) failing to meet the requirement and potentially losing assistance sooner than they would have. Term limits would

²⁹ HUD notes that it does not have systemic data on MTW agencies' costs to implement work requirements or term limits to inform the assumptions made in this section. In addition, because MTW agencies typically implemented additional, unrelated changes at the same time as adopting work requirements or term limits, it may be difficult to isolate the costs of just implementing the policies proposed under this rule. HUD also notes that it does not expect that PHAs and owners implementing policies under this rule will have to spend significant resources updating their systems in order to comply with the rule.

³⁰ HUD already requires PHAs and owners to keep track of the date families were initially admitted to the program or moved into the PBRA project.

also cause tenants to lose assistance sooner than they would have and may push tenants to work more to prepare for the loss of housing assistance. The actual outcomes of policies enacted under this rule would be highly contingent on choices made by PHAs and owners in designing and implementing the policies.

6.1 More Work Effort to Meet Work Requirements or to Prepare for Term Limit

The number of tenants that would find jobs or increase the hours worked would be contingent on how many PHAs and owners adopt work requirements and the details of their policies. Research and metrics on MTW PHAs has shown a relationship between work requirements and increased employment among assisted tenants. Rohe et al. (2016) provides the only rigorous study of outcomes from an MTW work requirement policy and thus HUD applies the results of this study to the analysis below. Rohe et al. (2016) found that the Charlotte Housing Authority's work requirement policy was associated with an increase in employment rates among affected residents from 51 percent at baseline to 88 percent after implementation, although average hours did not increase (the authors did not have access to earnings data). The authors also found that the rate of positive move-outs increased and the rate of negative move-outs decreased. Applying the adoption scenarios to the 2024 tenant data, an increase in employment rates like those observed by Rohe et al. suggests 59,000 additional employed individuals under the high adoption scenario and 14,000 additional employed individuals under the low adoption scenario, attributed to policies enacted under this rule.

Benefits and Costs to Assisted Tenants

The net effect of the binding work requirements and/or a term limit on the welfare of responsive assisted tenants could be positive, negative, or neutral, depending on their household circumstances and preferences. From HUD's estimate of additional employed individuals, the total increase in tenant income from working is \$716 million per year in the high adoption scenario and \$179 million per year in the low adoption scenario. Since thirty percent of this income would go towards increased rent payments, the total tenant income increase after rent is \$501 million per year in the high adoption scenario and \$125 million per year in the low adoption scenario. On average, an additional \$16,000 per year would be available to each assisted family that gains an employed member, after the rent increase.³¹ The total economic impact to the household, however, would be net of costs, like forgone non-work activities and other opportunity costs associated with work such as transportation, job search, and childcare, which are not included in the estimated increase in earnings. The tenants earning more are working more than they would have if unconstrained by the new policies. If we assume that, in the baseline, tenants make a rational, utility-optimizing choice of how much to work, then being

³¹ The \$16,000 per year is before any increase in income taxes and does not consider the potential reduction in non-housing assistance or increase in refundable tax credits.

forced to work more by the work requirement and/or term limit represents a loss of economic welfare to the affected tenant.³²

On the other hand, there are also considerations that could tilt the effect of a new PHA/owner policy into a net benefit for tenants who work more because of the policy. If the supportive services offered with the work requirement or term limit enable the tenant to access an otherwise inaccessible job or increase overall earning potential, the policy could have a net benefit to that tenant. It is also possible that the paternalistic motivation of the PHA or owner to nudge the tenant into a more socially optimal level of work is justified, even if the tenant would not have made the choice herself. Absent a work requirement or term limit, tenants could choose a level of work that does not optimize their own utility if they lack information about their ability to find a job or the full breadth of benefits that come from working, including improved self-worth, improved community networks, and increased disposable income.

Benefit: Reducing the Labor Disincentive

As explained in Section 2.1, a primary motivation of this proposed rule is to address the labor disincentive caused by the receipt of housing assistance. Households choose their labor supply by maximizing their utility subject to constraints and preferences. Providing a subsidy will change their budget constraints and thus their chosen labor effort because the subsidy could allow households to reach the same level of material comfort with less labor income.³³ This section measures the lost value of the reduced labor caused only by the economic distortion potentially introduced by housing assistance.³⁴ HUD assumes, for the purpose of this estimate, that the work requirement is binding.

³² “Welfare” in this context signifies economic well-being rather than public assistance. If the incentives from housing assistance reduce work effort in favor of leisure for a particular household, then a binding work requirement would reduce the well-being of that household. However, the household that complies with the PHA’s work requirements will continue to realize a net benefit from housing assistance.

³³ Households will be affected differently depending upon their status quo choice of labor hours. Some households whose labor hours are above the chosen minimum requirement will not be affected. Labor participants working below the chosen minimum requirement will have to increase their work hours. Affected households lose the value of leisure but gain income for consumption for every hour of work effort. For those households that are already working and for whom the distortion of assistance on work effort is small, the wage is a close estimate of the value of time (the marginal rate of substitution between consumption and leisure would be the wage (after paying the tenant contribution). The net impact on the wellbeing on those tenants will depend upon the difference between pre- and post-rule hours. The greatest effect of work requirements will be on household members who are not participants of the labor market (unemployed). Non-working households, except for those who are unemployed due to an economic downturn, would face a greater gap between the market wage and their value of not working.

³⁴ The RIA limits the analysis to understanding the difference between a household receiving assistance (labor supply A) with no work requirement present to the same household receiving assistance with a minimum working requirement attached (labor supply R). The same household without housing assistance would have supplied labor hours O. The Jacob Ludwig study informs us that $O > A$ and that a work requirement of $R = O$ would increase work effort for the average household. Households would be better off with housing assistance and a work requirement of O than with no assistance at all. The PHA could also set work requirements such that $R > O$ for the average household. Most households would be better off with a strict work requirement and housing assistance than no assistance at all. If some households found the requirement to be too onerous, then they would be replaced by others that were willing to comply or households exempted from work requirement.

Jacob and Ludwig (2012) studied the effect of housing assistance on labor supply using data from Chicago and found that a 1 percent increase in nonlabor income decreases labor supplied by 0.9 percent. In their analysis, quarterly earnings of household heads decreased by \$329 (\$498 in 2024\$) after receiving housing assistance. This represented 10.6 percent of their quarterly earnings. This estimate is based on all households, both those with and without earned income. The effect is muted when considering only employed household heads (i.e. household heads who continued working after receiving housing assistance). Jacob and Ludwig found that quarterly earnings for household heads who remained employed decreased by \$279 (\$422 in 2024\$), or about 4.4 percent of income.

Table 8 shows the median earned income of non-elderly, non-disabled households in the programs affected by this rule: \$16,950 for public housing tenants, \$16,400 for HCV tenants, and \$11,500 for PBRA tenants. Using an assumed hourly wage of \$15³⁵, Jacob and Ludwig’s findings imply that HUD’s housing assistance decreased annual hours worked, on average, by about 109 hours per household, which is just over 2 hours per week³⁶. This reduction of hours would result in a loss of labor income equal to \$1,261 per household across the 3 programs affected by this proposed rule.

Table 8: Estimated Reduction in Labor Supply Due to HUD Assistance

Program	Median Annual Wage Income¹	Derived Change in Annual Labor Supply (Hours)²	Annual Productivity Loss per Household
Public Housing	16,950	119	\$950
HCV	16,400	115	\$1,337
PBRA	11,500	81	\$1,296
Total	15,400	109	\$1,261

¹Source: HUD Administrative Data

²Assumes average wage of \$15/hour.

In the scenarios in this RIA, HUD estimates that between 18,000 and 72,000 households would be subject to work requirements and include at least one non-compliant member. Based on the lost productivity estimate above, the work disincentive causes a total annual loss of between \$30.9 million and \$124.5 million. This estimated disincentive effect totals about 2 hours per week per household and, assuming a \$15 hourly wage, the average employed households work about 20 hours per week. Thus, the change in earnings depends on the minimum hours of work required. For example, if a PHA requires 20 hours of work per week, most households will already meet that standard, meaning the work requirement will not offset the work disincentive for these households.

³⁵ The Bureau of Labor Statistics (BLS) reports the 10th percentile wage for all occupations in 2024 was \$14.42.

³⁶ Jacob and Ludwig (2012) estimate an income elasticity of -0.09. Applying this to public housing households, for example, which have an average income of \$16,950 and derived weekly labor hours of 22 (based on a \$15 hourly wage) yields a decrease in weekly hours of 1.2. A decrease of 1.2 hours per week at an hourly wage of \$15 yields a decrease in weekly income of \$18.27 and annual loss of \$950.

Table 9: Productivity Loss from Reduced Labor Supply Due to HUD Assistance

Program	Affected Households		Annual Productivity Loss	
	Low	High	Low	High
Public Housing	4,100	17,100	\$7,341,000	\$30,615,000
HCV	12,900	52,900	\$22,304,000	\$91,464,000
PBRA	1,000	2,000	\$1,213,000	\$2,426,000
Total	18,000	72,000	\$30,858,000	\$124,505,000

Benefit: Encouraging Participation in Labor Force

The social costs of unemployment may be greater than those of underemployment. Economic damages such as lost skills and mental and physical health losses may result from long-term unemployment (Picchio and Ubaldi, 2024). Work requirements would push household members that may be “discouraged workers” to enter or re-enter the labor force.³⁷ Barriers to securing employment include less experience, education, skills, knowledge of workplace norms, transportation, and mental and physical health.³⁸ Supportive services provided by the PHA would help tenants overcome many of the barriers to employment. Able-bodied tenants who can work, but who have not worked at all for many years, would need some training and help finding jobs. PHA supportive services would help tenants achieve success and reach a higher level of material welfare.

Transfer: Additional Rent Paid by Working Tenants

Tenants whose income increases from working more pay more in rent, which would go back into the assisted housing program and offset the federal subsidies they would have received. This represents an economic transfer from the working assisted tenants to the federal treasury or to unassisted households who would gain assistance due to the extra program revenue. The value of this economic transfer can be estimated using the projection of additional employed individuals above (59,000 in the high adoption scenario and 14,000 in the low adoption scenario) and the average additional tenant rent expected from each household with a member that gains employment. From the 2024 tenant data, households with at least one work eligible member and no members who would have been out of compliance with a 20 hour per week work requirement were paid, on average, \$418 more in tenant-paid rent per month than households with at least one work eligible member with no wage income. Applying this difference in rent to the projected

³⁷ Discouraged workers are defined by the Bureau of Labor Statistics as “persons who are not in the labor force, want and are available for work, and had looked for a job sometime in the prior 12 months. They are not counted as unemployed because they had not searched for work in the prior 4 weeks, for the specific reason that they believed no jobs were available for them.” Marginally attached workers are those for whom “any reason could have been cited for the lack of job search in the prior 4 weeks.”

³⁸ Danziger et al. (2000) found that statistically barriers to whether a woman works 20 or more hours per week were lack of H.S. education, fewer than 4 skills, perceived discrimination, transportation problems, major depressive disorders, drug dependence, and mother’s health problem.

increase in employed tenants, the total value of the transfer from assisted families³⁹ gaining employed members to the federal treasury or to otherwise unassisted households is \$215 million per year in the high adoption scenario and \$54 million per year in the low adoption scenario.

6.2 Reduced Income Underreporting Fraud Due to Work Requirements

In some instances, work requirements may reduce income underreporting fraud by assisted tenants. Since the rent due from tenants in the affected programs is generally less if a tenant has less income, tenants may have an economic incentive to underreport income to their PHA/owner. A work requirement may cause some tenants who are underreporting to include income from work so that they meet the work requirement.

PHAs and owners use verification systems that make it difficult for tenants to underreport wage income that is captured by the verification systems. However, tenants with informal or under the table wage income may be able to underreport without detection. In these instances, the tenants that otherwise would have committed fraud would generally pay more in rent without necessarily adjusting their level of work. The additional rent paid by tenants represents an economic transfer from assisted tenants who otherwise would have committed fraud to the federal treasury or to the unassisted households who would benefit from the extra program revenue.

6.3 Exiting Housing Assistance Earlier Due to Work Requirements or Term Limit

PHAs or owners may choose to terminate the housing assistance of tenants who fail to meet a work requirement or reach the end of a term limit. Although the proposed rule would allow PHAs and owners to terminate assistance to beneficiaries who fail to comply with work requirements, evidence from MTW suggests PHAs and owners would be reluctant to sanction noncompliance with work requirements by ending assistance.

PHAs and owners that adopt term limits under this rule would more assuredly experience an increased rate of program exits. The number of non-elderly non-disabled families that were active in 2024, had been participating for at least five years (the length of the term limit in the adoption scenarios in this RIA), and receive assistance under PHAs and owners that would adopt term limits in the scenarios was 79,000 in the high scenario and 19,000 in the low scenario.⁴⁰ These figures reflect the expected number of families that would exit housing assistance earlier than they otherwise would have five years after PHAs and owners implement term limits under this rule.

In subsequent years, the projected number of families exiting early would be lower: 9,000 families per year in the high adoption scenario and 2,000 families per year in the low adoption

³⁹ In this estimation exercise, the projected number of additional employed individuals was converted to the projected number of households gaining an additional employed member using the average number of work eligible members per household with work eligible members in each scenario.

⁴⁰ See Table 5.

scenario.⁴¹ HUD assumes in this projection that the composition of new applicants would not change in response to the new term limit policies. However, the annual number of families exiting early would be lower if the term limits discourage non-elderly non-disabled households from applying for housing assistance, allowing more elderly and disabled households not subject to term limit to take their place.

Tenants whose housing assistance is terminated because of the new policies would potentially face costs beyond the value of the subsidy lost, including moving costs and the consequences of housing instability and eviction. Decreased housing stability would create negative externalities for communities as people that lose housing assistance would likely burden local public services more, especially if they fall into homelessness. These negative externalities could be offset by increased housing stability for the households that take the place of the tenants who exit housing assistance programs due to work requirements or term limits.⁴²

Transfer from Exiting Households to New Households

The subsidy lost by tenants who exit assisted housing programs would generally be transferred to other low-income households. In most places, public housing, HCV, and PBRA provide housing assistance to only a portion of eligible applicants. On average, households that apply for housing assistance wait two years before receiving it. The assistance made available by tenants exiting due to work requirements or term limits would become available to previously unassisted households.⁴³

The value of this economic transfer can be estimated using the projection of families exiting earlier than they otherwise would have (79,000 in the first year families reach the limits and 9,000 in each subsequent year under the high adoption scenario and 19,000 in the first year families reach the limits and 2,000 each subsequent year under the low adoption scenario) and

⁴¹ These estimates are based on recent years of HUD administrative data on the number of households that are in their 5th year of tenure and do not end participation in the assistance program. They do not include households beyond their 5th year of tenure because those households would have reached the end of the term limit in an earlier year.

⁴² Miller et al (2007) discusses some anecdotal data supporting HUD's expectation that some households would face hardships, including homelessness, upon reaching a term limit, but caveats the conclusions that can be made, stating, "because MTW was not designed to support rigorous examination of either the short- or longer-term effects of time limits on housing assistance recipients, there are significant limitations as to what is knowable and known from these experiences."

⁴³ Although most of the subsidy lost by families who exit early because of term limits would instead benefit previously unassisted households, not every dollar would benefit the new households due to any delay between the exiting family moving out (or losing assistance) and the new family moving into an assisted unit. In the project-based assisted housing covered by this rule, HUD expects that this delay would be minimal. For tenant-based HCV, the delay could be longer since the new household would have to find a unit in which to use the subsidy, but in these cases, the subsidy lost by the exiting family would remain unspent by the government until used by the new household.

the average amount of subsidy per household.⁴⁴ From the 2024 tenant data, non-elderly non-disabled tenants assisted for more than 5 years in the HCV and PBRA programs benefited from an average housing assistance payment of \$1,259 per month. The overall average monthly HUD expenditure per unit on public housing in 2024 was \$869.⁴⁵ The projected value of the transfer of one month of housing assistance from families exiting because of the term limits is, in the high adoption scenario, \$89 million from the families reaching the limit in the first year the term limits are binding and \$10 million from the families reaching the limit in each subsequent year, and in the low adoption scenario, \$22 million from the families reaching the limit in the first year the term limits are binding and \$3 million from the families reaching the limit in each subsequent year.

The housing assistance transferred from families that exit because of term limits would remain available for other families over many months after the family exits. To estimate the total value of the transfer (the subsidy the families that exited would have received absent the term limit), one must consider how long the family would have stayed without the term limit. Based on observed ends of participation in the HUD tenant data in 2022, 2023 and 2024, the average non-elderly non-disabled family that ended participation with a tenure over 5 years had a total tenure of 11.3 years (6.3 years over 5 years). Under the high adoption scenario, the total value of the transfer from families that exit in the first year term limits are binding is \$6.764 billion and the total value of the transfer from families that exit in subsequent years is \$766 million. Under the low adoption scenario, the total value of the transfer from families that exit in the first year term limits are binding is \$1.680 billion and the total value of the transfer from families that exit in subsequent years is \$224 million.

Costs from Increased Unit Turnover, New Admissions, and Moving Expenses

The increased rate of program exits due to work requirements and/or term limits would also result in costs to the PHAs and owners that adopt the policies and to landlords that house HCV recipients. The increased volume of new admissions each year resulting from increased exits would impose administrative costs on PHAs and owners that must process the admissions. There would also be increased unit turnover costs borne by the landlord of the unit vacated by the

⁴⁴ HUD notes that it assumes no more than *de minimis* exits due to noncompliance with work requirements, including both individuals who fail to meet the work requirement as well as individuals who work a satisfactory number of hours but fail to demonstrate compliance due to reporting errors or paperwork burdens. As mentioned in the first paragraph of section 6.3, HUD anticipates that PHAs and owners would be reluctant to sanction noncompliance with work requirements by ending assistance (and the proposed rule does not specify the consequences for not meeting a work requirement, leaving the decision to the PHA or Owner). HUD notes that even when termination of assistance was included in the work requirement policies of MTW agencies, HUD has found little evidence of it ever happening. HUD infers that this is due to the PHAs (whether in their written policies or in the manner they were implemented in practice) offering second chances and alternative means of compliance. HUD believes the MTW experience is more relevant here than Medicaid work requirements.

⁴⁵ Public housing subsidies are not disbursed as housing assistance payments on a per-family basis like in the HCV or PBRA programs, so this analysis uses the overall average per-unit subsidy as the value of the economic transfer from each family that exits public housing.

family that moves because of failing to meet a work requirement or reaching a term limit.⁴⁶

Table 7 shows the estimated increased new admission and unit turnover costs given the estimated number of program exits attributed to new term limit policies.

Table 7: Additional Annual Unit Turnover and New Admission Costs

First Year with Families Exiting Because of Term Limits						
Affected Entity	Event	Cost Per Tenant	Low Estimate		High Estimate	
			Tenants	Total	Tenants	Total
PHAs & Owners	New Admissions	\$257-\$534	18,800	\$4.8 million	78,700	\$42.0 million
	Unit Turnover	\$750-\$1,000	4,500	\$3.4 million	26,700	\$26.7 million
HCV Landlords	Unit Turnover	\$1,000-\$4,000	7,100	\$7.1 million	46,800	\$187.1 mil
Subsequent Years						
Affected Entity	Event	Cost Per Tenant	Low Estimate		High Estimate	
			Tenants	Total	Tenants	Total
PHAs & Owners	New Admissions	\$257-\$534	2,500	\$600,000	8,900	\$4.8 million
	Unit Turnover	\$750-\$1,000	600	\$500,000	3,000	\$3.0 million
HCV Landlords	Unit Turnover	\$1,000-\$4,000	900	\$900,000	5,300	\$21.2 million

The estimated cost of processing a new admission is based on Turnham et al.'s (2015, p.93) survey of administrative costs in the HCV program. Researchers found that the typical cost of determining eligibility and issuing a housing choice voucher was between \$257 and \$534 in 2013 (adjusted for inflation to 2025 using the Bureau of Labor Statistics' Consumer Price Index). The estimated cost of turning over a vacated unit is based on several apartment industry resources.⁴⁷ Costs for public housing and PBRA units will generally be lower than for HCV landlords because public housing and PBRA units often have waiting lists and do not need to market the unit like a private owner that had housed a tenant-based HCV holder does. Public housing and PBRA units also continue to receive some subsidy payment when vacant for a short time, unlike private units. Additionally, families that rent private units with vouchers can remain in their units after losing the voucher if they can pay the full rent without assistance. To project the unit turnover costs for HCV landlords, this analysis assumes that, out of HCV families losing assistance because of term limits, 10 percent remain in their units in the high cost estimate and 50 percent remain in their units in the low cost estimate.

Families who move because they lose housing assistance by reaching the end of a term limit would incur moving costs. The number of families incurring moving costs projected under the

⁴⁶ In public housing and PBRA, the landlord bearing these costs would be the PHA or owner adopting the work requirement or term limit. In HCV, unit turnover costs would be borne by private landlords, to the extent that families losing HCV assistance vacate their units. Work requirements or term limits that reduce landlords' expectation of the stability of tenants' receipt of HCV assistance could reduce the willingness of landlords to participate in the HCV program due to these costs.

⁴⁷ See Stahlman (2023) and Fletcher (2022).

adoption scenarios in this analysis is equal to the instances of unit turnover shown in Table 7 (73,500 in the first year and 8,300 in subsequent years under the high scenario and 11,600 in the first year and 1,500 in subsequent years under the low scenario). However, families moving because of term limits would not move when they would have exited the program absent the term limits. The net impact of the term limit in terms of household moving costs is the cost of the moves minus the time discounted cost savings from the future moves avoided. As described above, we assume that families who exit because of the 5-year term limit would have, on average, remained in the program 6.3 years beyond 5 years absent the term limit. We also assume each move costs the family \$900.⁴⁸ The total moving costs to the affected families in the first year families exit due to term limits, minus the costs of the avoided later moves would range between \$22.1 million under the high scenario and a 7 percent annual discount rate and \$1.7 million under the low scenario and a 3 percent annual discount rate. The total moving costs to the affected families in the subsequent years, minus the costs of the avoided later moves would range between \$2.5 million under the high scenario and a 7 percent annual discount rate and \$200,000 under the low scenario and a 3 percent annual discount rate.

7 Summary of Economic Impacts

Promulgation of this proposed rule would result in costs, benefits and transfers relative to the baseline scenario of the existing regulations.

7.1 Costs

Table 10 shows the additional costs HUD expects PHAs, PBRA owners, HCV landlords, and households exiting assistance to incur relative to the baseline of current regulations, given HUD’s expectation of PHA and PBRA owner activity under this proposed rule. Each PHA or PBRA owner that bears any cost from this rule would only do so by voluntarily adopting new policies. HUD expects that any PHA or owner adopting work requirements or term limits perceives a net benefit for itself.

Table 10: Annualized Aggregate Monetized Cost (10-year horizon)

Affected Entity	Cost	Low Estimate		High Estimate	
		3%	7%	3%	7%
PHAs and PBRA Owners	Implementation costs	\$0.09 million	\$0.11 million	\$18.0 million	\$17.9 million
PHAs and PBRA Owners	Administrative costs from increased churn; unit turnover costs	\$1.20 million	\$1.13 million	\$9.59 million	\$9.02 million

⁴⁸ This assumes that all moves are local and completed without hiring a moving company and includes a small truck rental of \$80, three people working 8 hours at \$22/hour, and \$300 of related expense. The average hourly wage of workers in “Transportation and Material Moving” Occupations (53-0000) is approximately \$22.45 according to the May 2023 BLS Occupational and Employment Statistics.

HCV Landlords	Unit turnover costs	\$1.05 million	\$0.98 million	\$26.10 million	\$24.56 million
Exiting Households	Moving costs	\$0.39 million	\$0.55 million	\$1.65 million	\$2.77 million
TOTAL		\$2.7 million	\$2.8 million	\$55.3 million	\$54.3 million

Work requirements and term limits enacted by PHAs and owners under this rule could also impose costs on assisted tenants and on surrounding communities. Assisted tenants who search for jobs and work more because of work requirements would face uncompensated job search costs and a more constrained choice of how they spend their time. These costs are offset by the benefits discussed below. Tenants who exit assisted housing earlier than they otherwise would have would face moving costs. Tenants exiting early would also lead to increased costs for surrounding communities through the consequences of increased housing instability and homelessness. However, these costs are offset by cost savings from improved housing outcomes of the low-income households gaining assistance. HUD is uncertain whether there would be a net cost or net cost savings. HUD also has not included administrative costs to the household associated with potential paperwork burdens needed to demonstrate compliance with work requirements. This is because HUD expects that PHAs and owners would generally accomplish this within the burden imposed by the existing annual reexamination process, which already requires verification of earned income, and that existing households will face no more than *de minimis* burdens associated with demonstrating compliance.

Benefits

HUD expects that work requirements and, to a lesser extent, term limits, would benefit the economy by correcting the labor supply distortion introduced by an income-based subsidized rent. HUD quantified the benefits based on the reduced labor supply found by Jacob and Ludwig (2012). The benefits range from \$30.9 million to \$129.5 million annually. These benefits represent the value of increased labor force participation by tenants who would otherwise not be employed or may be underemployed.

For assisted tenants, work requirements or term limits, when paired with supportive services as required by this proposed rule, would improve earning ability and self-sufficiency. In many cases, the benefits of these improvements for the affected household would outweigh the costs of searching for a job and forgoing other non-work activities. The new policies could also improve the welfare of affected tenants if they lack information about their ability to find a job or the full breadth of benefits that come from working, including improved self-worth, improved community networks, and increased disposable income. From HUD's estimate of additional employed individuals, the total increase in tenant income from working, after subtracting the increase in tenant rent payments, is \$501 million per year in the high adoption scenario and \$125

million per year in the low adoption scenario. The average household gaining an employed member would have an after-rent income increase of \$16,000 per year.⁴⁹

7.3 Transfers

Table 11 shows the economic transfers HUD expects would flow between tenants assisted in the baseline and families gaining assistance under this rule and the federal treasury. These transfers, in addition to the economic benefits discussed above, would be motivating factors for the PHAs and owners that would adopt work requirements and/or term limits, where they align with the mission and goals of the PHA or owner.

Table 11: Annualized Aggregate Monetized Transfer (10-year horizon)

Affected Entity	Transfer	Low Estimate		High Estimate	
		3%	7%	3%	7%
From assisted tenants to otherwise unassisted low-income households or the federal treasury	Assisted tenants would earn more and receive less subsidy. That subsidy would benefit otherwise unassisted households or remain unspent by the government.	\$53.7 mil	\$53.7 mil	\$214.9 mil	\$214.9 mil
	Vouchers and assisted units vacated by families who exit earlier because of term limits would benefit otherwise unassisted households.	\$13.0 mil	\$11.5 mil	\$50.5 mil	\$45.1 mil
TOTAL		\$66.7 mil	\$65.3 mil	\$265 mil	\$260 mil

In addition to the transfers in Table 11, work requirements would lead to a transfer from assisted tenants who otherwise would have fraudulently underreported income to unassisted low-income households or the federal treasury. HUD expects the magnitude of this transfer to be minor relative to the transfers in Table 11.

8 Conclusion

This rule expands the options available to PHAs and owners to allow them to adopt work requirements for work eligible individuals and term limits for non-elderly non-disabled families receiving housing assistance through the public housing, HCV, or PBRA program. HUD expects that some PHAs and owners will be motivated to adopt new policies to improve self-sufficiency among their program participants, give families on their waitlists an opportunity to access assistance, or comply with directives from State or local governments.

PHAs and owners that adopt new policies under this rule would incur implementation costs, but HUD expects that they would only choose to do so if they perceive a net benefit from adopting the policy. For assisted tenants subject to a PHA or owner’s work requirements or term limits,

⁴⁹ This estimate of increased income does not account for costs like forgone non-work time and other costs associated with work. The net impact on an affected household would equal the increase in earnings minus costs.

HUD expects increased employment and a reduction in income underreporting fraud, both of which would increase rental revenue from the affected tenants. HUD also expects an increased rate of program exits in PHAs or owners that adopt term limits, which would transfer assistance to new households and increase costs for housing providers.

Table 12: Summary of Annual Monetized Impacts

	Low Estimate		High Estimate	
	3%	7%	3%	7%
Costs	\$2.7 million	\$2.8 million	\$55.3 million	\$54.3 million
Benefits	\$30.9 million		\$129.5 million	
Transfers	\$66.7 mil	\$65.3 mil	\$265 mil	\$260 mil
<i>After-Rent Tenant Income Increase⁵⁰</i>	<i>\$125.4 million</i>		<i>\$501.3 million</i>	

⁵⁰ This estimate of increased income does not include other impacts on tenants such as forgone non-work time and any other costs associated with work. The net impact on an affected household would equal the increase in earnings minus costs.

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