

A NEW DEAL FOR YOUTH

May 1, 2026

Regulations Division
Office of the General Counsel
US Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, DC 20410-0500

Re: Proposed Rule, FR-6520-P-01 Establishing Flexibility for Implementation of Work Requirements and Term Limits

A New Deal for Youth (ND4Y) writes to oppose this proposed rule. ND4Y is a youth-led effort advocating for the creation of new systems, policies, investments, and structures that reimagine life for young people in America. Our membership comprises young people ages approximately 16-29. We oppose this new rule based on the experiences and insights of several of our members.

The HUD-proposed regulation allows PHAs and Owners to establish new requirements for individuals to continue receiving housing assistance. Among these requirements is the expectation to work up to 40 hours per week and to reapply for the benefit every two years.

However, these requirements are unrealistic because they do not take into account the different realities faced by many people who depend on this type of assistance. For example, it does not consider that some individuals lack a support system.

It also does not take into account the multiple factors that affect individuals who have not had access to a complete education, which makes their entry into the workforce more difficult. It is not simply about obtaining a job, but about being able to secure one that accepts individuals under these conditions of limited education, which already represents a significant barrier for people with educational or structural limitations.

In this sense, the requirements do not appear to be designed to support people in achieving stability or functionality within the labor market, but rather to ensure compliance with strict work requirements without adequately addressing the conditions that led them to need this assistance in the first place.

Additionally, the proposed time limits for assistance do not seem practical. While reassessments are reasonable, requiring individuals to reapply entirely after a set period can be a long and burdensome process. Existing systems, like Section 8, already implement periodic reviews and documentation updates without forcing people to restart the application process from scratch. Requiring full reapplication

could lead to eligible individuals losing assistance due to technicalities or delays unrelated to their actual need.

Two ND4Y members share their personal perspectives below.

- As a college student, I work internships and part-time gigs. It would be challenging for me to manage both a 40-hour work week and being a successful full-time student. I oppose this rule as it does not reflect how young adults like myself can build stability. For many adults, housing support can be what allows them to remain in school. PHAs and Owners should not be allowed to limit the duration for which students can be excluded from the definition of “work-eligible.”
- As a university student who receives benefits from the Nutritional Assistance Program (PAN), a local alternative to SNAP in Puerto Rico, and healthcare services through the public health insurance system, my personal and socioeconomic context influences how I interpret these requirements. The same applies to my mother’s situation.

In her case, accessing employment that meets the requirements for either part-time or full-time positions would likely be difficult, as she may not be selected due to the lack of formal educational credentials, such as a high school diploma.

Although alternative educational opportunities exist, such as modular programs, training options, or other educational pathways, these may involve additional costs or limitations in access, including transportation and availability, which can restrict participation. In her case, she has primarily functioned as a homemaker in recent years, which involves responsibilities that limit the available time to attend educational or training centers.

From this perspective, access to education and formal training does not depend solely on the availability of programs, but also on material and personal conditions that may enable or limit their full utilization.

Failing to consider the social issues and socio-structural barriers that exist between individuals and the expectations HUD would allow PHAs and Owners to impose may, in practice, further precarize people who are already living below the poverty line, rather than addressing their real needs or promoting their stability.

We urge you to consider our real-life experiences and the potential for harm this rule would cause to residents in targeted housing programs.

Respectfully submitted,

Members of A New Deal for Youth