

March 23, 2026

Dear Members of the Illinois General Assembly,

The undersigned organizations urge swift passage **SB 3084**¹, sponsored by Senator Ram Villavalam, to protect against federal efforts to punish low-income Illinois residents who rely upon federally subsidized rental housing for safe and stable homes at a time when other public benefits are under attack.

Federal Threats: On March 2, 2026, the U.S. Department of Housing and Urban Development (HUD) proposed a rule putting residents of Public Housing and households in Project-Based Section 8 units or using Housing Choice Vouchers at risk of losing their housing.²

When finalized, the federal rule will permit Public Housing Authorities (PHAs) and private owners to require up to a forty-hour work week with burdensome reporting requirements and no supportive services (e.g., transportation, child care, job training, etc.). At the same time, PHAs and owners could mandate that low-income residents lose their housing assistance after as little as two years, regardless of whether or not they are working, still need assistance, or would be homeless without this help.

HUD's actions are based upon a series of faulty assumptions and stereotypes. Despite HUD's statements to the contrary, national and Illinois data demonstrates that most non-disabled residents without young children and who live in federally subsidized rental housing are employed.³ However, because wages do not keep pace with housing costs and people often struggle to secure regular, full time employment, many of these tenants would be homeless without housing support. The majority of individuals in federally assisted housing who are not employed are older adults, caregivers and/or persons with disabilities.⁴

At the same time, cutting off housing assistance after only two years would be arbitrary and cruel. Rendering one family homeless to supposedly make room for another does

¹ HB 4377 (West) is parallel bill.

² 91 Fed. Reg. 10016 (March 2, 2026), U.S. Dep't. of Hous. and Urb. Dev., *Establishing Flexibility for the Implementation of Term Limits and Work Requirements*
<https://www.federalregister.gov/documents/2026/03/02/2026-04095/establishing-flexibility-for-implementation-of-work-requirements-and-term-limits>

³ A. Mazzara and B. Sard, Center on Budget and Policy Priorities, *Chart Book: Employment and Earnings for Households Receiving Federal Rental Assistance*,
<https://www.cbpp.org/research/chart-book-employment-and-earnings-for-households-receiving-federal-rental-assistance> (2018); Center on Budget and Policy Priorities, *Illinois Federal Rental Assistance Fact Sheet*, <https://www.cbpp.org/research/housing/federal-rental-assistance-fact-sheets#IL> (2025).

⁴ A. Greenlee and K. McClure, *Participation, Transition, and Length of Stay in Federal Housing Assistance Programs*, *Cityscape: A Journal of Policy Development and Research*, Vol. 28, No. 2 (2024), U.S. Dep't. of Hous. and Urb. Dev.: Office of Policy Dev. and Research.

nothing to respond to the affordable housing shortage in the United States. We need more affordable housing, not policies that try to put the blame on some of the most vulnerable among us for the inequities in our society.

This Rule's Impact on Illinois: Illinois' 105 public housing authorities and owners participating in the project-based Section 8 program assist more than 200,000 Illinois households, most of whom are seniors, families with children, or people with disabilities.⁵ Consistent with the national statistics, in Illinois, those individuals who can work do work but can't control the amount of hours they receive, or the wage amounts they earn.

Beyond the work requirement, if a two-year time limit was adopted uniformly across Illinois, approximately 153,400 people, including 73,400 children, would lose their homes, even if they still needed the housing and would be homeless without it.⁶

Opportunity to Not Compound Harms Caused by H.R. 1: HUD's proposal comes at a time when Illinois is also bracing for the financial and human impacts of H.R. 1. Many of the residents in federally subsidized rental housing are also recipients of SNAP and Medicaid and are already subject to work requirements or will be soon. The threatened termination of SNAP and/or Medicaid will further destabilize these households. Stable, affordable housing without unnecessary or counterproductive requirements is a key way to prevent a catastrophic increase in the number of unhoused residents in Illinois.

These programs would also burden housing providers, who are not equipped or skilled to administer these programs and would have to use their own administrative costs to do so. An arbitrary 2-year time limit will also undermine confidence by private landlords in the Housing Choice Voucher Program since landlords are generally the most interested in long-term tenants and predictable income streams.

Unlike the provisions in H.R. 1 which create mandates for states, the HUD proposal that SB 3084 is responding to is permissive, so it's within the power of the State of Illinois to not go along with this misguided and cruel policy.

Better Ways to Support Work and Promote the Need for More Affordable Housing: SB 3084 makes clear that PHAs and private owners can encourage participation in voluntary employment or job training programs if the program does not affect a family's eligibility for housing assistance. The federal Family Self-Sufficiency Program and community service requirements for residents would remain intact. Housing providers

⁵ Center on Budget and Policy Priorities, *Illinois Federal Rental Assistance Fact Sheet*.

⁶ W. Fischer and E. Gartland, Center on Budget and Policy Priorities, *Rental Assistance Time Limits Would Place More Than 3 Million People – Half Of Them Children – At Risk of Eviction and Homelessness*,

<https://www.cbpp.org/research/housing/rental-assistance-time-limits-would-place-more-than-3-million-people-half-of-them> (2025).

with existing work requirements are also allowed to continue those programs, as long as they follow longstanding federal law and rules with protections against loss of assistance.

The language in SB 3084 has been negotiated in collaboration with groups representing PHAs and federally subsidized housing owners who are either supportive or have no opposition to the bill language.

If the General Assembly does not pass this legislation in the spring 2026 session, the rule will likely go into effect before next year's session.

Therefore, we urge you to prioritize the passage of this legislation this session to prevent a serious crisis of homelessness in Illinois.

Sincerely,

(87 organizational signers as of March 17, 2026)

Abundant Housing Illinois
Access Living of Metropolitan Chicago
AIDS Foundation Chicago
Alliance to End Homelessness in Suburban Cook County
Altura Realty
Ascend Justice
Campaign Zero
Center for Disability & Elder Law
Center for Housing & Health
Central IL Services
Champaign-Urbana Tenant Union
Chicago Area Fair Housing Alliance
Chicago Coalition to End Homelessness
Chicago House and Social Service Agency
Chicago Housing Trust
Chicago Women in Trades
Citizen Action/Illinois
CJE SeniorLife
Comprehensive Behavioral Health Center of St. Clair County, Inc.
Connections for the Homeless
Cook County Health
CUrbanism Club
Deborah's Place
Disability Resource Center
EMMAUS
FamilyForward
Fulton County Housing Authority
Gateway Foundation

Greater Chicago Food Depository
H.O.M.E. DuPage, Inc
Habitat for Humanity Chicago
Health & Medicine Policy Research Group
Hesed House
HOME DuPage Inc
HOPE Fair Housing Center
Housing Action Illinois
Housing Forward
Housing Task Force
IEANEA
Illinois Public Health Institute
Illinois Valley Center for Independent Living
Impact for Equity
Interfaith Housing Development Corporation
James B. Moran Center for Youth Advocacy
JOLT Foundation
Jonathan's Housing
Journeys | The Road Home
Latino Policy Forum
Legal Action Chicago
Legal Council for Health Justice
LIFE Center for Independent Living
LUCHA
Madison County Urban League Inc
NAMI Chicago
NAMI Illinois
NAMI Northern Illinois
Neighbors for Affordable Housing
New Moms
Niles Township
North Suburban Legal Aid Clinic
North West Housing Partnership
Northside Action for Justice
ONENorthside
Open Communities
Phoenix Community Development Services
Public Action to Deliver Shelter, Inc. DBA Hesed House
Red Line Service
reject 2 rehab
Respond Now
Robert Cottingham Property Management Company
Rockford Housing Development Corporation
Regional Office of Education 26 Homeless Liaison
Shelter Care Ministries
Society of St. Vincent de Paul

South Suburban Housing Center
South Suburban PADS
Spanish Community Center
Springfield Housing Authority
Supportive Housing Providers Association (SHPA)
Tanzanian Community Association
The Harbour
The Inner Voice, Inc
The Network: Advocating Against Domestic Violence
The Resurrection Project
Tipping Point Consultancy
Trilogy
World Solutions LLC