



1350 I STREET NW
SUITE 700
WASHINGTON, DC 20005
202-588-5180
NWLC.ORG

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

Re: Comments in Response to Proposed Rule: Establishing Flexibility for Implementation of Work Requirements and Term Limits [HUD Docket No. FR-6520-P-01, RIN 2501-AE15]

The National Women's Law Center (NWLC) submits these comments in opposition to the Proposed Rule from the Department of Housing and Urban Development (HUD) that would allow work requirements and term limits for housing programs, published in the Federal Register on March 2, 2026.¹ We urge HUD to withdraw the Proposed Rule in its entirety.

Since 1972, NWLC has fought for gender justice—in the courts, in public policy, and in our society—working across the issues that are central to the lives of women and girls. NWLC advocates for improvement and enforcement of our nation's civil rights laws and public benefits programs, with a particular focus on the needs of women of color, LGBTQIA+ people, survivors of gender-based violence, and women with low incomes and their families. These communities would be particularly harmed by the Proposed Rule allowing public housing agencies (PHAs) and HUD-assisted owners to condition receipt of assistance on compliance with work reporting requirements, and to impose time limits on the receipt of benefits.

NWLC strongly opposes this proposal, as it will harm women and families by arbitrarily constraining their access to housing, and conditioning this access on completing burdensome administrative requirements while providing them no support to increase their economic security. Time limits on housing assistance ignore the realities of both the housing and labor markets in the United States, where millions of people struggle to find work that pays enough for them to afford market rent. Decades of research around work requirements has consistently shown that they do not increase stable employment.

¹ Establishing Flexibility for Implementation of Work Requirements and Term Limits, 91 Fed. Reg. 10016 (Mar. 2, 2026).

Women, particularly women of color, LGBTQIA+ people, older women, and women with disabilities, face both high barriers to stable, well-paying jobs and increased burdens in completing administrative requirements—as do survivors of gender-based violence, who already often see their housing access threatened. As such, the Proposed Rule will result in these groups disproportionately losing access to housing, increasing poverty and homelessness.

Because of this harm—and because the Proposed Rule runs counter to both HUD’s mission and its obligations under the Administrative Procedure Act—HUD should not proceed with this rulemaking. For the reasons detailed in the comments that follow, we urge HUD to withdraw the Proposed Rule and redirect its efforts to policies that will help make affordable housing more accessible for women and families across the country.

I. Work requirements and time limits do not further the Proposed Rule’s stated goals of promoting self-sufficiency or addressing the shortage of affordable housing—rendering HUD’s rulemaking arbitrary and capricious under the Administrative Procedure Act.

As HUD acknowledges in the Proposed Rule, it is statutorily mandated to pursue policies that “encourage families to move toward self-sufficiency”² and “assist States and political subdivisions of States to address the shortage of housing affordable to low-income families.”³ There is a well-established shortage of affordable housing throughout the United States, and housing assistance is a vital intervention that keeps families from experiencing homelessness. It defies belief that HUD’s proposal to eliminate housing benefits for families who cannot meet strict administrative requirements or on an inflexible time limit would in any way ameliorate this affordable housing shortage.

Research has consistently shown that work requirements and time limits in public benefits programs do not further either statutory goal, as they do not support program participants in overcoming barriers to stable, long-term employment and do not account for sector-wide employment practices that limit opportunity. Additionally, such policies have been shown to push people who meet eligibility requirements out of programs that provide assistance because the administrative requirements to document employment are overly burdensome.

A. Work requirements do not increase employment—instead, they punish people for broader economic conditions or cause eligible people to lose their benefits because administrative requirements are too burdensome, removing stabilizing supports that would have improved employment outcomes.

Work requirements in public benefits programs are not a new policy idea, although the scope of their application to public housing programs in the Proposed Rule is unprecedented. Work requirements have been attempted and evaluated in numerous contexts over decades with similar results each time: minimal if any effects on

² 42 U.S.C. 1437a(a)(2)(D).

³ 42 U.S.C. 1437(a)(1)(B).

employment outcomes but a steep loss in benefits, increasing poverty and hardship.⁴ Overall, most public benefits recipients who can work already do work, as they need the income to meet other basic needs; those who do not face significant barriers to employment, such as a dearth of available jobs in their community. Research has consistently shown that instituting work requirements does not increase employment rates because the requirements do not address the underlying challenges people face in securing employment.⁵

Conditioning housing benefits on employment is likely to be especially counterproductive, as stable housing significantly increases people's ability to hold down a job. Losing housing, conversely, can jeopardize current and future employment. Indeed, housing instability is extremely destabilizing to an entire family—and given existing waiting lists, housing benefits lost because of a temporary disruption in working hours are likely to be lost for years.⁶ Although HUD cites the existence of waiting lists as a reason to impose time limits and work requirements, ignoring the underlying reasons for housing insecurity will not improve economic outcomes for families who lose assistance or families who come off a waiting list, if they too are subject to the same harmful policies. As such, the Proposed Rule does nothing to address the shortage of housing affordable for low-income families as HUD is statutorily mandated to do.⁷

Evidence from work requirements implemented in the Supplemental Nutrition Assistance Program (SNAP) is instructive. Like housing assistance, SNAP is a means-tested program, meaning recipients have low incomes and are subject to the volatility of the low-wage labor market. Conditioning SNAP benefits on work hours does not increase effort in looking for work,⁸ but does cause recipients to lose access to benefits.⁹

The Proposed Rule would allow PHAs and HUD-assisted owners to impose work requirements of up to 40 hours per week—higher than the requirements applicable to SNAP, and likely to put many housing assistance recipients at risk of losing their benefits because of sector-wide employment practices. Low-wage work in sectors such as retail and food service typically involves highly variable and unpredictable hours that

⁴ See LaDonna Pavetti, *Evidence Doesn't Support Claims of Success of TANF Work Requirements*, CTR. ON BUDGET & POL'Y PRIORITIES (CBPP) (Apr. 3, 2018), <https://www.cbpp.org/research/evidence-doesnt-support-claims-of-success-of-tanf-work-requirements>.

⁵ Hilary Wething, *Work Requirements for Safety Net Programs Like SNAP and Medicaid*, ECON. POL'Y INST. (Jan. 24, 2025), <https://www.epi.org/publication/snap-medicaid-work-requirements/>.

⁶ See Sonya Acosta & Brianna Guerrero, *Long Waitlists for Housing Vouchers Show Pressing Unmet Need for Assistance*, CBPP (Oct. 6, 2021), <https://www.cbpp.org/research/housing/long-waitlists-for-housing-vouchers-show-pressing-unmet-need-for-assistance>.

⁷ 42 U.S.C. 1437(a)(1)(B).

⁸ See Lauren Bauer & Chloe East, *A Primer on SNAP Work Requirements*, HAMILTON PROJECT (Apr. 2025), https://www.hamiltonproject.org/wp-content/uploads/2023/10/20250407_THP_SNAPWorkRequirements_Paper.pdf.

⁹ Leighton Ku et al., *The Effects of SNAP Work Requirements in Reducing Participation and Benefits From 2013 to 2017*, 109 AM. J. PUBLIC HEALTH 1446-1451 (Oct. 2019), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6727315/>.

are controlled by employers, not employees.¹⁰ Particularly in the service sector, which employs 19% of workers overall but 38% of low-income workers,¹¹ even continuously employed workers experience dramatic shifts in their working hours.¹² Research shows that large shares of service workers would likely fail to meet strict work hours requirements because fewer hours are offered to them by employers periodically throughout the year, even if in some months they greatly exceed the hours requirement.¹³

Additionally, evidence from SNAP shows people lose benefits because they cannot meet burdensome administrative requirements, even though they may meet program requirements; in one study, one in eight participants lost benefits as a result of administrative issues, including not receiving required notices or insufficient time to return paperwork.¹⁴ Loss of benefits, whether caused by falling short of the hours requirements or missing paperwork, means a stabilizing force that would have increased the likelihood of finding steady employment is removed.

The body of research on SNAP work requirements also demonstrates that impacts are likely to be unevenly distributed across the recipient population. People with the least resources struggle most to complete administrative paperwork, putting them at risk of losing benefits regardless of whether they meet the work requirements or qualify for an exception.¹⁵ Similarly, those facing discrimination by race/ethnicity or disability status are more likely to lose benefits.¹⁶ Women make up two-thirds of the workers in the lowest paid jobs, meaning they especially face high job turnover,¹⁷ and are disproportionately represented in jobs with unstable hours that make it difficult to consistently meet work requirements.¹⁸

Research on work requirements in the Medicaid and Temporary Assistance for Needy Families (TANF) programs shows similar results. Where Medicaid work requirements have been studied, the vast majority of recipients were either working or qualified for an

¹⁰ Elizabeth Ananat et al., *Work requirements penalize workers in volatile occupations*, BROOKINGS INST. (May 22, 2025), <https://www.brookings.edu/articles/work-requirements-penalize-workers-in-volatile-occupations/>.

¹¹ *Id.*

¹² *Collateral Damage: Scheduling Challenges for Workers in Low-Paid Jobs and Their Consequences*, NAT'L WOMEN'S LAW CTR. (NWLC) (Dec. 2025), <https://nwlc.org/wp-content/uploads/2025/12/Collateral-Damage-Report-December-2025.pdf>.

¹³ Bauer & East, *supra* note 8.

¹⁴ Poonam Gupta et al., *Paperwork Burdens Cost One in Eight Working-Age SNAP Recipients Their Benefits in 2024*, URBAN INST. (Sept. 25, 2025), <https://www.urban.org/research/publication/paperwork-burdens-cost-one-eight-working-age-snap-recipients-their-benefits>.

¹⁵ Lelaine Bigelow et al., *Big, Beautiful Paperwork: Dismantling Programs That Help Women Work*, GEORGETOWN CTR. ON POVERTY & INEQUALITY (July 24, 2025), <https://www.georgetownpoverty.org/issues/big-beautiful-paperwork/>.

¹⁶ Erin Brantley et al., *Association of Work Requirements With Supplemental Nutrition Assistance Program Participation by Race/Ethnicity and Disability Status, 2013-2017*, 3 JAMA NETWORK OPEN (Jun. 26, 2020), <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2767673>.

¹⁷ *Gender Equity Advocates Are Housing Advocates*, OPPORTUNITY STARTS AT HOME (July 11, 2024), <https://www.opportunityhome.org/wp-content/uploads/2021/05/Gender-Equity-Advocates-1.pdf>.

¹⁸ Ananat, *supra* note 10.

exemption prior to the imposition of work requirements, with only a small share falling in neither camp.¹⁹ When Arkansas piloted Medicaid work requirements, for example, the policy did not produce any significant increase in employment, as recipients were either already working or highly motivated to find work because of financial pressures they were facing—but it did cause many eligible recipients to lose Medicaid because they could not meet the administrative burdens associated with the work requirements.²⁰ Those who lost coverage were unlikely to regain it, leaving them uninsured and at risk of detrimental health consequences as a result.²¹ Similarly, where work requirements were implemented in the TANF program, recipients were unlikely to find stable jobs, particularly the recipients with the most significant barriers to employment,²² leaving people with periods of joblessness that drove them into poverty.²³

B. Time limits on assistance ignore the realities of the labor and housing markets and do not advance self-sufficiency.

Families remain in housing assistance programs for extended periods not due to a lack of work effort, but because their wages are often too low to cover high (and rising) market rents. By forcing families off assistance without ensuring access to stable, affordable housing or adequately paid work, time limits risk increasing housing instability, evictions, and homelessness—outcomes that directly undermine HUD’s stated goal of promoting “policies that encourage families to move toward self-sufficiency.” In fact, research has shown that imposing time limits on rental assistance increases housing instability rather than alleviates it. For example, in one study, families who were offered only 18 months of rental assistance were twice as likely to be doubled up or homeless after three years compared to families who were offered ongoing, needs-based assistance.²⁴ In another instance, a locality moved away from a time limits policy and found participants were three times more likely to achieve self-sufficiency and exit the program if they were not subject to term limits.²⁵

¹⁹ Jennifer Tolbert et al., *Understanding the Intersection of Medicaid and Work: An Update*, KAISER FAMILY FOUND. (May 30, 2025), <https://www.kff.org/medicaid/issue-brief/understanding-the-intersection-of-medicaid-and-work-an-update>.

²⁰ See Laura Harker, *Pain But No Gain: Arkansas’ Failed Medicaid Work-Reporting Requirements Should Not Be a Model*, CBPP (Aug. 8, 2023), <https://www.cbpp.org/research/health/pain-but-no-gain-arkansas-failed-medicaid-work-reporting-requirements-should-not-be>.

²¹ *Id.*

²² See LaDonna Pavetti, *Work Requirements Don’t Cut Poverty, Evidence Shows*, CBPP (Jun. 7, 2016), <https://www.cbpp.org/research/test-workrequirements-dont-cut-poverty-evidence-shows>.

²³ LaDonna Pavetti & Ali Zane, *TANF Cash Assistance Helps Families, But Program Is Not the Success Some Claim*, CBPP (Aug. 2, 2021), <https://www.cbpp.org/research/income-security/tanf-cash-assistance-helps-families-but-program-is-not-the-success-some>.

²⁴ Daniel Gubits et al., *Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families*, U.S. DEP’T OF HOUSING & URBAN DEV. (Oct. 2016), <https://www.huduser.gov/portal/sites/default/files/pdf/Family-Options-Study-Full-Report.pdf>

²⁵ Dep’t of Policy, Innovation & Evaluation, *An Assessment Of the Housing Opportunity Program*, TACOMA HOUSING AUTHORITY (Nov. 22, 2021), <https://www.tacomahousing.org/wp-content/uploads/2022/02/An-Assessment-of-the-Housing-Opportunity-Program-2021-11-22.pdf>.

As noted above, the low-wage labor market is highly variable and inconsistent, meaning even if low-paid workers can meet a work hours requirement, they may not consistently make enough money to afford rent. To afford fair market rent for a one-bedroom apartment without spending more than 30% of income on housing, a full-time worker must be paid *on average* \$28.17/hour, and more in the many localities experiencing even higher housing costs.²⁶ Yet the federal minimum wage remains just \$7.25/hour, and nearly one in four workers—including 28% of all women workers, 32% of all Black workers, and 33% of all Latine workers—is paid less than \$17 per hour.²⁷ Therefore, for low-paid workers, loss of housing assistance would effectively mean eviction and homelessness.

C. The Proposed Rule fails to meet the requirements of the Administrative Procedure Act.

Because the weight of the evidence makes clear that the Proposed Rule will not advance—and in fact will undermine—the agency’s stated goals of improving self-sufficiency and access to affordable housing, HUD’s proposal “rests upon a factual premise that is unsupported by substantial evidence.”²⁸ Although the NPRM gestures to Moving to Work (MTW) demonstration projects that dramatically differ from the Proposed Rule itself,²⁹ this sparse record does not amount to evidence that broad work requirements and time limits, applied across the country in diverse contexts, will help rather than harm families.

By seeking to allow widespread imposition of work requirements and time limits beyond the limited context of MTW programs, imposing new and harsh obligations on families receiving assistance, HUD proposes a dramatic shift in longstanding policy without sufficient explanation of how these requirements will achieve its stated goals. In the Proposed Rule, HUD does not define what supportive services will be available to families, or require any provision be made for the lack of available jobs that pay family-sustaining wages; it ignores how this policy change will harm individuals and families—especially women and people of color, as detailed below—who will lose the assistance they depend on to keep a roof over their heads.

The Administrative Procedure Act (APA)³⁰ requires that an agency “examine the relevant data and articulate a satisfactory explanation for its action, including a ‘rational

²⁶ Esther Colón-Bermúdez, *Out of Reach: The High Cost of Housing*, NAT’L LOW INCOME HOUSING COALITION (2025), https://nlihc.org/sites/default/files/oor/2025_OOR_FullReport.pdf.

²⁷ Dr. Kaitlyn Henderson, *The Crisis of Low Wages: Who Earns Less Than \$17 an Hour in the U.S. in 2024?*, OXFAM AM. (July 9, 2024), <https://www.oxfamamerica.org/explore/research-publications/lowwagereport2024/>.

²⁸ *Genuine Parts Co. v. EPA*, 890 F.3d 304, 346 (D.C. Cir. 2018).

²⁹ Notably, HUD relies most strongly on a single study of 123 households at the Charlotte Housing Authority which combined a work requirement with intensive supportive services. The Proposed Rule does not define or fund such services.

³⁰ 5 U.S.C. §§ 551-559.

connection between the facts found and the choice made.”³¹ It also requires that an agency changing a settled position provide good reasons for the new policy and account for whether the prior rule has engendered “serious reliance interests” among affected parties.³² HUD has met none of these standards, ignoring both the relevant data and significant reliance interests in proposing a rule that will neither increase self-sufficiency nor expand access to affordable housing—but will increase evictions and homelessness, undermining families’ ability to provide for their own economic security, remain stably housed and care for dependent loved ones. The present rulemaking is therefore arbitrary and capricious under the APA.

II. Time limits and work requirements especially harm women and others facing multiple forms of discrimination.

Time limits and work requirements in public benefits programs do not increase stable employment, but do cause people to suffer cascading harm from losing benefits. It is important to note that these harms fall disproportionately on women, especially women of color, due to longstanding barriers in the labor market, including discrimination, harassment, and inadequate support—factors reflected in Black women’s unemployment rates consistently outpacing those for other groups.³³ Women—who are disproportionately represented in low-paid, part-time, and/or unstable jobs where hours fluctuate and documentation is difficult to obtain³⁴—will be hit particularly hard by time limits and work requirements that do not account for these volatile working conditions.³⁵ As discussed below, women also face discriminatory barriers to accessing safe and affordable housing. At the same time, racial discrimination in housing continues to restrict access to safe and affordable units, leaving many families of color with fewer options once assistance is withdrawn. Time limits and work requirements, therefore, reinforce existing disparities by penalizing those already facing the steepest barriers.

Women are also more likely to be managing care responsibilities for children and aging or disabled family members—roles that limit their capacity to meet rigid work requirements or increase earnings quickly. These responsibilities may make the required hours unattainable if it would mean leaving family members without care.³⁶

³¹ *Motor Vehicle Manufacturers’ Ass’n v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29, 43 (1983) (quoting *Burlington Truck Lines, Inc. v. United States*, 371 U.S. 156, 168 (1962)).

³² See *FDA v. Wages & White Lion Invs., LLC*, 145 S. Ct. 898, 916 (2025) (naming the “change-in-position” doctrine): “[a]gencies are free to change their existing policies as long as they provide a reasoned explanation for the change,” “display awareness that [they are] changing position,” and consider “serious reliance interests.” See also *Encino Motorcars, LLC v. Navarro*, 579 U. S. 211, 221–222 (2016) (quoting *FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 515 (2009)).

³³ *February Jobs Report: Black Women in Economic Turmoil*, NWLC (Mar. 6, 2026), <https://nwlc.org/press-release/february-jobs-report-black-women-in-economic-turmoil/>.

³⁴ Sandra Markowitz, *Part-Time Workers Are Paid Less, Have Less Access to Benefits—and Most Are Women*, NWLC (Dec. 11, 2025), <https://nwlc.org/resource/part-time-workers-factsheet/>.

³⁵ Ku, *supra* note 9.

³⁶ *Medicaid Work Reporting Requirements Would Harm Women’s and LGBTQ+ People’s Health and Economic Security to Fund Tax Breaks for the Rich*, NWLC (Feb. 6, 2025), <https://nwlc.org/resource/medicaid-work-reporting-requirements-would-harm-womens-and-lgbtq-peoples-health-and-economic-security-to-fund-tax-breaks-for-the-rich/>.

Because child care costs are high, and child care subsidy programs can cover only a fraction of income-eligible children,³⁷ low-income families may not be able to afford the child care necessary to meet hours requirements. Similarly, time-limited assistance forces impossible choices between maintaining housing stability and providing necessary care.

Although the Proposed Rule purports to exempt those with caregiving responsibilities from work requirements, the proposed parameters will not sufficiently address the scope of those responsibilities. As defined in the Proposed Rule, primary caregivers are limited to individuals who bear primary responsibility for the care for a dependent child under the age of six, of children or adults with disabilities in the tenant family, or of elderly or temporarily incapacitated individuals in the tenant family. This definition leaves out parents of elementary school-age children, who require significant care during traditional working hours. It also leaves out people caring for loved ones outside their immediate household, such as an aging relative who lives independently but needs care support, or a family member other than a parent caring for young children so a parent can work. It is undisputed that women are primarily shouldering these care responsibilities because of inadequate broader supports, so will be disproportionately impacted by these overly narrow exemptions for caregiving.³⁸ Even if they fall within a caregiving exemption, research has shown they may nonetheless lose benefits because of administrative burdens in establishing their eligibility for the exemption.³⁹ Furthermore, the Proposed Rule does not require any exemption to time limits for caregivers of children, including those under age six.

III. Women and survivors of gender-based violence face particular barriers to accessing affordable housing and will be particularly harmed by the Proposed Rule.

In addition to facing barriers to employment, women and survivors of gender-based violence face increased barriers to housing access, including discrimination and harassment, making access to housing assistance even more crucial. For example, women are more likely to face sexual harassment in housing, such as when a landlord asks a tenant to engage in sexual conduct as a condition of renting.⁴⁰ Although this conduct is illegal, it is a widespread and underreported problem jeopardizing access to housing in the private market. Women are also more likely to be affected by overly restrictive occupancy requirements that harm families with children, which have been shown to be particularly burdensome for women of color with low incomes.⁴¹

³⁷ *New 50 State Analysis Shows Impact of Federal Child Care Program*, FIRST FIVE YEARS FUND (May 11, 2023), <https://www.ffyf.org/resources/2023/05/new-50-state-analysis-shows-impact-of-federal-child-care-program>.

³⁸ See, e.g., Pavithra Mohan, *This Group of Women is Leaving the Labor Force—Again*, FAST COMPANY (Jan. 13, 2026), <https://www.fastcompany.com/91473068/this-group-of-women-is-leaving-the-labor-force-again>.

³⁹ See, e.g., Harker, *supra* note 20; Gupta, *supra* note 14.

⁴⁰ *Gender Equity*, *supra* note 17.

⁴¹ *Id.*

Survivors of gender-based violence face an acute and critical need for housing, as a lack of safe housing they can afford is a primary barrier to escaping abuse, which HUD itself has recognized.⁴² However, policies such as nuisance and “crime-free” ordinances can punish tenants experiencing abuse who make emergency calls, threatening their housing.⁴³ Critically-needed emergency transfers because of abusive situations are also routinely denied.⁴⁴

Because women and survivors of gender-based violence already face increased barriers to housing, additional barriers in the form of time limits or work requirements will predictably particularly harm them. Housing and employment barriers are mutually reinforcing: stable housing makes it possible for people to hold down a job and stable employment allows people to afford housing. Removing housing assistance when people need it most is therefore a compounding threat to economic security, and will have disproportionate impacts on groups who already face discriminatory barriers to both housing and employment.

* * *

For the foregoing reasons, NWLC urges HUD to immediately withdraw the Proposed Rule and instead dedicate its efforts to advancing policies that strengthen—rather than undermine—housing stability and economic security for women and families.

Please note that our comments include numerous citations to supporting research and relevant documents, including direct links for HUD’s benefit in reviewing our comments. We direct HUD to each of the studies or documents cited and made available to the agency through active hyperlinks, and we request that the full text of each of the items cited, along with the full text of our comments, be considered part of the administrative record in this matter for purposes of the Administrative Procedure Act.

Thank you for the opportunity to submit comments on the Proposed Rule. Please contact Amy Royce (aroyce@nwlc.org) with any questions or requests for information regarding the issues raised in these comments.

Sincerely,



Amy Royce
Senior Counsel, Income Security

⁴² See, e.g., U.S. DEP’T OF HOUS. & URBAN DEV., *Assessing Claims of Housing Discrimination against Victims of Domestic Violence under the Fair Housing Act (FHAAct) and the Violence Against Women Act (VAWA)* (Feb. 9, 2011), <https://www.hud.gov/sites/documents/FHEODOMESTICVIOLGUIDENG.PDF>.

⁴³ See U.S. DEP’T OF HOUSING & URBAN DEVELOPMENT, *Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Enforcement of Local Nuisance and Crime-Free Housing Ordinances Against Victims of Domestic Violence, Other Crime Victims, and Others Who Require Police or Emergency Services* (2016), <https://www.hud.gov/sites/documents/FINALNUISANCEORDGDNCE.PDF>.

⁴⁴ *Gender Equity*, *supra* note 17.