



April 27, 2026

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

**RE: Docket No. [FR-6529-I-01], Revocation of the 30-Day Notification Requirement Prior To Termination of Lease for Nonpayment of Rent**

Thank you for the opportunity to comment on HUD’s February 26 proposed rule, “Revocation of the 30-Day Notification Requirement Prior to Termination of Lease for Nonpayment of Rent,” which would revoke HUD’s current 30-day notification requirement to HUD-assisted residents prior to lease terminations for nonpayment of rent.

On behalf of our membership of mission-driven senior housing and other aging services providers, we urge HUD to withdraw the proposed rule. Given the high risk of homelessness among older adults, we support the continuation of the current eviction notification requirements, which create programmatic consistency for housing providers across various HUD compliance frameworks and protect HUD-assisted households at risk of housing instability.

As outlined in [LeadingAge’s 2024 comments](#) to the agency, we continue to urge HUD to take further steps to promote housing stability and prevent rent arrears among HUD-assisted households, including by collecting and maintaining data related to evictions among HUD-assisted households.

**About LeadingAge**

We represent more than 5,300 nonprofit and mission-driven aging services providers serving older adults and touching millions of lives every day. From our national headquarters in Washington, DC, and in collaboration with our state partners representing members active in 50 states, the District of Columbia, and Puerto Rico, we use advocacy, education, applied research, and community-building to make America a better place to grow old. Our membership encompasses the entire continuum of aging services, including skilled nursing, assisted living, memory care, affordable housing, retirement communities, adult day programs, hospice, Programs of All-Inclusive Care for the Elderly (PACE), and home-based care. We bring together the most inventive minds in the field to lead and innovate solutions that support older adults wherever they call home. For more information, visit [leadingage.org](https://www.leadingage.org).

**Improving Housing Stability**

There is a severe shortage of affordable housing for older adults with very low incomes. According to a data<sup>i</sup> from the Joint Center for Housing Studies (JCHS) at Harvard University, a record number of 22.4 million renter households spent more than 30% of their income for housing—and 12.1 million renter households spent more than 50%—for rent in 2022. Additional reporting by JCHS<sup>ii</sup> in December 2023 found that Housing cost burdens become more and more common as people age.

This is a critical time for additional housing stability protections for older adults with low incomes. Under the current rule, when tenants residing in public housing or in properties receiving project-based rental assistance (PBRA) face eviction for nonpayment of rent, housing providers would need to provide those tenants with written notification at least 30 days prior to the commencement of a formal judicial eviction procedure for lease termination.

HUD's data, cited in the agency's [2024 rulemaking](#) formalizing the 30-day notification requirement, shows that eviction notification is highly effective at reducing unit turnover and preventing eviction due to non-payment. Tenants who were given more notice were more likely to pay the rent owed and remain housed. Further, despite the ongoing affordable housing crisis, HUD does not currently collect eviction data, even for its own subsidized programs. We strongly urge HUD to not only maintain a strong and consistent eviction notification requirement, but also to launch a nationwide prevention and data collection program related to evictions.

### **Reducing Costs and Confusion among Housing Providers**

Higher rates of termination are not just harmful for tenants, but also costly for housing providers. Unit turnover is extremely costly for housing providers, with LeadingAge members reporting in early 2026 an average cost of \$10,000-14,000 per turn, not including legal fees associated with eviction proceedings. When housing providers give ample notice to tenants related to lease termination for non-payment of rent, tenants are better able to seek payment assistance. To streamline termination processes and increase the likelihood of payment while reducing costs associated with unit turn-overs, we urge HUD to withdraw the proposed rule and maintain the current 30-day notification period.

In addition, housing providers incur costs related to navigating inconsistent and unclear compliance requirements. Without the 30-day notification requirement, housing providers participating in HUD's project-based rental assistance programs will need to comply with a confusing and contradictory set of rules regarding eviction notification based partly on the HUD lease and partly on the HUD handbook and Code of Federal Regulations, which set forth different requirements. Housing organizations that operate communities in multiple states will also need to comply with differing sets of rules depending on state and local law, contributing to the patchwork of requirements. Further, HUD continues to require 30-day notifications for other types of lease violations in certain Multifamily Housing programs, adding to the confusion related to terminations and notifications. LeadingAge therefore recommends the continued alignment of notification requirements across HUD rental assistance programs.

Again, thank you for the opportunity to comment. We look forward to working together to both improve housing stability for older adults with low incomes and to advance clear and consistent policies for housing providers.

Please address any questions to Juliana Bilowich ([jbilowich@leadingage.org](mailto:jbilowich@leadingage.org)).

Sincerely,

Juliana Bilowich  
LeadingAge

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<sup>i</sup> America's Rental Housing 2024: <https://leadingage.org/renters-cost-burdened-at-record-levels/>

<sup>ii</sup> Housing America's Older Adults 2023: <https://leadingage.org/report-housing-cost-burdens-at-all-time-high/>