

The Honorable Sandra Thompson  
Federal Housing Finance Agency  
Washington, D.C.

Director Thompson,

Thank you for the opportunity to provide feedback on the FHFA Request for Information on tenant protections.

My name is Cassandra Artukovich. I am both a tenant in Garden City, Idaho and the Operations Manager for **Jesse Tree**, an eviction and homelessness prevention nonprofit. I am writing to share my experience and knowledge working with populations desperate to stay out of the shelter system and to urge FHFA to take meaningful action to create transparent, effective, and enforceable renter protections for households living in rental properties with federally backed mortgages.

Regardless of what state you look at, there is a notable power imbalance present between landlords and renters. Adding personalities, values, and religion to the mix only complicates the difficulty all states face to protect both parties to ensure rights are being protected. No matter how much a landlord has invested in a property, the tenant(s) will always be the human being in the equation facing greater risk of housing instability, harassment, and homelessness.

It is FHFA's opportunity to promote tenant resiliency by creating new renter protections for households living in properties with federally backed mortgages, including:

1. **Source of income protections** to prohibit landlords from discriminating against households receiving rental housing assistance such as Section 8 Housing Choice Vouchers, or Supplemental Security Income (SSI), or local rental assistance, so that families can have greater choice about where to live.
  - a. A real-life example of this is my own partner, who receives necessary disability benefits. His receipt of that much-needed support has severely hindered where my partner and I can afford to live together as an unmarried couple since the beginning of our relationship ten years ago. I have ten years worth of stories of experiencing income discrimination firsthand while supporting a person I deeply love and cherish, who understandably internalizes that discrimination that is thrown at them so frequently and carelessly in so many other facets of society. What needs to be realized is that it is a mortifying and humiliating experience to be told you cannot live in a place you can

financially afford simply because your partner is on a fixed income instead of standard employment.

2. **“Just cause” eviction standards**, which limit the causes for which a landlord can evict a tenant or refuse to renew a tenant’s lease when the tenant is not at fault or in violation of any law.
  - a. As the Operations Manager of Jesse Tree, I have personally supported tenants who have walked into our lobby, hysterically sobbing, holding a 30-day notice of lease non-renewal. It is so often that we hear the notice was administered shortly after the tenant has made requests for basic repairs. Since a 30-day notice of lease non-renewal is not considered a legal eviction, these tenants’ entire lives are completely and suddenly upheaved with vague justifications from their landlord that often lead to months of couch-surfing and doubling up to stay out of the shelter system, exhausting all of their social supports in the hopes that those relationships don’t deteriorate before they can financially afford to pay off any utility debt from their previous unit, a security deposit and first month’s rent, and the cost of moving. This goes beyond a “one-off” scenario; this is a repeated pattern that I am positive any eviction prevention program across the entire United States would be able to tell you in exhaustive detail.
3. **Rent gouging protections** to stop landlords from dramatically and unreasonably raising rents.
  - a. At the beginning of the COVID-19 pandemic, Idaho’s elder population was (to our horror) uniquely affected by rent increases. We heard from countless elders calling Jesse Tree’s Tenant Resource Center, panicking because they’d lived in the same rental unit for ten years and suddenly were looking at a 300% rent increase they knew they couldn’t afford and struggling to understand what their rights were. They were scared and in absolute disbelief that there were no legal protections in place for them. When they called around and found out most assisted living facilities, senior living complexes and low-income housing units were completely full and had a two-year minimum wait list, those elders were paralyzed by their shock and despair. In the following months, Idaho’s shelters were soon seeing elders being dropped off at their door straight from the local hospitals; their medical needs forced them to choose between housing and survival, with the check needed to pay for their every need coming the same day, in the same amount that was never quite enough to meet all their needs in the first place.
4. **Requirements to ensure housing is safe, decent, accessible, and healthy** for renters and their families.
  - a. In the state of Idaho, renters are still obligated to pay rent if their toilet doesn’t flush, their roof is leaking, their floors have holes, even if their

front door is unlockable. There are landlords who expect their tenants to foot the bill to improve the rental property, whether that means improving curb appeal or handling any and all plumbing issues regardless of how it may impact the tenant's quality of life. Again, we see so often that elders are the demographic most neglected when it comes to tenant protections; what should they do when they notify a landlord of needed repairs and are then disregarded, forcing them to live without running water to wash their dishes or flushable toilets to dispose of their waste while they are still legally obligated to pay their monthly rent?

I have seen firsthand what happens in communities without strong, enforceable tenant protections.

We urge FHFA to take bold action to implement mandatory, standardized protections—paired with strong enforcement—for all households living in properties with federally backed mortgages, including larger developments and smaller properties.

FHFA must continue to engage tenants and directly impacted people through its process of establishing and implementing renter protections, and protections must be centered on racial and social equity as explicit goals.

These protections—along with large-scale, sustained investments and reforms—are necessary to ensure that everyone, including the lowest-income and most marginalized renters, have a safe, quality, affordable, and accessible place to call home.

Sincerely,

Cassandra Artukovich  
Jesse Tree