

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

Director Thompson,

Thank you for the opportunity to provide feedback on the Federal Housing Finance Agency (FHFA) Request for Information on tenant protections. My name is Chelsea Ross, and I am the Interim Executive Director with the nonprofit organization, Partnership for Strong Communities (PSC). PSC leads advocacy, advances original research, and brings together the coalitions needed to drive systemic change towards our shared vision that everyone in Connecticut has a safe, stable home, that is affordable to them, in an equitable community of their choice.

I am writing to urge FHFA to take bold action to create clear, strong, and enforceable renter protections for households living in rental properties with federally backed mortgages. Given the broad reach of FHFA's work, any renter protections created by FHFA should cover a significant share of renters across the nation and put America on a pathway towards stronger protections for all renters.

Federal renter protections are critically needed to address the power imbalance between landlords and renters that puts renters at greater risk of housing instability, harassment, and homelessness and fuels racial and gender inequity.

**To help ensure greater housing stability, FHFA should create 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.
- 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.
- 3. Rent gouging protections** to stop landlords from dramatically and unreasonably raising rents.
- 4. Requirements to ensure housing is safe, decent, accessible, and healthy** for renters and their families.

Connecticut’s rental market is out of balance, and low-income renters are bearing the cost. Rents have increased 24% since 2017 resulting in evictions occurring at higher rates than pre-pandemic averages.<sup>1</sup> This past Valentine’s Day had the most eviction filings per day (215) since the court began keeping comprehensive electronic records in 2017.<sup>2</sup> Renter income has not

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<sup>1</sup> <https://www.apartmentlist.com/research/category/data-rent-estimates>

<sup>2</sup> <https://ctmirror.org/2023/02/16/ct-affordable-housing-lamont-budget-money/>

increased at the same pace as skyrocketing rents, putting especially low-income renters at a distinct disadvantage and at high risk of housing instability, eviction, and homelessness.

Research demonstrates that once median rent surpasses 30% of an area's median income, the rate of homelessness begins to increase more rapidly. Fairfield County has already surpassed that threshold with median rent costing 32% of median income.<sup>3</sup> 52% of CT renters are housing cost-burdened, meaning they spend more than 30% of their gross monthly income on rent. Black families, undocumented families, seniors, and people with disabilities disproportionately experience housing cost-burden in our state.

CT launched a Right to Counsel program in 2022 that one year later has enabled 71% of residents who utilized the program to avoid an involuntary move and has helped prevent over 76% of eviction filings for tenants in the state.<sup>4</sup> Being able to expand on this program to reach even more CT residents is a critical tool in helping to keep people stably housed as safe and affordable housing continues to be out of reach for many.

With stronger federal protections in place, advocates and local leaders are better supported in efforts to expand protections for renters at the state and local levels.

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 throughout 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 to large-scale, sustained investments and anti-racist 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,

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Partnership for Strong Communities  
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<sup>3</sup> County level median rent figures taken from <https://www.zillow.com/research/data/>. Median income figures from <https://www.census.gov/quickfacts/fact/table/fairfieldcountyconnecticut,CT/PST045221>

<sup>4</sup> <https://nlihc.org/resource/report-shows-connecticuts-right-counsel-program-be-effective-preventing-evictions>