



community alliance of tenants

July 10, 2023

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 Kim McCarty and I am the executive director of the Community Alliance of Tenants (CAT). We are Oregon's only statewide, grassroots, tenant-controlled, tenant-rights organization with the goal of educating and empowering tenants to demand safe, stable, and affordable rental homes. We believe that housing is the basis of a strong community. So we bring tenants together to organize and collectively advocate for fair and equal protections in housing practices and policies.

We write to share our experience and 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, Supplemental Security Income (SSI), or local rental assistance, so 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.

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

A 2022 [report](#) published by the U.S. Department of Housing and Urban Development found that Oregon has one of the highest rates of homelessness in the country. The report found that 62% of the homeless population in Oregon are in unsheltered locations. Additionally, Oregon had one of the largest increases in



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homelessness of individuals, families with children, and veterans from 2020-2022, creating an unprecedented housing crisis and an immediate need for affordable, safe, and accessible housing.

The Oregon Legislature recently passed Senate Bill 611 which caps annual rent increases at 10%, replacing a previous law that capped annual rent increases at 7% plus inflation. However, the previous law did not account for massive inflation last year and some tenants saw their rent increase to almost 15%. These heavy rate increases disproportionately impact those on fixed incomes, typically older adults and those on Social Security Disability.

The housing crisis was exacerbated by the COVID-19 pandemic but renters are still in trouble. A Portland State University Homelessness Research & Action Collaborative [report](#) found in 2021 that 89,000 Oregon households owed back rent and that 200,000 households had little to no confidence in their ability to pay their rent the next month. Another [report](#) found that Black, Indigenous, and People of Color struggle with housing insecurity, putting these populations at higher risk for eviction and homelessness. Additionally, more than half of renters cut back on necessities like food and medication or withdrew from their savings to pay rent. The lack of tenant protections burdens renters, taxpayers, and social services that support those experiencing housing insecurity.

While the passage of SB 611 is a step in the right direction, there is still a tremendous shortage of affordable, safe, and accessible housing options for Oregonians. Unfortunately, the housing crisis is not only an Oregon problem. Tenants across the country are in desperate need of broad, federally-backed housing initiatives that protect renters and their families and prevent the housing crisis from worsening.

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 those directly impacted throughout its process of establishing and implementing renter protections. Furthermore, protections must be centered on racial and social equity as explicit goals. These protections– along with 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,

Kim McCarty
Executive Director
Community Alliance of Tenants