



July 25, 2023

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

Dear Director Thompson:

I appreciate the chance to respond to the Federal Housing Finance Agency's (FHFA) request for tenant protection feedback. As the Director of Alliance for Housing and Healing, a division of APLA Health & Wellness, I've seen firsthand the need for robust renter protections in federally backed mortgage properties.

Our work includes providing housing services to HIV+ individuals and their families, and we have faced challenges due to the lack of sufficient renter protections. The power imbalance between landlords and tenants often leads to housing instability, harassment, and homelessness, which is why I'm urging the FHFA to implement comprehensive, enforceable tenant protections.

We serve a highly vulnerable HIV+ and homeless population in Los Angeles County. We have been able to provide some of these clients with HOPWA TBRA certificates. However, without sufficient affordable housing, our clients are having to compete with other potential tenants that do not need any subsidy. Landlords are more willing to rent out a unit to someone who has a job and is not receiving any subsidy. Many of these clients are unable to find housing and we need to ask the local housing authority for an extension on their certificates. It takes months, and sometimes a year to find housing.

Housing is a critical social determinant of health that can significantly impact HIV transmission rates. Research shows that housing instability is a significant barrier to HIV care and is associated with higher rates of behaviors that may increase the chance of getting or transmitting HIV, such as substance use and condomless sex. People with HIV experiencing homelessness are also at higher risk of poor health outcomes, including increased morbidity and mortality^{1 2}. Housing instability can also disproportionately affect certain populations, such as those with low income, limited transportation access, and other social vulnerabilities. Therefore, providing stable housing can be an effective strategy for

¹ <https://www.cdc.gov/hiv/policies/data/role-of-housing-in-ending-the-hiv-epidemic.html>

² <https://ryanwhite.hrsa.gov/sites/default/files/ryanwhite/grants/joint-cdc-hud-hrsa-hiv-outbreak-letter-508.pdf>





reducing HIV transmission rates and improving health outcomes for people living with HIV³. Providing enhanced renter protections will further our goal of reducing HIV infections and improving the health of our community.

Key renter protections we recommend include:

1. Income source protections to stop discrimination against households receiving rental assistance.
2. "Just cause" eviction norms, preventing arbitrary evictions.
3. Safeguards against rent gouging.
4. Requirements ensuring rental properties are safe, suitable, accessible, and healthy.

Our vulnerable clients, despite receiving HOPWA TBRA certificates, struggle to find affordable housing due to competition and landlord bias. Thus, these protections are crucial to level the playing field.

We call on FHFA to establish mandatory tenant protections, with strong enforcement, for all tenants in federally backed mortgage properties. Tenant engagement and racial and social equity should be at the heart of these protections. With concerted effort and reforms, we can assure all renters, particularly the marginalized and low-income, a safe and affordable home.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terry D. Goddard II'.

Terry D. Goddard II
Director, Alliance for Housing and Healing

³ <https://targethiv.org/sites/default/files/supporting-files/Housing%20and%20HIV%20Health%20Outcomes%20Final.pdf>

