

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 protection. My name is Therese Zmina and I am an employee in the family shelter and volunteer in the adult shelter at the Ecumenical Shelter Network of Lake County dba Project Hope for the Homeless. We are the only homeless shelter in Lake County, Ohio and serve up to 50 individuals every night.

I am writing to share my 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 essential to addressing the power imbalance between landlords and renters that increase the risk of housing instability, harassment, and homelessness.

To help ensure greater housing stability, FHFA should create new renter protection 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" evictions 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 raising rents.
4. Requirements to ensure housing is safe, decent, accessible, and healthy for renters and their families.

I have seen what happens in communities without strong, enforceable tenant protections. The stories I hear from guests at the homeless shelter confirm the need for these protections to reduce the occurrence of preventable homelessness and to improve the availability of low income and subsidized housing. Some of the stories from families I have worked with include a mom with two small children living in section 8 housing where a water leak in the apartment above caused part of her ceiling to collapse. The landlord ignored multiple requests for repair and mold began to grow on the ceiling and the walls. The children began to experience respiratory problems and still the landlord ignored the request. Finally, the landlord told her that since she was Section 8, she was last on the list for any repairs. She left the apartment because of the hazardous situation and moved into our family shelter. Another mom was "evicted" because the landlord's son wanted to move in. She was given 30 days to leave and could not find any affordable housing, so she moved into the family shelter.

When our guests at the shelter search for affordable housing, the challenges are enormous. Very few landlords accept Section 8. Currently, in all of Lake County Ohio, there is 1 apartment available that accepts Section 8 funding! It has 1 bedroom for \$900 per month plus all utilities paid by the renter. The wait list for a Section 8 housing voucher is closed because the list is so long, and the available housing is so scarce. This needs to be addressed.

Our community desperately needs safe, affordable housing. Vouchers are useless if no landlord will accept them and those that do accept Section 8 vouchers do not maintain their properties.

I urge FHFA to take bold action to implement mandatory, standardized protections and strong enforcement for all households living in properties with federally backed mortgages or federally subsidized rent, including large developments and smaller properties and out of state absent landlords. FHFA must continue to engage tenants and people directly impacted by this situation throughout its process of establishing and implementing renter protection.

These protections along with large-scale, sustained investments in affordable housing options 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. No one should be without a home or suffer abuse and neglect from a landlord in a country such as the United States.

We are counting on FHFA to make a difference for our vulnerable neighbors.

Sincerely,

Therese Zmina

Project Hope for the Homeless