

Federal Housing Finance Agency
400 7th St SW, Washington, D.C. 20024

Re: Federal Housing Finance Agency Tenant Protections for Enterprise-Backed Multifamily Properties Request for Input

Dear Director Thompson and colleagues:

We, the undersigned academic scholars, believe the Federal Housing Finance Agency (FHFA) should use its influence over the multifamily housing market to keep people housed and foster an economy that works for everyone. We urge the federal government to pursue bold tenant protections and rent regulations for the over 12 million renters living in properties with federally-backed mortgages.

Median rents in the U.S. have risen nearly 20% in the last two years alone, and in every corner of the United States, renters are struggling to stay safely housed.^{1,2} Over a century of federal policymaking has helped create and prop up a real estate market that disproportionately harms Black and brown renters.^{3,4,5,6} And concurrent catastrophes – including the climate crisis, COVID-19 pandemic, and financial crises – make it even harder to be a renter in America.^{7,8,9} In our respective academic fields, countless research studies paint a clear picture of the impact of an unregulated housing market: rents go up, families get evicted, homelessness rises, and people’s health and economic well-being decline.^{10,11,12,13} As teachers and mentors, we have also seen how housing insecurity impacts students’ ability to learn and thrive.

Safe and affordable housing is necessary for a person’s basic health and well-being, as well as for the larger economy and existence of a healthy democracy. With this in mind, we recommend that the FHFA consider the following set of tenant protections, which have strong empirical backing:

¹ Veiga, Alex. March 2023. “US rent growth easing, but remains a burden for many tenants.” *Associated Press*.

² National Low Income Housing Coalition. March 2023. “The Gap: A Shortage of Affordable Rental Homes.”

³ Taylor, Keeanga-Yamahatta. *Race for Profit: How Banks and the Real Estate Industry Undermined Black Homeownership*. University of North Carolina Press, 2019.

⁴ Rothstein, Richard. 2017. *The Color of Law: A Forgotten History of How Our Government Segregated America*. Economic Policy Institute.

⁵ Baradaran, Mehrsa. 2017. *The Color of Money: Black Banks and the Racial Wealth Gap*. Belknap Press.

⁶ Massey, Douglas, and Nancy Denton. 1998. *American Apartheid*.

⁷ Michener, Jamila. March 2022. “Race, power and policy: understanding state anti-eviction policies during COVID-19.” *Policy and Society*, Vol. 41: 2, pp. 231.246.

⁸ Immergluck, Dan. August 2015. *Preventing the Next Mortgage Crisis: The Meltdown, the Federal Response, and the Future of Housing in America*. Roman & Littlefield Publishers.

⁹ Rice, Jennifer, Daniel Aldana Cohen, Joshua Long, Jason Jurjevich. 2019. Contradictions of the Climate-Friendly City: New Perspectives on Eco-Gentrification and Housing Justice. *International Journal of Urban and Regional Research*.

¹⁰ Desmond, Matthew. 2016. *Evicted: Poverty and Profit in the American City*. Crown Publishers.

¹¹ Hatch, Megan E., and Jinhee Yun. 2020. “Losing Your Home Is Bad for Your Health: Short and Medium-Term Health Effects of Eviction on Young Adults.”

¹² U.S. Government Accountability Office. August 2020. “How COVID-19 Could Aggravate the Homelessness Crisis?”

¹³ Roy, Ananya and Chloe Rosenstock. December 2021. “We Do Not Forget: Stolen Lives of LA’s Unhoused During the COVID-19 Pandemic.” *UCLA Luskin Institute on Inequality and Democracy*.

1. Issue universal rent regulations that protect tenants from and limit egregious rent hikes;
2. Condition federally-backed mortgages on good cause eviction and ensure tenants have a right to renew their leases;
3. Ban housing voucher discrimination and enforce fair housing laws that prohibit housing discrimination more broadly;
4. Establish habitability standards and ensure landlords keep their properties in safe, accessible conditions; and
5. Ensure tenants have the right to organize without retaliation from their landlords.

We also urge the FHFA to prioritize tenant perspectives in any decision-making process that results from this RFI process. An inadequate patchwork of renter protections in the housing market creates an unfair power imbalance that allows landlords to take advantage of renters. It is of the utmost importance that the federal government center the needs of tenants to redress past harms, deliver meaningful protections for the most vulnerable among us, and help restore tenants' faith in the government.

Thank you for issuing a Request for Information (RFI) on the urgent issue of renter protections, and for your attention to this matter. We welcome the opportunity for further dialogue on this important topic.

Sincerely,

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