

July 31, 2023

The Honorable Sandra Thompson  
Director, Federal Housing Finance Agency  
451 7th Street, S.W., Washington, DC 20410

Dear Director Thompson,

Thank you for the opportunity to respond to your Request for Input (RFI) on how the Federal Housing Finance Agency (FHFA), in its oversight of Fannie Mae and Freddie Mac, can best provide affordable housing opportunities for renters across the country. The Institute of Real Estate Management (IREM®) is an international community of real estate managers dedicated to ethical business practices, maximizing the value of investment real estate, and promoting superior management through education and information sharing. IREM members manage 60% of federally subsidized and public housing.

As the FHFA examines ways to improve access to affordable housing, it is critical for FHFA to acknowledge the greatest driver of housing unaffordability is the limited supply of available housing. According to recent data, the United States has an underproduction gap of over 5.5 million units – a key underlying factor to why the cost of housing has increased. On top of this, inflation has increased the costs for goods and services for all Americans. As housing providers strive to provide affordable housing opportunities in their communities, they also contend with rising mortgage rates, and increased costs for supplies, services, and maintenance. When inflation is high, the costs of materials increase. That means it becomes especially more expensive for construction teams to build new homes or renovate existing homes. Ultimately, these high costs spill into the housing market and lift home prices for new builds and existing housing.

As property management professional and member of IREM, I am committed to upholding the very specific provisions of our contracts with residents, and often go above and beyond what is required to ensure residents have safe, decent, and affordable places to live. Rental housing is a deeply complex issue that is unique to every community. Creating additional layers of policies to a space that is already heavily regulated by state and local governments will have severe unintended consequences and will result in housing providers leaving the market, in communities where affordable housing is sorely needed.

Affordable housing is pivotal to creating paths to upward mobility for people across the country. Thank you for your commitment to ensuring we achieve this goal without impeding the supply of much-needed housing.

Sincerely,

Greg Smart, CPM®  
Chief Operating Officer