



NATIONAL LOW INCOME HOUSING COALITION

July 31, 2023

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

To Director Thompson:

We, the undersigned 352 organizations, call on the Federal Housing Finance Agency (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.

More than ever, bold policies are needed to ensure that people with the lowest incomes and the most marginalized people have stable, accessible, affordable homes. Renters across the nation are in crisis: high rents are putting more of America's lowest-income and most marginalized renters at risk of losing their homes and, in the worst cases, becoming homeless. Eviction filing rates are surpassing pre-pandemic averages, and in many communities, homelessness is increasing, with more people living in tents, cars, or shelters. America's housing crisis demands urgent action, and federal policymakers, including FHFA, must use every tool available to provide housing stability.

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. Broad and robust tenant protections are needed to rebalance the power that currently tilts heavily in favor of landlords at the expense of low-income and marginalized tenants.

At a minimum, FHFA should center its effort to create renter protections on the need for racial and social equity as an explicit goal, set mandatory requirements for all landlords and all rental properties with federally backed mortgages, and pair protections with strong enforcement. All actions by FHFA should be informed by continued engagement with renters and directly impacted people.

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 housing assistance, and to give families greater choice about where to live; (2) "just cause" eviction

The National Low Income Housing Coalition is dedicated to achieving racially and socially equitable public policy that ensures people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice.

standards and the right to renew leases to help protect renters from housing instability; (3) anti-rent gouging protections to stop landlords from dramatically raising rents; and (4) requirements to ensure housing is safe, decent, and healthy for renters and their families.

Source-of-Income Protections

In many states, there are no federal protections against arbitrary, retaliatory, or discriminatory evictions, or other abusive practices by landlords. Many low-income tenants who use housing subsidies like housing vouchers, emergency rental assistance, and other forms of public assistance struggle to find or maintain safe, quality, affordable housing due to source-of-income discrimination – the practice of denying an individual the full and equal access to housing based on their lawful source of income. Discrimination by landlords against renters can prevent households from effectively using federal, state, or local rental assistance and is often a pretext for illegal discrimination against renters of color, women, and people with disabilities.

“Just Cause” Eviction Standards

In most states and localities across the country, landlords are not required to provide a reason for evicting a tenant at the end of the lease term or for evicting a tenant without a lease. Landlords who are unable to evict a tenant during their lease term may choose not to renew the tenant’s lease and use the lease holdover as grounds for eviction. A tenant at the end of their lease is also at risk of unreasonable rental increases. When a tenant receives an eviction notice, faces rent hikes, or fears displacement, they may choose to leave their unit – or “self-evict” – rather than go to court. Those who pursue legal action often find that no laws exist to protect them from eviction at the end of a lease term and that having an eviction judgment on their record creates further barriers to obtaining and maintaining future housing.

Anti-Rent Gouging Protections

While several states have in place laws to prevent price or rent gouging after natural disasters, many renters have few protections against exorbitant rent increases. Recent rent increases are driven by several factors, including a growing demand for rental housing, limited supply, and high inflation. Rent increases can also be attributed to a mostly unregulated rental market that permits landlords to raise rents as high as the market will allow, without regard to the impact on tenants with low incomes. Further, real estate investors have been purchasing low-cost homes at an increasing rate, leading to further increases in rental prices and putting low-income renters at greater risk of eviction. The lack of anti-rent gouging measures places tenants at risk of unjust treatment, housing instability, and evictions.

Safe, Decent, Accessible and Healthy Housing

Housing is a social determinant of health, and as such, has an enormous impact on health and well-being, particularly for young children. Too often, however, low-income housing is plagued with issues related to air quality, pests, flooding, mold, lead, and water quality, leaving families

with low incomes few options for housing that is both affordable and safe. In the absence of safe, decent, healthy housing, children from low-income families who live in substandard housing are more likely to develop asthma and experience hospitalization, and adults are more likely to report poor mental health, including depression and anxiety.

People with disabilities struggle to find homes that are both affordable and accessible. Despite the tremendous need, less than five percent of housing nationwide is accessible for people with moderate mobility difficulties, and less than one percent is accessible for wheelchair users. The lack of accessible homes harms millions of renters and their families.

We urge FHFA to take bold action to implement these protections for all households living in properties with federally backed mortgages. These protections are necessary – along with to large-scale, sustained investments and anti-racist reforms – to ensure that the lowest-income and most marginalized renters have an affordable place to call home.

Sincerely,

National and Multistate Organizations

Affordable Homeownership Foundation, Inc.
African Communities Together
Barbara Poppe & Associates
Campion Advocacy Fund
Center for Law and Social Policy
Center for LGBTQ Economics Advancement & Research
Childrens Defense Fund
Community Change Action
Community Life Resources
Community Solutions
Congregation of Our Lady of the Good Shepherd, U.S. Provinces
Consumer Action
Consumer Credit and Budget Counseling, Inc. dba National Foundation for Debt Management
Educare Learning Network
Equal Rights Center
Housing Options & Planning Enterprises, Inc.

Justice in Aging
Liberation in a Generation
National Advocacy Center of the Sisters of the Good Shepherd
National Alliance of HUD Tenants
National Association for Latino Community Asset Builders
National Coalition for a Civil Right to Counsel
National Coalition for Asian Pacific American Community Development
National Council of Jewish Women
National Disability Rights Network
National Housing Resource Center
National Low Income Housing Coalition
National Manufactured Home Owners Association
National NeighborWorks Association
National Network to End Domestic Violence
National Office for Social Responsibilities
National Resource Center on Domestic Violence
National Women's Law Center
NETWORK Lobby for Catholic Social Justice

NewWest Community Capital
OUT for Sustainability
PolicyLink
Prosperity Now
Ready To Rent LLC
Revolving Door Project
Shriver Center on Poverty Law
Spirit for Change Consulting
The Kelsey
UnidosUS

State and Local Organizations or Governments

Alabama

Alabama Rural Coalition for the Homeless
Alabama Balance of State Continuum of Care

Alaska

Alaska Coalition on Housing and Homelessness
Family Promise Mat-Su
Nome Community Center

Arizona

Ability360
Arizona Housing Coalition
City of Sedona
City of Tucson
Fund for Empowerment
Human Services Campus, Inc.
Primavera Foundation: Project Action for Veterans
Take Charge America, Inc.
The Homing Project
William E. Morris Institute for Justice

Arkansas

Stoneworks Agency

California

Abrazar, Inc.
Affordable Housing Advocates
All Home
Alliance of Californians for Community Empowerment Action
California Coalition for Rural Housing
California Housing Partnership
Centro Legal de la Raza
Coalition for Economic Survival
Community Housing Development Corporation
Congregations Organized for Prophetic Engagement
East Bay Housing Organizations
Fair Housing Advocates of Northern California
Housing Equity & Advocacy Resource Team
Housing is a Human Right Orange County
I Did Something Good Today Foundation
Legal Aid of Sonoma County
Linc Housing
Long Beach Gray Panthers
Project Inland Empire
Redwood Gardens Tenant Association
Residents United Network Los Angeles
Rise Economy (formerly California Reinvestment Coalition)
San Diego Tenants United
Stanislaus County Office of Education
Stories From The Frontline
Ventura Homeless Prevention
Youth United for Community Action

Colorado

City of Colorado Springs
Colorado Coalition for the Homeless
Colorado Cross Disability Coalition
Manna

Connecticut

Community Commission on Housing and Homelessness – Pueblo
Covenant Shelter of New London, Inc.
Hartford Foundation for Public Giving
NHS of Waterbury
Partnership for Strong Communities
Plymouth Public Health Nursing Department

Delaware

Housing Alliance Delaware

District of Columbia

Eisen and Rome, P.C.
Greater Greater Washington

Florida

Helping Others Make Everything Right
Holy Ground Shelter for Homeless, Inc.
Homeless Coalition of Polk County
Miami Homes For All
The Cypress Cathedral Apartments Tenants Association, Inc.

Georgia

Georgia Advancing Communities Together, Inc.
Georgia Supportive Housing Association, Inc.
Project Infinity, Inc.
Rainey Day Fund

Hawaii

Hawaii Appleseed Center for Law & Economic Justice
Hawaii Health & Harm Reduction Center

Idaho

Boise/Ada County Homeless Coalition
Intermountain Fair Housing Council, Inc.

Illinois

Agape Missions, NFP
BEDS, Inc.
Brightpoint
Chicago Anti Eviction Campaign
Chicago Rehab Network
Christ the Servant: Peace & Social Justice Committee
Home of the Sparrow
Housing Action Illinois
Housing Opportunities and Maintenance for the Elderly
Law Center for Better Housing
LBBA
The Statewide Independent Living Council of Illinois
Will County Health Department

Indiana

Fair Housing Center of Central Indiana
Haven House Services, Inc.
HomesteadCS
Hoosier Action
Prosperity Indiana
The El Roi Restoration & Recovery Ranch

Iowa

Humility Homes & Services, Inc.
Sisters of St. Francis - Clinton

Kansas

Kansas Coalition Against Sexual and Domestic Violence

Kentucky

Coalition for the Homeless
Cuttin-Up Lawn Care and Grounds Maintenance LLC
Homeless and Housing Coalition of Kentucky

Kentucky Habitat for Humanity
Louisville Metro Affordable Housing Trust
Fund
Northkey Community Care of Northern
Kentucky
St. John Center
Supportive Network of Lake Cumberland
Welcome House, Inc.

Louisiana

Focus Clubhouse
Louisiana Fair Housing Action Center
Operation Restoration

Maine

Congolese Community of Maine
Maine Affordable Housing Coalition
Raise-Op Housing Cooperative

Maryland

Baltimore County Continuum of Care
Community Development Network of
Maryland
Consumer Credit Counseling Service of
Maryland
Maryland Center on Economic Policy
Public Justice Center
The Empowerment Team

Massachusetts

Castle Square Tenants Organization
Community Action Agency of Somerville,
Inc.
Immigrant Service Providers Group/Health
Massachusetts Coalition Against Sexual
Assault and Domestic Violence (JDI)
Northeast Independent Living Program
Our Ancestors Church & Coven

Michigan

Community Economic Development
Association of Michigan
Detroit Affordable Housing and
Homelessness Task Force
Family Youth Interventions
Great Lakes ADA of Michigan
Homeless Action Network of Detroit
Housing Resources, Inc.
Housing Services Mid Michigan
Lighthouse
Michigan Coalition Against Homelessness
Ozone House
Shelter Association of Washtenaw County
Washington Boulevard Block Club
Washtenaw Housing Alliance

Minnesota

HOME Line
Iska, Inc.
Minnesota Housing Partnership
Our Spring Lake Store LLC
Park Plaza Cooperative
Housing Justice Center
Violence Free Minnesota

Mississippi

Fannie Lou Hamer Center For Change
Mercy Housing and Human Development

Missouri

Build Missouri Health
Empower Missouri
Greater Kansas City Housing Information
Center
Holmes Garden Neighborhood Association
Paraquad, Inc.
Society of St. Vincent de Paul St. David
Conference
Springfield Tenants Unite
St. Francois County Community Partnership

United Way of Greater Kansas City

Montana

North Central Independent Living Services, Inc.

Nebraska

Nebraska Appleseed
Together

Nevada

Nevada Housing Justice Alliance

New Hampshire

Home for All Coalition
Concerned Citizens for the Homeless of the Tri-City Area

New Jersey

Center for Independent Living of South Jersey
Clinton Hill Community Action
Collaborative Support Programs of New Jersey
CSPNJ
Elizabeth Coalition to House the Homeless
Family Promise of Essex County
Family Promise of Morris County
Homefront
Homefront, Inc.
Homes for All Newark
Housing and Community Development Network of New Jersey
Hudson County Housing Resource Center
Manufactured Home Owners Association of New Jersey
New Community Corporation
New Jersey Association of Mental Health and Addiction Agencies, Inc.
New Jersey Association on Correction

New Jersey Community Development Corporation
New Jersey Tenants Organization
Occupy Bergen County
PennReach
Princeton Community Housing
Region Nine Housing Corporation
St. Augustine Multi-Service Program
The Affordable Homes Group
The Supportive Housing Association of New Jersey
The Waterfront Project, Inc.
Union County Housing Advocacy Team
WomenRising, Inc.
York Street Project

New Mexico

New Mexico Center on Law and Poverty
St. Elizabeth Shelters & Supportive Housing

New York

2-4 Tenant Association
Belmont Housing Resources for WNY, Inc.
Brooklyn Neighborhood Improvement Association, Inc.
Coalition for the Homeless
For the Many
Greater Syracuse Tenants Network
Habitat for Humanity of Tompkins and Cortland Counties
Homeless Services United
King Towers Resident Council
Neighborhood Preservation Coalition of New York State
Open Hearts Initiative
Rochester Housing Authority
Rural Housing Coalition of New York
Rural Housing Opportunities Corporation
West Bronx Housing & Neighborhood Resource Center

North Carolina

Cape Fear Housing Coalition
Children First/Communities in Schools
Buncombe County
Compañeros Inmigrantes de las Montañas en Acción (CIMA)
Good Shepherd Center
Little Listeners of the Carolinas
North Carolina Housing Coalition
North Carolina Justice Center
OnTrack WNC

North Dakota

Minot Area Homeless Coalition, Inc.

Ohio

Akron Leadership Foundation
Coalition on Homelessness and Housing in Ohio
Community Shelter Board
Fair Housing Resource Center, Inc.
Hope Whispers Community Organization
Northeast Ohio Black Health Coalition
Northeast Ohio Coalition for the Homeless
Ohio Animal Advocates
RESULTS - Central Ohio
United Way of Greater Toledo

Oklahoma

Mental Health Association Oklahoma
Oklahoma Policy Institute

Oregon

Housing Oregon
Our Just Future
Residents Organizing for Change
ROSE Community Development

Pennsylvania

ACHIEVEability
Affordable Housing Advocates

Community Action Partnership of Mercer County
DuBois Lakeside Church
Hill District Consensus Group
HOPE at the Foundation for Delaware County
Housing Alliance of Pennsylvania
Pennsylvania Association of Housing & Redevelopment Agencies
Pennsylvania Human Relations Commission
Philadelphia Housing Authority
Pittsburgh Black Worker Center
Self Determination Housing of Pennsylvania
The Homeless Advocacy Project

Puerto Rico

Coalicion de Coaliciones Pro Personas sin Hogar de Puerto Rico, Inc.

Rhode Island

Gather Together United as 1
Housing Network of Rhode Island
HousingWorks RI
RI Coalition to End Homelessness

South Carolina

South Carolina Appleseed Legal Justice Center

South Dakota

Pathways Shelter for the Homeless

Tennessee

African American Clergy Collective of Tennessee
Black Clergy Collaborative of Memphis
Clarksville Crisis 211 Center
Community Alliance for the Homeless
Community Bridges, Inc.
Foothills Community Development Corporation

Good Neighbor Foundation
Memphis Public Interest Law Center
NOAH

Texas

Center for Civic and Public Policy
Improvement
come dream. come build.
Disability Rights Texas
Ending Community Homelessness Coalition
Goodwill West Texas
Hidalgo County Urban County Program
Housing Opportunities of Fort Worth, Inc.
Houston Food Bank
RESULTS - Dallas Global
Texas Homeless Network
Texas Housers
Texas Tenants Union
United Way of Metropolitan Dallas

Utah

Community Action Services & Food Bank
Crossroads Urban Center
Journey of Hope, Inc.
Powerful Moms Who Care
Renters Justice Coalition
Southeastern Utah Association of Local
Governments
Utah Housing Coalition
Volunteers of America – Utah

Vermont

Vermont Coalition to End Homelessness

Virginia

Access Independence, Inc.
Blue Ridge Independent Living Center
Coalition Against Poverty in Suffolk
Northern Virginia Affordable Housing
Alliance
Piedmont Housing Alliance

Virginia Housing Alliance
Virginia Interfaith Center for Public Policy

Washington

Association of Manufactured Home Owners
Be:Seattle
Catholic Charities Eastern Washington
City of Olympia
Homes First
Housing Authority of Snohomish County
LASA
OPAL Community Land Trust
Resident Action Project
United Way of King County

West Virginia

Consumer Credit Counseling Service of the
Mid-Ohio Valley
West Virginia Coalition to End
Homelessness

Wisconsin

Affordable Housing Action Alliance
Habitat for Humanity of the Greater La
Crosse Region
JONAH Affordable Housing Task Force
Madison Tenant Power
Movin Out, Inc.
Pathfinders Milwaukee, Inc.
Shalom Center
Sheboygan County Warming Center
The BRICK Ministries, Inc.
Wausau Community & Economic
Development
Wisconsin Faith Voices for Justice

Wyoming

Habitat for Humanity of Laramie County