



On behalf of the Alliance for Housing Justice, we are pleased to submit the following response to the Federal Housing Finance Agency (FHFA) Request for Information.

The [Alliance for Housing Justice](#) (AHJ) is a collaborative of grassroots organizing, legal, policy and research organizations dedicated to supporting a strong housing justice movement that will ensure housing for all people. AHJ and its members have a long history and expertise in working directly with and on behalf of low-income communities of color that have and continue to bear the brunt of the housing affordability and stability crisis.

We are gratified that FHFA and the Biden Administration have listened to tenants across the country who have been demanding action. And we thank FHFA for beginning to address the critical need for rent stabilization and other renter protections. Instituting rent stabilization and renter protections will fulfill several provisions of FHFA's mission and the mission of the GSE's which it regulates. Specifically, requiring a basic level of stability and tenant protections in all Enterprise-backed transactions helps fulfill safety and soundness requirements, FHFA and the Enterprises' mission to serve low-income tenants and, by ensuring a more stable housing system, contributes to systemic liquidity. Beyond the specific statutory requirements found in the Safety and Soundness Act and in the Enterprises' Duty to Serve, FHFA and the Enterprises have a requirement to ensure the Fair Housing Act is enforced and to Affirmatively Further Fair Housing. Current data on renters of protected classes makes it abundantly clear that, to truly affirmatively further fair housing, FHFA and the Enterprises must require tenant protections that reduce disparities in evictions, displacement, and access to affordable rental housing.

FHFA and the GSE's have, through their history, provided tremendous benefit to the housing market generally and to private, for-profit lenders, developers and property owners in particular. However, the 44 million U.S. households who rent their homes are due our benefit from this public subsidy as well.

More detailed information, history, legal precedent, and justification for the following policy provisions is available in individual and joint AHJ member responses to the RFI, but as a coalition, we want to echo and reinforce the need for these modest and necessary provisions.

The most critical protection that renters need, and have needed, is a robust and enforced rent stabilization policy that limits annual rent hikes to 1.5 times the Consumer Price Index or 3%, whichever is lower, in Enterprise-backed properties. These rent increase limits should be applied universally and across tenancies, and as a requirement of accessing the benefit of Enterprise backed financing.

Imposing limits on rent increases is a proven policy that can immediately stabilize prices, halt rent gouging, and reduce the risk of displacement and homelessness, while increasing

housing security and affordability over the long term. Limits on rent increases will protect tenants from eviction and/or homelessness by creating a schedule for reasonable and gradual rent increases.

In addition to rent stabilization, FHFA should condition all Enterprise-backed mortgages with adherence to the following policies:

1. Good cause eviction protections
2. The right to organize
3. A ban on source of income discrimination
4. Enforcement and expansion of protections against discrimination
5. Requirements for safe, quality housing standards
6. Inclusion of fair lease provisions
7. Mandatory participation in a rental registry
8. Tenant or community opportunity to purchase

Finally, we support the creation of an Office of Tenant Protections that is empowered to enforce all the provisions implemented and give tenants and tenant organizations a way to directly raise issues and additional needs.

We welcome the opportunity to discuss this further with FHFA staff and leadership as the process continues. Please contact Liz Ryan Murray (lryanmurray@publicadvocates.org) with any questions.

Alliance for Housing Justice