

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,

Jamila Michener
*Department of Government and School of
Public Policy, Cornell University*

Ananya Roy
*Professor of Urban Planning, Social
Welfare, and Geography, University of
California, Los Angeles*

Keeanga-Yamahtta Taylor
Princeton University

Desiree Fields
UC Berkeley

Edward Goetz
University of Minnesota

Kathryn Howell
Virginia Commonwealth University

Dan Immergluck
Georgia State University

Akira Drake Rodriguez
University of Pennsylvania

Benjamin F. Teresa
Virginia Commonwealth University

Daniel Aldana Cohen
University of California, Berkeley

Shamus Khan
Princeton University

Brandon Weiss
American University

Laura Tach
Cornell University

Jacob Faber
New York University

Michael Storper
University of California, Los Angeles

Justin Steil
Massachusetts Institute of Technology

Chloe Thurston
Northwestern University

Marques A. Vestal
University of California, Los Angeles

Noah Zatz
*University of California, Los Angeles,
School of Law*

Rohan Grey
Willamette University College of Law

Paul Ong
University of California, Los Angeles

Vinit Mukhija
University of California, Los Angeles

Philip Ashton
University of Illinois Chicago

Megan E. Hatch
Cleveland State University

Elizabeth J. Mueller
University of Texas at Austin

Mark Kear
University of Arizona

Gary Blasi
University of California, Los Angeles

Elora Lee Raymond
Georgia Institute of Technology

Chris Tilly
University of California, Los Angeles

Erin McElroy
University of Washington

Hannah Appel
University of California, Los Angeles

Eric Seymour
Rutgers University

James DeFilippis
Rutgers University

Meghan Cope
University of Vermont

Rachel Brahinsky
University of San Francisco

H. Jacob Carlson
Kean University

Lawrence Vale
Massachusetts Institute of Technology

Gianpaolo Baiocchi
New York University, Urban Democracy Lab

Eric Robsky Huntley
Massachusetts Institute of Technology

Rahim Kurwa
University of Illinois Chicago

devin michelle buntun
Massachusetts Institute of Technology

Anthony Damiano
University of Minnesota

Aziz Rana
Boston College

Karl Klare
Northeastern University

Lua Kamal Yuille
Northeastern University

Ashraf Ahmed
Columbia Law School

John Whitlow
CUNY School of Law

Salome Viljoen
University of Michigan

Brian Highsmith
Harvard Law School

Raúl Carrillo
Columbia Law School

Monica C. Bell
Yale University

Nicole Santamaria
El/La Para TransLatinas

Lenore Palladino
University of Massachusetts Amherst

Heather K. Way
The University of Texas at Austin

Asli Bali
Yale University

Andrew H. Foster
Duke University Law School

Amna A. Akbar
Ohio State University, Moritz College of Law

Gregory D. Squires
George Washington University

Sally J. Scott
University of Maryland Baltimore County

Christoph Hanssmann
UC Davis

Robin Bartram
University of Chicago

Hilary Botein
Baruch College, CUNY

Sarah Schindler
University of Denver, Sturm College

Kellen Zale
University of Houston Law Center

Prentiss Dantzler
University of Toronto

Raj Patel
University of Texas at Austin

Corinne Blalock
Yale Law School

Alyssa Battistoni
Barnard College

Malini Ranganathan
American University

Nate Millington
University of Manchester

Richard Nisa
Carnegie Mellon University

John Stehlin
University of North Carolina at Greensboro

Alexa Eisenberg
University of Michigan

Beki McElvain
University of California, Berkeley

William D. Lopez
University of Michigan

Mijin Cha
University of California, Santa Cruz

Brian Glick
Fordham Law School

Dillon Mahmoudi
University of Maryland Baltimore County

Melissa Fernandez Arrigoitia
Bristol University

Nick Graetz
Princeton University

Jennifer Erb-Downward
University of Michigan

Fayola Jacobs
University of Minnesota

Margaret Dewar
University of Michigan

Mark Paul
Rutgers University

Lauren Williams
University of Michigan

Olúfẹ̀mi O. Táíwò
Georgetown University

Lenna Nepomnyaschy
Rutgers University

Nikki Luke
University of Tennessee, Knoxville

Miriam Greenberg
University of California, Santa Cruz

Rebecca Gourevitch
University of Maryland, College Park

David Wachsmuth
McGill University

Carl Gershenson
Princeton University

Liz Koslov
University of California, Los Angeles

Peter Hepburn
Rutgers University - Newark

Karen Chapple
University of California, Berkeley

Catherine D'Ignazio
Massachusetts Institute of Technology

Vincent Fusaro
Boston College

Amy Glasmeier
Massachusetts Institute of Technology

Melissa Creary
University of Michigan

Ceasar McDowell
Massachusetts Institute of Technology

Eva Rosen
Georgetown University

Peter Rich
Cornell University

Stefan Bouzarovski
University of Manchester

Philip Ashton
University of Illinois Chicago

Zac Taylor
Delft University of Technology

Savannah Cox
University of Sheffield

Fritz-Julius Grafe
University of Zurich

Annie Harper
Yale University

Sage Ponder
Florida State University

Talia Gordon
University of Chicago

Kristefer Stojanovski
Tulane University

Caitlin McMurtry
Washington University in St. Louis

Joshua Long
Southwestern University

Kate Brantley
University of Michigan

John Seungmin Kuk
Michigan State University

Emma Colven
University of Oklahoma

Jared Margulies
University of Alabama

Elizabeth Wrigley-Field
University of Minnesota, Twin Cities

Eric Nost
University of Guelph

Charles Fogelman
University of Illinois Urbana-Champaign

Guy Crawford
Bader College, Queen's University

Manuel B. Aalbers
KU Leuven, Belgium

Keith Woodward
University of Wisconsin-Madison

Melissa Garcia-Lamarca
Polytechnic of Turin

Dawn Biehler
University of Maryland, Baltimore County

Lauren Gifford
Colorado State University

Michael Goldman
University of Minnesota-Twin Cities

Eric Seymour
Rutgers

Mohammed Rafi Arefin
University of British Columbia

Jerome Whittington
New York University

Hillary Angelo
University of California Santa Cruz

Joseph Nevins
Vassar College

Tammy Lewis
City University of New York

Hugh Deaner
Adjunct Professor

Kathleen McAfee
San Francisco State University

Ken Gould
City University of New York

JP Sapinski
Université de Moncton

Julia Wagner
Clark University

Melissa Checker
City University of New York

Ruqaiijah Yearby
The Ohio State University

David Madden
London School of Economics

Margaret Wilder
University of Arizona

Antonella Pietta
University of Brescia

Rachel Weber
University of Illinois at Chicago

Kian Goh
University of California, Los Angeles

Carrie Mott
University of Louisville

Juanita Darling
San Francisco State University

Lily House-Peters
California State University, Long Beach