

July 31, 2023

Federal Housing Finance Agency  
Office of the Secretary  
Constitution Center  
400 7th Street, SW  
Washington, D.C. 20219

## **Re: Request for Input on Multifamily Tenant Protections**

The Homes Guarantee Campaign, along with 317 local, state, and national organizations, is pleased to submit this comment on tenant protections in multifamily homes with financing backed by Fannie Mae and Freddie Mac. On behalf of the tenants, tenant unions, grassroots organizations, academic, policy, legal, and research allies that make up the Homes Guarantee campaign, we thank Federal Housing Finance Agency (FHFA) Director Thompson and FHFA staff for conducting this request for input.

Fannie Mae and Freddie Mac (hereafter referred to as the GSEs) work with banks to make \$150 billion in financing available to landlords every year. The GSEs do not make loans directly to multifamily landlords but rather purchase multifamily loans from lenders. This promotes liquidity in the multifamily lending market while relieving lenders of default risk. Even though the GSEs do not directly lend to landlords, they guarantee the loans that landlords take out, allowing lenders to continue making loans to other landlords. The GSEs provide a major financial benefit to lenders and the multifamily housing finance system as a whole.

In today's market, Enterprise-backed financing has become a tool that enriches real estate investors, often at the expense of tenants. Favorable loan terms benefit the landlords and their investors; tenants are an afterthought, mostly unprotected by any rights or regulations. The GSEs have a track record of buying and providing guarantees to overvalued loans. Many of these loans can only be paid down if the borrower plans to hike rents and fees, neglect building maintenance, and evict tenants. The GSEs have enabled a market that, in some ways, incentivizes predatory behaviors by landlords.

FHFA serves as the regulator and conservator of the GSEs. In these capacities, FHFA has the potential to implement tenant protections in an estimated 8 million rental units with Enterprise-backed mortgages.<sup>1</sup> These protections are critical to protecting the safety and soundness of the secondary mortgage market and preserving the existing supply of affordable rental housing. By incorporating the tenant protections recommended here, the FHFA can move us toward a housing system that truly promotes affordability and racial justice.

### **An Unprecedented Housing Crisis Requires Bold Action from the FHFA**

FHFA's request for input (RFI) on tenant protections comes at a time of unprecedented housing unaffordability, evictions, and homelessness. In 2021, the number of tenants with unaffordable rents reached an all-time high, with 49% of US renters paying more than a third of their income to rent.<sup>2</sup> In February 2022, year-over-year growth in rental prices reached a record peak of 17.2% across the U.S.<sup>3</sup> During the pandemic, corporate landlords seized the opportunity to consolidate

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<sup>1</sup> Goodman, L., Kaul, K., Neal, M. *The CARES Act Eviction Moratorium Covers All Federally Financed Rentals- That's One in Four US Rental Units*, Urban Institute. Accessed Jul 19, 2023 .  
<https://www.urban.org/urban-wire/cares-act-eviction-moratorium-covers-all-federally-financed-rentals-thats-one-four-us-rental-units>

<sup>2</sup> Joint Center for Housing Studies of Harvard University, *The State of the Nation's Housing 2023*, Harvard University, accessed June 13, 2023,  
[https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard\\_JCHS\\_The\\_State\\_of\\_the\\_Nations\\_Housing\\_2023.pdf](https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_The_State_of_the_Nations_Housing_2023.pdf)

<sup>3</sup> Zillow, *Two-year Rent Growth Streak Ends in Small Step Toward Normalcy*, (Nov. 15, 2022)  
(<https://www.zillow.com/research/zillow-rent-report-october-2022-31676/>)

their market share and used inflation to hike rents and accumulate excessive profits.<sup>4</sup> In many cases, landlords are using algorithms to set high rents and evict tenants.<sup>5</sup> This has led median rents across the U.S. to surpass \$2,000 for the first time, and there is no longer a single state or county where a worker earning a full-time minimum wage salary can afford a modest two-bedroom apartment. In fact, to afford a two-bedroom apartment, a minimum wage worker would need to work four jobs or have three roommates.<sup>6</sup>

The rental affordability crisis displaces tenants with lower-paying jobs, thus exacerbating labor shortages and threatening economic growth and stability. For low to medium income households, rapidly rising rents exacerbate the risks of housing insecurity, homelessness, physical and mental health challenges, child educational disruptions, and economic precarity.<sup>7</sup> Racialized housing segregation is reinforced and reproduced by the especially devastating impacts of the rental affordability crisis on tenants of color who are disproportionately more likely to face eviction, experience homelessness, and be displaced from their neighborhoods.<sup>8</sup>

In the absence of universal tenant protections for the third of US households currently living in rental housing, tenants are inconsistently protected depending on where they live.<sup>9</sup> The effects in areas with minimal protections are profound and most directly impact tenants of color, especially Black women, low-income populations, individuals with disabilities, and victims of domestic violence, who are displaced from their homes at alarming rates and often find it impossible to regain access to safe, affordable, and stable housing.

Evictions and rapidly rising rents are experienced in greater magnitudes by communities of color. Matthew Desmond's 2020 research shows that Black and Latino renters are disproportionately threatened with eviction and disproportionately evicted from their homes.<sup>10</sup> For centuries, but especially in the last 100 years, federal policies and private practices have led to the theft of land and housing opportunities for millions of Black and brown households in the United States, resulting in the deep racial disparities in housing access and ownership that exist today. In 2020, 72% of White households owned their homes, compared to 42% of Black households, 48% of Latino households, 42% of Pacific Islander households and 58% of Native American households.<sup>11</sup> Accordingly, the lack of tenant protections in the rental market disproportionately impacts renters of color.

Furthermore, federal policies and private practices to disinvest in communities of color and exclude them from various wealth-building initiatives and opportunities have contributed to a larger racial wealth gap, meaning households of color have less money to spend on housing. As a result, renter households of color are disproportionately housing cost-burdened – and are hit harder by rising rents. In 2020, 45% of White renters were cost-burdened, compared to 56% of Black renters

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<sup>4</sup> Accountable.US, America's Biggest Multifamily and Single-Family Landlords Continue to Reap Huge Profits and Take Advantage of Tenants, (April 10 2023) (<https://accountable.us/wp-content/uploads/2023/04/2023-04-10-Updated-Research-On-Housing-Profiteering-FINAL.docx-1.pdf>)

<sup>5</sup> Heather Vogell, Rent Going Up? One Company's Algorithm Could be Why, ProPublica, (Oct. 15, 2022) (<https://www.propublica.org/article/yieldstar-rent-increase-realpage-rent>)

<sup>6</sup> National Low Income Housing Coalition, *The Gap: A Shortage of Affordable Rental Homes*, (March 2023) (<https://nlihc.org/gap>)

<sup>7</sup> U.S. Government Accountability Office, Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population, (July 2020) (<https://www.gao.gov/assets/gao-20-433.pdf>); Abha Bhattarai & R. Siegel, Inflation is Making Homelessness Worse, Washington Post, (July 2022) (<https://www.washingtonpost.com/business/2022/07/03/inflation-homeless-rent-housing/>).

<https://www.opportunityhome.org/resources/stable-affordable-housing-drives-stronger-student-outcomes/>

<sup>8</sup> Timothy A. Thomas, Ott Toomet, Ian Kennedy, & Alex Ramiller, *The State of Evictions: Results from the University of Washington Evictions Project*, University of Washington (Jan. 6, 2020) (<https://evictionresearch.net/washington/>)

<sup>9</sup> A National Survey of Tenant Protections Under State Landlord Tenant Acts, Freddie Mac Multifamily, (Feb. 2023) (<https://mf.freddiemac.com/docs/tenant-protections-white-paper.pdf>)

<sup>10</sup> Hepburn, Peter, Renee Louis, and Matthew Desmond. 2020. "Racial and Gender Disparities among Evicted Americans." *Sociological Science* 7: 649-662.

<sup>11</sup> National Equity Atlas, "Homeownership: United States, 2020," PolicyLink and the USC Equity Research Institute, accessed June 13, 2023, <https://nationalequityatlas.org/indicators/Homeownership>.

and 54% of Latino renters.<sup>12</sup> This RFI represents a historic moment with potential for the FHFA to have a meaningful impact on closing racial disparities across the rental market, in which renters of color – who have been marginalized and extracted from by private actors via predatory exclusion and inclusion – are the most vulnerable, and the least protected.

### **The FHFA has the Legal Authority to Impose Tenant Protection Requirements on its Borrowers**

Through the GSEs, FHFA has regulatory authority over approximately one-quarter of U.S. multifamily assets<sup>13</sup> and has the ability to exert significant influence over a sizable portion of the multifamily rental market. Through FHFA’s statutory mission to finance affordable housing, ensure stability in the market, and obligation to Affirmatively Further Fair Housing by mitigating the displacement and segregation of communities of color,<sup>14</sup> it has the opportunity to exert its influence over a significant portion of the rental housing market with Enterprise-backed mortgages.

The FHFA has oversight over the GSEs as both a conservator and regulator and has the broad authority necessary to facilitate equitable and sustainable access to housing. The agency is also well equipped – as both a conservator and regulator – to ensure that Fannie Mae and Freddie Mac adhere to the affordable housing obligations required of them. Since tenant protections fall squarely within the agency’s commitment to equitable, sustainable, and affordable housing, FHFA must use its power to bolster and expand tenant protections in Enterprise-backed properties. As discussed in the Tenant Protection RFI, the FHFA has ample past precedent of requiring tenant protections for properties whose loans they will purchase, including pad lease protections for residents of manufactured home communities and additional eviction protections during the COVID-19 pandemic.<sup>15</sup>

### **Recommendations**

The FHFA must require the following tenant protections in all Enterprise-backed multifamily properties. These protections must be implemented together, as they are interdependent: for example, for a tenant’s right to organize to be effective, they also must be protected from a lease non-renewal without good cause. Similarly, good cause eviction protections are insufficient without limits on large, unreasonable rent increases, which can serve as *de facto* evictions.

#### **1. Limit Egregious Rent Hikes**

The FHFA should limit rent hikes at 3% annually in Enterprise-backed properties. This limit on rent hikes should be applied universally and as a requirement.

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.

Currently, landlords of Enterprise-backed properties face little to no federal restrictions regarding whether and how much they can increase their tenants’ rents. In fact, their business model and profitability often depend on raising rents significantly higher than what existing tenants can afford.

While a restriction on rent increases in FHFA-financed multifamily buildings will not have as large of a local impact as an entire state or municipality opting into a rent stabilization regime, research on the impact of rent regulations is useful in demonstrating their positive outcomes. A 2019 review of existing academic research on the economic and social impacts of rent regulations found that rent regulations improve affordability for tenants and that, on balance, rent regulations do not increase the cost of renting non-regulated units. In localities where they do, closing policy loopholes (such as condo

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<sup>12</sup> National Equity Atlas, “Housing burden: United States, 2020,” PolicyLink and the USC Equity Research Institute, accessed June 13, 2023, [https://nationalequityatlas.org/indicators/Housing\\_burden?breakdown=by-race-ethnicity](https://nationalequityatlas.org/indicators/Housing_burden?breakdown=by-race-ethnicity).

<sup>13</sup> Board of Governors of the Federal Reserve System (US), Government Sponsored Enterprises; Multifamily Residential Mortgages; Asset, Level, [BOGZ1FL403065405Q] retrieved from FRED, Federal Reserve Bank of St. Louis; (<https://fred.stlouisfed.org/graph/?g=16xbf>) (June 27, 2023).

<sup>14</sup> 42 USC 3608(d); 42 U.S.C. 3601 et seq. (imposing the duty to affirmatively further fair housing to all federal agencies with regulatory or supervisory authority over financial institutions).

<sup>15</sup> Federal Housing Finance Agency, *Tenant Protections for Enterprise-Backed Multifamily Properties: RFI*, accessed June 13, 2023, 3-6, <https://www.fhfa.gov/Media/PublicAffairs/PublicAffairsDocuments/Multifamily-Tenant-Protections-RFI.pdf>.

conversions) can help.<sup>16</sup> In fact, some research shows that rent regulations could help keep rent more affordable for all renters. For example, a 2007 study of rents in Boston, Cambridge, and Brookline, Massachusetts, distinguished between controlled and uncontrolled units, indicated that having 10 to 12 percent of rent-stabilized units in an area decreases the rents of non-controlled units by \$23 to \$28.<sup>17</sup> Finally, multiple studies have found that rent regulations have little impact on the construction of new housing.<sup>18</sup>

## **2. Institute Good Cause Eviction Protections**

The FHFA should institute good cause eviction protections in Enterprise-backed properties. Good cause (sometimes referred to as “just cause”) protections means that landlords can only evict tenants in the event of serious and repeated lease violations when the tenant has failed to cure their breach after being given notice. The purpose of good-cause evictions should be to protect the health and safety of residents and employees, to protect the premises from major damages, and to enforce the obligation to pay rent. For Enterprise-backed properties, the definition of good cause for eviction should be especially narrow. Common exceptions from other contexts – such as in the event that the landlord wishes to live in a unit as an owner-occupant – are unlikely to be relevant.

Good cause eviction policies protect the rights of tenants to seek repairs and to organize with other tenants. Lease non-renewals and evictions are often used by landlords in retaliation for maintenance requests or tenant organizing.

Good cause is a well-established protection in federally assisted housing programs such as the Low Income Housing Tax Credit (LIHTC) program and the HOME Investments Partnerships (HOME) program. Additionally, several states, including California, New Jersey, and others, have good cause protections. The FHFA itself is familiar with good cause protections, having imposed them on borrowers of Enterprise-backed mortgages for manufactured home communities through its Pad Lease protections.

## **3. Respect the Right to Organize**

The FHFA should require landlords with Enterprise-backed mortgages respect tenants’ rights to organize, form tenant unions, and elect tenant union leadership, free from retaliation. The right to organize is required in several federal housing programs, including public housing and HUD-supported multifamily housing.<sup>19</sup>

## **4. Ban Source of Income Discrimination**

The FHFA should ban source of income discrimination in Enterprise-backed properties. Bans on source of income discrimination require landlords to accept all lawful forms of payment, including Section 8 Housing Choice Vouchers. Landlords with Enterprise-backed mortgages should not be allowed to refuse to rent to participants in federal housing programs. These protections are already required for recipients of HOME and LIHTC funding.<sup>20</sup>

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<sup>16</sup> Pastor, M., Carter, V., Abood, M. (2018). “Rent Matters: What Are the Impacts of Rent Stabilization Measures?” USC Dornsife Program for Environmental and Regional Equity.

[https://dornsife.usc.edu/assets/sites/242/docs/Rent\\_Matters\\_PERE\\_Report\\_Final\\_02.pdf](https://dornsife.usc.edu/assets/sites/242/docs/Rent_Matters_PERE_Report_Final_02.pdf).

<sup>17</sup> Sims, David P. 2007. “Out of Control: What Can We Learn from the End of Massachusetts Rent Control?” *Journal of Urban Economics* 61(1):129–51.

<sup>18</sup> See, e.g. John I. Gilderbloom and Ye Lin, “Thirty Years of Rent Control: A Survey of New Jersey Cities,” *Journal of Urban Affairs* 29, 2 (2007): 213–214; Joshua Ambrosius, John Gilderbloom, William Steele, Wesley Meares, and Dennis Keating, “Forty Years of Rent Control: Reexamining New Jersey’s Moderate Local Policies after the Great Recession,” *Cities* 49 (2015): 128. (finding no significant relationship between rent control and new housing development by comparing New Jersey municipalities with and without moderate rent control); and Miriam Zuk, “Rent Control: The Key to Neighborhood Stabilization?” Urban Displacement Project, September 9, 2015, <https://www.urbandisplacement.org/blog/rent-control-the-key-to-neighborhood-stabilization/> (finding that the six cities with rent control in the Bay Area produced more housing units per capita than cities without rent control between 2007 and 2013). For a more detailed examination of the literature regarding the effectiveness of rent control and its lack of impact on new construction, see the longer technical comment submitted by the Homes Guarantee Campaign.

<sup>19</sup> White House Domestic Policy Council and National Economic Council, *The White House Blueprint For a Renters Bill of Rights*, accessed June 13, 2023, 14, <https://www.whitehouse.gov/wp-content/uploads/2023/01/White-House-Blueprint-for-a-Renters-Bill-of-Rights.pdf>.

<sup>20</sup> Local Housing Solutions, “Source of Income Laws,” Housing Policy Library, accessed June 13, 2023, <https://localhousingsolutions.org/housing-policy-library/source-of-income-laws/>.

## **5. Enforce and Expand Protections Against Discrimination**

The FHFA should enforce existing laws that prohibit landlords from denying a tenant rental housing based on race, physical or mental ability, and family make-up, and expand protections to prohibit discrimination based on sexual orientation, gender expression or identity, immigration status, conviction and/or arrest history, bankruptcy history, eviction history, or credit score in Enterprise-backed properties.

## **6. Require Safe, Quality Housing Standards**

The FHFA should articulate a clear set of habitability standards for Enterprise-backed properties. The FHFA should model its standards on the U.S. Department of Housing and Urban Development's Housing Quality Standards for the Housing Choice Voucher program.

## **7. Include Fair Lease Provisions**

The FHFA should develop standard fair lease provisions for all states and territories and require landlords of properties with Enterprise-backed mortgages to use them. The FHFA and the GSEs should work to develop standard fair leases for all states and territories, as well as the District of Columbia, in recognition of the variation that exists in state landlord-tenant law and state civil procedure. In developing fair lease provisions, the FHFA should view existing state lease requirements as a floor rather than a ceiling and go further to protect tenants. In particular, fair leases should:

- Provide at least a ten-day grace period in which to pay rent before any late fee is assessed;
- Cap late fees at 5% of the amount of rent owed;
- Ban junk fees;
- Limit security deposits to one month's rent;
- Clarify the circumstances under which landlords can withhold security deposits and the procedural steps that they have to take to be authorized to do so.

## **8. Participate in a Rental Registry**

The FHFA should require all Enterprise-backed properties to participate in a rental registry that is publicly available and accessible to tenants. The registry should include information that is key to tenants making an informed decision about leasing an apartment such as the number of code violations, evictions, and average rent hikes in a property. Tenants should also have access to contact information of the real, beneficial owner(s) of the property.

## **9. Create an Office of Tenant Protections with Enforcement Power**

The protections outlined in this letter require diligent and proactive enforcement. Accordingly, the FHFA should create an Office of Tenant Protections that is responsible for ensuring that borrowers comply with required tenant protections. The Office of Tenant Protections would be responsible for identifying landlords (both corporate entities and the individuals behind them) who must be barred from future participation in Enterprise-backed mortgage programs in the event of serial and/or egregious violations of tenants' rights. Additionally, the Office of Tenant Protections should evaluate the effectiveness of existing tenant protections, conduct research on how market trends and emerging practices affect tenants' rights, and propose additional protections to ensure that the FHFA's tenant protections do not become outdated.

We appreciate the opportunity to comment on this urgent matter. We urge the FHFA to finalize multifamily tenant protection policies that include our recommendations. For more information, contact:

Grace White ([g.white@peoplesaction.org](mailto:g.white@peoplesaction.org)).

Sincerely,

The Homes Guarantee Campaign and undersigned organizations.

## **NATIONAL**

Accountable.US  
Action Center on Race and the Economy  
ADOS Advocacy Foundation  
African Communities Together  
Alliance for Housing Justice  
Americans for Financial Reform Education Fund  
Center for Economic and Policy Research  
Center for Law and Social Policy  
Center for Popular Democracy  
Coalition for the Homeless  
Consumer Action  
Church World Service  
Debt Collective  
Demos  
Housing Rights Initiative  
Human Impact Partners  
Institute for Local Self Reliance  
Jobs With Justice  
JustFix  
Liberation in a Generation  
Local Progress  
MLPB  
National Coalition for a Civil Right to Counsel  
National Coalition for the Homeless  
National Equality Action Team (NEAT)  
Organized Communities Against Deportations  
Parents Together Action  
Partners for Dignity & Rights  
People's Action Institute  
PolicyLink  
PowerSwitch Action  
Poverty & Race Research Action Council  
Private Equity Stakeholder Project  
Public Citizen  
Race Forward  
Revolving Door Project  
Service Employees International Union (SEIU)  
Showing Up For Racial Justice (SURJ)  
Social Security Works  
Sunrise Movement  
Unemployed Workers United  
United for Respect  
United for a Fair Economy  
Upturn  
Western Regional Advocacy Project  
Youth Alliance for Housing

## LOCAL

ACCE  
ACT UP Philadelphia (AIDS Coalition To Unleash Power)  
Action North Carolina  
Action St. Louis  
ACW  
Affordable Housing Network of Santa Clara County  
AFT CHICAGO Black Caucus  
Age-friendly Englewood Village  
Alliance for Community Transit - Los Angeles  
Appalachian GameChangers  
Arkansas Community Organizations  
Arkansas Renters United  
Art Against Displacement  
Asian Pacific Environmental Network  
Battle Born Progress  
Be:Seattle  
Bedford County Listening Project  
Berkeley Tenants Union  
Big Shoulder Church Chicago  
Binghampton Tenants Union  
Black Leadership Action Coalition of Kentucky  
Broken Hearted Homes Renter's Association  
Broadway UMC  
Bozeman Tenants United  
Buffalo Anti Racism Coalition  
CA Renters Caucus  
CAAAY: Organizing Asian Communities  
CADEM Renters Council  
California Calls  
California Foundation for Independent Living  
Cape Girardeau Tenants  
CASA (Community Action for Safe Apartments)  
Cathedral in the Night Ministry  
Center for Biological Diversity  
Center for Community Action and Environmental Justice  
Center for Healing Racial Trauma  
Chainbreaker Collective  
Change Today, Change Tomorrow  
Charles House  
Charleston DSA  
CHD/Family Outreach of Amherst  
Chicagoland Black Chamber of Commerce Inc  
Chiquita Jackson Enterprise  
Chispa  
Churches United For Fair Housing | CUFFH  
Citizen Action of New York  
City-Wide Tenant Union of Rochester  
Clergy & Laity United for Economic Justice  
Colorado People's Alliance  
Communities Resist  
Communities United For Action  
Community Action Agency of Somerville, Inc.  
Community Alliance of Tenants  
Community Control Now  
Community First Whatcom  
Community Justice Project  
Community Legal Services of Philadelphia  
Community Voices Heard  
Compost Cooperative, Inc.  
Congolese Integration Network  
Connecticut Citizen Action Group  
Cooper Square Committee  
Courage California  
Crenshaw Subway Coalition  
Crown Heights CARE Collective  
CUFFH Action  
Culinary Union  
DARE (Direct Action for Rights and Equality)  
Detroit Action  
DSA LA  
Domus Incorporated  
Down Home North Carolina  
East Village Mutual Aid  
Eden Community Land Trust  
El Shaddai Refuge Homes  
Ensuring Opportunity Campaign  
EKY Mutual Aid  
Faith in Action Nevada  
Faith in the Valley  
Firelands Workers Action  
First Wednesdays San Leandro  
Florida for All  
Florida Housing Justice Alliance  
Florida Rising  
Franklin County Continuing the Political Revolution  
Freedom BLOC  
Fund for Empowerment  
Fuerte Arts Movement  
Glad Tidings COGIC  
Granite State Interfaith Action Fund  
Granite State Organizing Project  
Granite State Tenants Union  
Greening Greenfield  
Ground Game LA  
Health Justice Alliance Law Clinic  
HerStory Ensemble LLC  
HOMES Campaign DE  
Hometown Action  
Homeless and Housing Coalition of Kentucky  
Hoosier Action  
Housing Conservation Coordinators  
Housing Equality & Advocacy Resource Team (HEART LA)  
Housing Greenfield

Housing Justice Center  
 Housing Justice for All-NY  
 Housing Rights Committee of San Francisco  
 HousingLOUISIANA  
 HousingNow!CA  
 Human Rights Protection & Global Peace  
 Illinois Coalition of African American Business  
 Organizations  
 Inland Equity Community Land Trust  
 InnerCity Struggle  
 Inquilinx Unidxs por Justicia  
 Iowa Citizens for Community Improvement  
 Ithaca DSA  
 Ithaca Tenants Union  
 Jane Addams Senior Caucus  
 JC Hodge Associates  
 KB Comms  
 KC Tenants  
 Kentuckians for the Commonwealth  
 Kentucky Anti-Eviction Network  
 Kentucky Equal Justice Center  
 Kentucky Student Environmental Coalition  
 Kentucky Tenants  
 KIWA  
 Latino Health Access  
 Legal Aid Justice Center  
 Legal Services Staff Association, NOLSW/UAW 2320  
 Lexington Tenants Union  
 Lift the Ban Coalition  
 Lift Up Contra Costa  
 Living United for Change in Arizona (LUCHA)  
 Local Clean Energy Alliance  
 Louisiana Fair Housing Action Center  
 Louisville Metro Council District 4  
 Louisville Recovery Community Connection, Inc.  
 Louisville Showing Up for Racial Justice  
 Louisville Tenants Union  
 LSSA 2320  
 Maine People's Alliance  
 Make It Work Nevada  
 Make the Road Nevada  
 Mar Vista Voice  
 Maryland Communities United  
 Masks for Victory S. Illinois  
 Mass Renews Alliance  
 Metropolitan Interfaith Council on Affordable Housing  
 Miami Homes for All  
 Miami Workers Center  
 Michigan United MinKwon Center for Community  
 Action  
 Monterey Bay Renters Coalition  
 Monterey County Renters United  
 Monument Impact  
 NAACP - Lexington-Fayette Branch  
 Neighbors Together  
 Neighbor to Neighbor  
 Nelsonville Voices  
 Network Delaware / H.O.M.E.S Campaign  
 New Jersey Citizen Action  
 New York Doctors Coalition  
 Nobody Leaves Mid-Hudson  
 Northtown Resident Council  
 Not Me We  
 NPEU (IFPTE Local 70)  
 OCCORD  
 OneAmerica  
 ONE Northside  
 One Redwood City  
 Parable of the Sower Intentional Community  
 Cooperative  
 Partnership for the Public Good  
 Party for Socialism and Liberation- Louisville  
 Pasadena Tenants Union  
 Pennsylvania Stands Up  
 PICO California  
 Pioneer Village Tenants Association (PVTa)  
 POWER  
 Progressive Asian Network for Action  
 Progressive Leadership Alliance of Nevada  
 Progressive Maryland Public Counsel  
 Public Advocates  
 Public Health Institute of Western Massachusetts  
 Puente Human Rights Movement  
 PUSH Buffalo  
 Raise-Op Housing Cooperative  
 Rebuild, Overcome, and Rise (ROAR) Center at UMB  
 Reclaim Philadelphia  
 Rent and Mortgage Relief SLO County  
 Rent Zero Kansas  
 Resident Action Project  
 Right to Counsel NYC Coalition  
 Rights & Democracy New Hampshire  
 Rights & Democracy Vermont  
 Rise Economy  
 Rise Up West Virginia  
 River Valley Organizing  
 Root Cause Research Center  
 S.T.R.O.N.G Youth, Inc.  
 San Francisco Anti-Displacement Coalition  
 San Gabriel Valley Tenants Alliance  
 Save Section 9  
 South Carolina Housing Justice Network  
 South Carolina Progressive Network  
 Siembra NC  
 Silicon Valley De-Bug  
 Silicon Valley DSA  
 Socio-Spatial Climate Collaborative (UPenn)  
 Sonoma County Tenants Union



Sonoma Valley Housing Group  
South Louisville Community Ministries  
South of Market Community Action Network  
(SOMCAN)  
South Shore Wealth Authority Giving Gratitude, LLC  
Springfield No One Leaves  
Stand Up Nashville  
Steering Committee of Las Vegas Democratic Socialists  
of America  
St. James AME Church  
Strategic Actions for a Just Economy (SAJE)  
Struggle for Miami's Affordable and Sustainable  
Housing  
Students Break the Silence NYC  
Students for Transit Justice  
Summers County Huddle  
The Neighborhood Resource Center  
Tenant Law Center  
Tenants Political Action Committee  
Tenants Rights for Durhamites  
Tenants Together  
Tenants Union of WA  
Territorial Empathy  
Texas Organizing Project  
Thai Community Development Center  
The Center for Independence of the Disabled, NY  
The Hope Buss, Inc  
The Justice League Inc  
The Kennedy Commission  
The Peer Defense Project  
The People's Lobby

The People's Resource Center  
The Women's Building  
TN4SafeHomes  
Transit Riders Union  
Tzedek DC  
Tyler For Knox  
Unified Citizens, Inc.  
United Church of Rogers Park  
United Council For Change  
United Vision for Idaho Unity Fellowship of Christ  
Church-NYC  
Universal Labor Foundation Ltd.  
University Neighborhood Housing Program  
Uptown People's Law Center  
Urban Justice Center Venice Community Housing  
Virginia Organizing  
VOCAL-KY  
VOCAL-NY  
Welcome Home Skagit  
West Louisville Women's Collaborative  
Western Massachusetts Network to End Homelessness  
Westside Health Authority  
Westside Community Organization  
Wethepeoplenyc  
Willow Permanent Real Estate Cooperative LLC  
Winners PLUS Inc  
Women with Broken Heals  
Youth Power Coalition