

May 1, 2020

Federal Housing Finance Agency
400 7th Street SW
Washington, DC 20024

U.S. Department of Veterans Affairs
810 Vermont Ave NW
Washington, DC 20571

U.S. Department of Housing and Urban
Development
451 7th Street SW
Washington, DC 20410

U.S. Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Re: Identification of Rental Properties Covered in CARES Act

Dear Director Calabria, Secretary Carson, Secretary Wilkie, and Secretary Perdue,

The **94** undersigned organizations write to urge the Federal Housing Finance Agency (FHFA), U.S. Department of Housing and Urban Development (HUD), U.S. Department of Veterans Affairs, and the U.S. Department of Agriculture to provide tenants with a mechanism to identify whether their apartment, home, or manufactured housing is covered by the tenant protections in section 4024 of the Coronavirus Aid, Relief, and Economic Security Act (CARES) Act.

The CARES Act places a temporary 120-day moratorium on eviction filings for tenants living in covered properties. It defines covered property as one that participates in certain housing programs or one that is secured by a federally backed (single-family) mortgage loan or a federally backed multifamily mortgage loan.

These are important protections for tenants and manufactured housing residents living in covered properties, but currently not all tenants and residents are able to determine if their property qualifies for such relief. Tenants and residents are generally not privy to the type of mortgage that their landlord has on a rental property. To help some renters learn whether they are protected, the National Low Income Housing Coalition released on April 17 a [searchable database and interactive map](#) of multifamily rental properties covered under the CARES Act. However, the database is incomplete. For example, it does not include mortgaged multifamily properties with non-securitized Fannie Mae and Freddie Mac mortgages.

For tenants and residents in single-family properties, there is no publicly available database or list of addresses of properties with federally backed single-family mortgages at all. Even though the CARES Act has made the basic question of whether a particular loan is federally backed a matter of urgent public concern, currently, only a property owner can look up whether their loan is secured by Fannie Mae or Freddie Mac or check their mortgage documents to determine if they have an FHA, VA or USDA loan. Tenants and residents should not have to conduct research in county land records (many of which are not even available online), and they should not have to rely on getting this critical information from their landlords since many owners may be unable or unwilling to respond to such requests.

Tenants and manufactured housing residents must be able to identify whether their homes qualify for this relief so that they can protect themselves and manage their expectations. We ask that you collaborate to provide accessible resources that will enable tenants in both multifamily and single-family properties to determine if they are covered by section 4024 of the CARES Act. These resources should include, at a minimum, a publicly available and searchable internet database where tenants and residents can look up their addresses and a toll-free telephone line they can call to obtain the same information.

Thank you for your consideration of this important issue. We look forward to working with you to make sure that all families remain safely in their homes so that they have a secure place to shelter through this pandemic.

Sincerely,

Americans for Financial Reform Education Fund
Advocates for Basic Legal Equality, Inc.
African American Health Alliance
Alliance for Housing Justice
American Civil Liberties Union
ArchCity Defenders, Inc.
Bread for the City
California Reinvestment Coalition
Center for Community Progress
Center for Disability Rights
Center for Responsible Lending
City Garden Montessori School
Coalition for Economic Survival (CES) - Los Angeles
Community Justice Project, Inc.
Community Legal Services, Inc. (Philadelphia)
Connecticut Fair Housing Center
Consortium for Citizens with Disabilities Housing Task Force
Consumer Action
Consumer Federation of America
DeSales Community Development
Diamond Diva Empowerment Foundation Initiative
Disability Rights Education & Defense Fund (DREDF)
Disability Rights Florida
Greater Boston Legal Services
Greater Napa Valley Fair Housing Center
Grounded Solutions Network
Habitat for Humanity of Lincoln
Heights Community Coalition - Jersey City, NJ
Homeless Persons Representation Project, Inc.
Housing and Economic Rights Advocates

Housing California
Housing Choice Partners
Housing Equality & Advocacy Resource Team
Housing Justice Center
Human Rights Campaign
Inner City Law Center
Invest DSM, Inc.
Lantern Community Services
Law Foundation of Silicon Valley
Lawyers' Committee for Civil Rights Under Law
Legal Aid of Nebraska
Legal Aid Society of the District of Columbia
Local Initiatives Support Corporation
Louisiana Fair Housing Action Center
Metropolitan St. Louis Equal Housing and Opportunity Council
MHAction
Mountain State Justice
NAACP
NACEDA
National Action Network
National Association for County Community and Economic Development
National Association for Latino Community Asset Builders
National Center for Transgender Equality
National Coalition for Asian Pacific American Community Development
National Coalition for Homeless Veterans
National Community Reinvestment Coalition (NCRC)
National Community Stabilization Trust
National Consumer Law Center (on behalf of its low-income clients)
National Disability Rights Network
National Fair Housing Alliance
National Housing Law Project
National Low Income Housing Coalition
National NeighborWorks Association
National Network to End Domestic Violence
National Women's Law Center
Nebraska Housing Developers Association
Neighborhood of Affordable Housing
NETWORK Lobby for Catholic Social Justice
New Haven Legal Assistance Association
New Jersey Citizen Action
NYU Furman Center
Old North St. Louis Restoration Group
Oregon Housing Alliance
PolicyLink
Poverty & Race Research Action Council
Private Equity Stakeholder Project

Prosperity Now
Public Advocates
Public Counsel
Public Justice Center
Public Law Center
RESULTS
Revolving Door Project
San Luis Obispo Legal Assistance Foundation
Southeast Louisiana Legal Services
St. Patrick Center
Staff Attorney / Clinical Supervisor
The Equal Rights Center
The Public Interest Law Project
University of North Carolina at Greensboro
UNCG Center for Housing and Community Studies
Virginia Poverty Law Center
Washington University Law School Civil Rights & Mediation Clinic
Washington University Undergraduate & Graduate Workers Union