



Regulations Division
Office of the General Counsel
U.S. Department of Housing and Urban Development
451 7th Street, S.W. Washington, D.C. 20410

RE: FR-6529-I-01, Revocation of the 30-Day Notification Requirement Prior To Termination of Lease for Nonpayment of Rent

Dear Secretary Turner,

I am writing on behalf of the Chicagoland Apartment Association (CAA), the leading membership organization representing rental housing owners, operators and developers in Illinois. Currently, CAA represents over 250 Illinois member management companies, managing over 315,000 apartment homes.

I am writing to express strong support for the U.S. Department of Housing and Urban Development's ("HUD") Proposed Rule, *Revocation of the 30-Day Notification Requirement Prior To Termination of Lease for Nonpayment of Rent*.

Illinois has long regulated the eviction process in a way that best meets our local community's needs and balances legal protections for both renters and housing providers. Since the pandemic ended, however, federal interference in the localized eviction process has exponentially increased financial strain on renters and affordable housing providers alike. Illinois law requires a minimum five-day notice be served for termination of the lease for non-payment of rent. The current federal 30-Day Notification requirement extends and already lengthy Illinois eviction process that regularly takes over ten months to resolve.

Contrary to our longstanding state and local laws, HUD's previous rules imposed a blanket 30-day notice requirement that continues to add unsustainable delays to an already heavily regulated eviction process. During this extended period of uncertainty, assisted households sink deeper into debt, affecting their credit and future housing opportunities, and covered housing becomes more financially unstable.

Further, HUD-assisted housing operates under razor thin margins due to a unique set of funding and regulatory constraints. Because of continued enforcement of HUD's 30-day

notice requirement in eviction courts, these properties now commonly carry substantial debt unabated which makes them much less desirable assets to investors and discourages utilization of important federal housing programs like Section 8 Project-Based Rental Assistance (PBRA). The result is fewer, quality affordable housing options for renters and their families.

At a time when our country needs more affordable housing, not less, federal interference into the eviction process threatens the long-term stability of our nation's entire housing ecosystem. HUD's Proposed Rule Revocation is an important step to return authority over eviction policy back to states where it belongs and ensure pre-pandemic standards apply uniformly to all eviction cases. CAA respectfully urges HUD to adopt the Proposed Rule as soon as possible.

Thank you for considering our unique perspectives in your important work.

Sincerely,

A handwritten signature in dark ink that reads "Michael J. Mini". The signature is written in a cursive, flowing style.

Michael Mini
Executive Vice President
Chicagoland Apartment Association