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RE: Public Input for FHFA's Strategic Plan: Fiscal Years 2026-2030

To the Federal Housing Finance Agency:

On behalf of the signed national health and medical organizations, we appreciate the opportunity to provide input on the Federal Housing Finance Agency (FHFA) Strategic Plan for Fiscal Years 2026–2030. As the Agency considers strategies to strengthen oversight and promote housing stability, we urge the explicit integration of indoor environmental health—including addressing radon, indoor air quality, and climate impacts—into federally funded multifamily housing programs.

Incorporate Indoor Environmental Health into Risk-Focused Supervision

Strategic Goal 1 emphasizes ensuring the safety and soundness of Fannie Mae and Freddie Mac (the Enterprises) through risk-focused supervision. We recommend that FHFA expand its understanding of “risk” to include environmental health hazards that affect residents, property values and long-term liability of the Enterprises.

Radon exposure remains a significant yet under-addressed risk in multifamily housing. Radon is the second leading cause of lung cancer in the U.S., and its presence in a building can pose both human health risks and financial liabilities.¹ Properties supported by the Enterprises that fail to test for radon or mitigate elevated levels could face increased insurance claims, remediation costs or reputational risk. Including radon testing and mitigation in supervisory assessments aligns with FHFA's mandate to ensure safe and sound operations.

Radon is a known human carcinogen frequently present in indoor environments and hence it can be a hazard for tenants and other occupants of federally financed housing. Therefore, FHFA should, to the extent of its authority, ensure that radon testing, and mitigation of elevated levels, is provided to protect tenants and occupants of all buildings within its purview.

Furthermore, all radon-related work that is conducted in federally insured housing should follow national voluntary consensus standards (VCS). The U.S. Environmental Protection Agency has long supported the use of privately developed VCS to address radon.² These EPA-recognized standards include means of assuring the quality of testing devices and the qualification of radon service providers, as well as radon testing and radon mitigation methodologies appropriate for all buildings.

For example, it is well-understood that radon levels can vary substantially, not only from building to building within a parcel, but commonly from unit to unit within a building. For this reason, the testing protocols should ensure that all ground-contact units (e.g., those located slab-on-grade, above crawlspaces or unoccupied lower levels)—along with a selection of units on upper floors—are tested for radon, and under the proper conditions that will reasonably reflect occupant exposure. This work is best conducted by qualified professionals with at least the minimum necessary training and experience specified by the standards.

Likewise, once elevated levels of radon are confirmed according to the VCS, a mitigation plan should be developed and implemented by a certified or licensed radon mitigation professional in accordance with the applicable VCS for the mitigation indicated.

Indoor air quality (IAQ) challenges, including mold, allergens, combustion byproducts and volatile organic compounds, directly affect tenant health and can exacerbate chronic

¹ U.S. Environmental Protection Agency, Health Risk of Radon, EPA (Feb. 27, 2025), <https://www.epa.gov/radon/health-risk-radon>

² U.S. Environmental Protection Agency, Radon Standards of Practice, <https://www.epa.gov/radon/radon-standards-practice> (last updated Dec. 3, 2024).

conditions such as asthma and chronic obstructive pulmonary disease (COPD).³ Poor IAQ increases healthcare utilization and absenteeism⁴, potentially destabilizing occupancy rates and long-term asset value. Incorporating IAQ into the Enterprises' risk assessments strengthens portfolio resilience and aligns financial stewardship with public health outcomes.

These environmental health risks intersect with other financial and regulatory risks, such as home evaluation and household wealth due to rising costs to heat, cool, and insure homes,⁵ underscoring the need for integrated, risk-based supervision that considers both physical and financial exposures.

Promote Standards for Healthier, More Resilient Housing

FHFA should integrate indoor environmental health and resilience efforts into underwriting, property standards and programs contracted through the Enterprises. Aligning health and resilience objectives enhances long-term asset performance while advancing statutory housing goals.

Energy-efficient building systems, ventilation upgrades and electrification reduce carbon emissions, lower energy costs, and improve IAQ.⁶ These multi-beneficial improvements directly support FHFA's statutory obligations under Objective 1.2 to ensure the Enterprises comply with Affordable Housing Goals, Duty to Serve, and other legal responsibilities. By linking statutory compliance with health- and climate-focused improvements, FHFA can protect residents while strengthening Enterprise portfolios.

Requiring or incentivizing radon mitigation, IAQ improvements and energy-efficient upgrades in multifamily properties ensures that federally supported housing meets both financial and public health standards. Incorporating these measures into the Enterprises demonstrates alignment with statutory duties while enhancing market resiliency.

Leverage Data to Advance Public Health and Housing Goals

Objective 1.2 emphasizes compliance with statutory requirements, while Objective 1.5

³ Ling, Sean H. & van Eeden, Stephan F., *Particulate Matter Air Pollution Exposure: Role in the Development and Exacerbation of Chronic Obstructive Pulmonary Disease*, 4 Int'l J. Chron Obstruct Pulmon Dis. 233 (2009), doi:10.2147/COPD.S5098.

⁴ T. Mkorombindo, J.R. Balmes, A. Custovic & M.T. Dransfield, *The Air We Breathe: Respiratory Impact of Indoor Air Quality in Chronic Obstructive Pulmonary Disease*, 205(4) Thorax 378-380 (2022), <https://pmc.ncbi.nlm.nih.gov/articles/PMC8886942/>

⁵ Federal Housing Finance Agency, *FHFA Strategic Plan: Fiscal Years 2022–2026* (Feb. 2022), available at https://www.fhfa.gov/sites/default/files/discussion_topics/Attachments/1613/FHFA_StrategicPlan_2022-2026.pdf

⁶ Harvard T.H. Chan School of Public Health, *New Methodology Reveals Health, Climate Impacts of Reducing Buildings' Energy Use*, (Sept. 11, 2023), <https://hsph.harvard.edu/news/new-methodology-reveals-health-climate-impacts-of-reducing-buildings-energy-use/>

highlights the importance of reducing unnecessary regulatory burdens. FHFA can advance both by collecting and analyzing data on radon testing, IAQ measures and climate-related building improvements.

Collecting standardized data enables the Enterprises to identify risk concentrations and prioritize remediation without creating additional burdens on property owners or managers. Streamlined reporting tools can reduce administrative inefficiencies, fulfilling Objective 1.5 while supporting statutory compliance. Data-driven supervision allows FHFA to monitor emerging environmental and climate risks in the Enterprises' portfolios, anticipate long-term financial exposures and evaluate progress toward Affordable Housing Goals and other statutory objectives. Transparent reporting also supports cost-effective decision-making by the Enterprises and informs stakeholders, including residents, about the health and climate performance of federally supported housing.⁷

Align Affordable Housing Goals with Health and Sustainability Outcomes

Affordable Housing Goals, Duty to Serve, and other statutory requirements provide a platform to advance healthier, more resilient and more sustainable homes. By incorporating radon testing, IAQ measures and energy-efficient upgrades, the Enterprises can protect residents from preventable health risks while reducing greenhouse gas emissions and utility costs.⁸ Aligning these goals strengthens the safety, soundness and long-term sustainability of the housing finance system.

Conclusion

Integrating indoor environmental health, radon mitigation and resilience into FHFA's Strategic Plan and related objectives will strengthen the safety and soundness of the Enterprises, advance compliance with statutory responsibilities as stated under Objective 1.2, support cost-effective, streamlined supervision aligned with Objective 1.5, and improve health, equity and resilience outcomes for residents of federally supported multifamily housing.

We urge FHFA to explicitly reference these priorities within its strategic plan and supervisory framework. Doing so will ensure that federally supported housing is not only financially sound but also safe, healthy and resilient for the American people.

Respectfully submitted,

⁷ Kenneth T. Gillingham et al., The Climate and Health Benefits from Intensive Building Energy Efficiency Improvements, 7 Sci. Adv. eabg0947 (Aug. 20 2021), <https://doi.org/10.1126/sciadv.abg0947>

⁸ See *supra* note 4

American Lung Association
Asthma and Allergy Foundation of America
Medical Society Consortium on Climate and Health
National Environmental Health Association
National Medical Association
Oncology Advocates United for Climate and Health – International
Physicians for Social Responsibility