

PROVEN ELSEWHERE, POSSIBLE HERE

LESSONS FROM OTHER CITIES TO IMPROVE NEW YORK'S APPROACH TO CODE ENFORCEMENT

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ANHD

ANHD builds community power to win affordable housing and thriving, equitable neighborhoods for all New Yorkers. As a member organization of 80+ community groups across New York City, we use research, advocacy, and grassroots organizing to support our members in their work to build equity and justice in their neighborhoods and city-wide. We believe housing justice is economic justice is racial justice. Executive Director, Barika X. Williams.

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INTRODUCTION

In the 1970s, it appeared a revolution for tenants' rights was underway. After a landmark court case in the District of Columbia gave tenants a legal basis to withhold rent when conditions are not adequately maintained in their unit or the surrounding building, the "warranty of habitability" doctrine was born. It quickly swept the nation, progressing through courts in some states and legislatures in others, with a version of the warranty eventually becoming law in 49 states and the District of Columbia. The New York State legislature enacted its own implied warranty of habitability in 1975. At the time, scholars predicted that empowering tenants in this way would lead to dramatic improvements in the quality of housing.

Yet the revolution never came. In New York City today, tenants who take their landlords to Housing Court for well-documented violations rarely secure repairs and win rent abatements even less often.¹ Worse still, the burden of housing problems is not evenly distributed across the city, with neighborhoods of color, facing higher rates of issues.² For ANHD members, this has long been apparent – our report *Inequitable Enforcement*, released over 20 years ago, highlighted nearly the same inequitable concentration of housing problems that we see today, with tenants in the Bronx, Upper Manhattan, and Central Brooklyn dealing with significantly higher violations per unit than the rest of the city.³

The challenges of housing maintenance are complex, and the problems with New York City's current enforcement system have become deeply entrenched. Although the City has introduced numerous programs to intervene in neglected properties since ANHD's initial report, the fundamental challenges persist: too many landlords neglect repairs or make superficial corrections, and those who are found to have violated habitability laws rarely face meaningful consequences.⁴ As a result, tenants have lost faith in the system.

Mayor Mamdani's administration has made improving the City's code enforcement system as a tool for preserving existing housing a central focus of its recently released housing plan, *Block by Block* – and the plan pursues this with greater emphasis than any mayoral housing plan in recent memory. While much of the plan centers on ad hoc initiatives, the focus on overhauling the system is welcome, and the urgency of reform has never been clearer, as violations climb, fatal building fires spike, and federal repression forces many tenants into the shadows.⁵ Solving these challenges will require a multifaceted approach that translates these initiatives into long-term programs. To protect tenants and preserve lower-cost homes, we must rethink how we empower City agencies to enforce the housing maintenance code, foster collaboration across agencies and community organizations, ensure that punishments are sufficient to deter non-compliance, and drive repeat offenders out of business. As advocates and policymakers consider changes to the code enforcement system as we know it, New York City can learn from the experiences of other jurisdictions. To that end, this report lays out an overview of code enforcement practices, including those in New York City, then presents a series of case studies from other jurisdictions in the US and internationally that can inform efforts to improve the system here in NYC.

Executive Summary and Key Findings

To frame the policy choices available to New York City as it considers reforms to code enforcement systems and programs, this report first describes the different approaches to enforcing housing maintenance laws. These approaches fall into a few key categories:

- **Theory of enforcement:** do they partner with cooperative landlords, punish bad actors, or blend the two?
- **Mechanisms to address non-compliance,** which may be civil, administrative, or criminal
- **How inspections are triggered:** are they purely by complaint or part of a systematic and proactive approach?
- **Policy priorities** embedded in inspection programs and housing codes, which will vary depending on local housing market conditions and other factors

New York City's theory of enforcement blends partnerships and punishments: a variety of programs help landlords maintain housing quality, while punitive programs enforce compliance — though crucially these punishments are often waived. This is at least partly because the City relies on a civil mechanism to address landlord non-compliance, requiring the Department of Housing Preservation and Development and the Law Department to seek penalties in court. With limited exceptions, inspections are reactive: the City learns of most housing maintenance code violations via reports to 311 by tenants rather than surfacing them proactively.

As it currently stands, this system is deeply flawed — particularly for low-income tenants, tenants whose primary language is not English, and tenants in the Bronx, Upper Manhattan, and Central Brooklyn. With an eye toward improving the system, especially for the most marginalized tenants who have confronted neglect and predatory behavior for years, this report presents case studies from five other jurisdictions. Although each would have to be adapted to New York City, all offer insight into how we can tackle problems plaguing tenants in the five boroughs. The following key findings and recommendations emerge from those case studies.

Key Finding 1: Administrative enforcement mechanisms facilitate clear and effective consequences.

In Camden, a borough of London, England, the agency charged with overseeing private rental housing is empowered to impose significant penalties and to revoke licenses for landlords with a pattern of harmful behavior. Public guidance documentation increases transparency and minimizes discretion.

- Recommendation 1:** Create an administrative path for HPD to enforce penalties and consequences for housing maintenance code violations.
- Recommendation 2:** Publish clear guidance describing circumstances under which penalties should be increased or decreased.
- Recommendation 3:** Explore increasing penalties, particularly for immediately hazardous violations, to improve their effectiveness as a deterrent.
- Recommendation 4:** Require landlord licenses, to increase the enforcement tools available to HPD.

Key Finding 2: Targeted, systematic, proactive inspections are an important complement to complaint-based systems.

Both Los Angeles, CA and Seattle, WA operate systematic inspections of all rental housing. These programs increase the local government's reach and ability to uphold housing standards, relieve tenants of the burden of reporting problems, and have the potential to foster better partnerships between the enforcing agencies and landlords as well as tenants. To effectively use government resources, targeting is important – while comprehensive coverage is desirable, San Francisco's case shows that leveraging community input and building data will make efforts more efficient.

- Recommendation 5:** Develop a new, permanent model for targeted, cyclical, proactive inspections, drawing on Seattle and Los Angeles' systematic inspection programs, the community-centered design used in San Francisco, and initial lessons from "Fix the City" and other targeted enforcement initiatives.

Key Finding 3: Agencies can design programs that help tenants benefit from the theoretical potential of the warranty of habitability.

When landlords fail to make repairs, Los Angeles provides an administrative pathway for tenants to divert rent to escrow accounts and to award tenants a rent reduction and rent freeze. Administrative rent escrow and rent reduction programs can be a powerful consequence for negligent landlords and provide concrete benefits to tenants forced to endure poor conditions, helping to make the warranty of habitability real.

- Recommendation 6:** Study administrative rent escrow and rent abatement programs in Los Angeles and other municipalities to inform programmatic reform in New York City.

Key Finding 4: Interdisciplinary inspection teams can generate strong enforcement outcomes.

LACDPH's experience leading LA County's RHHP system of proactive inspections shows the value of integrating diverse expertise into code enforcement teams. Deploying community health workers alongside inspectors brings a broader set of skills to bear on the complex problems and relationships involved in code enforcement, contributing to an 85% compliance rate upon first reinspection.

- Recommendation 7:** Continue to improve interagency coordination and consider creating permanent cross-agency inspection teams.

Key Finding 5: Partnerships between agencies and community organizations can alleviate the burden on agencies and lead to better targeting of resources.

For 30 years, San Francisco has operated a community partnership program with landlord and tenant groups. This longstanding partnership allows a meaningful share of housing problems – approximately 11% of all complaints – to be addressed before reaching the department. DBI reports that the program also helps surface problems it might not otherwise learn about, letting the department direct its enforcement resources toward the buildings and cases that need them most – particularly in lower-income and non-English-speaking communities, where housing problems are most likely to go unreported in the first place.

- Recommendation 8:** Partner with organized tenants to inform enforcement strategies.
- Recommendation 9:** Expand funding for Partners in Preservation and related programs.
- Recommendation 10:** Explore a system of information, referrals, and counseling that establishes a direct link between community partners and HPD.

Background: Frameworks of Code Enforcement Systems

Code enforcement is the process by which local authorities ensure that residential properties meet established health, safety, and habitability standards – as enshrined in local and state laws. Local authorities have the power to investigate complaints, conduct inspections, and issue notices or penalties to landlords and property owners who fail to maintain their properties in compliance with the relevant codes. These standards typically cover areas such as structural integrity, sanitation, heating, pest control, and the general condition of a property, with the ultimate goal of preventing or correcting unsafe or substandard living conditions as well as preventing properties from falling into blight. To attempt to maintain quality rental housing for residents, governments harness a variety of overlapping approaches. Code enforcement programs and the systems they are part of can be categorized in a few ways:

- **Theory of enforcement:** do they partner with cooperative landlords, punish bad actors, or blend the two?
- **Mechanisms to address non-compliance,** which may be civil, administrative, or criminal
- **How inspections are triggered:** are they purely by complaint or part of a systematic and proactive approach?
- **Policy priorities** embedded in inspection programs and housing codes, which will vary depending on local housing market conditions and other factors

Code enforcement systems and the programs that comprise them will vary along these scales according to the problems faced, the resources available to the enforcing agency, and the level of capital investment in the housing stock.

The problem of quality is particularly acute and longstanding in low-cost housing. Tenants seeking low-cost housing are more likely to have fewer options and to be financially precarious: in New York City, vacancy rates for low-rent housing are below 1%.⁶ If tenants fall behind on rent, they face the risk of eviction. As previous ANHD research has demonstrated, some landlords exploit this precarity to reduce maintenance and operating costs and increase profits.⁷ Although the presence of the “warranty of habitability” means that poor housing conditions theoretically serve as a defense against eviction, tenants are rarely able to effectively exercise this defense in practice.⁸

Theory of enforcement - partner or punish?

To prevent or respond to violations of housing maintenance codes and general lack of compliance, there are two general approaches to enforcement: partner with landlords to maintain compliance with “carrots” (incentives) or punish bad actors to deter landlords from falling out of compliance.

Localities may pursue a cooperative theory of maintenance, partnering with landlords to incentivize and support compliance with housing maintenance codes. Some localities partner with willing landlords by offering direct subsidy in the forms of grants or low- or zero-interest loans for specific types of projects or by providing tax abatements conditioned on completion of proactive maintenance or upgrades. Jurisdictions may also provide education, guidance, or technical assistance to help landlords understand their obligations, identify any resources available to maintain their properties, and even to help plan out scopes of work for projects. By offering financial resources and other forms of support, local governments attempt to encourage landlords to maintain their properties and make it more likely that they are able to do so.⁹

Alternatively, enforcing agencies can focus on punishing violations of housing laws, — with the primary goal of deterring violations from occurring in the first place and the secondary goal of holding violators accountable. One form of punishment is a direct monetary penalty imposed by a court or administrative tribunal; in some cities, unpaid penalties are converted to liens on the relevant property — a legal claim against the property, attaching to and “clouding” the title, that makes it difficult to sell or to refinance a mortgage until the penalty debt is settled. Other forms of punitive approaches include providing a path for tenants to secure reduced rents when repairs are not made, enabling tenants to place rent in escrow while units are in violation, or allowing agencies to make repairs directly (or appoint an administrator to do so) in buildings where conditions have deteriorated and to garnish rents or apply liens to cover these costs. These types of strategies are most effective when punishments are clear, meaningful, and prompt in their application. A penalty’s severity should bridge the gap between the cost of compliance and the potential harm from a violation: where remedying a violation is affordable relative to the harm it prevents (e.g. covering exposed wires), steep penalties drive landlords toward the optimal outcome.¹⁰ Punitive policies also operate along a gradient: confronted with non-compliance, governments may focus on achieving total compliance across all properties or on channeling resources to target the worst offenders.

Without careful design, one theory of enforcement can crowd out the other, but, increasingly, local governments blend theories of cooperation and punishment-based deterrence as part of “strategic code enforcement.” This approach targets resources where they will be most effective at resolving substandard housing: applying cooperative approaches with landlords with a good track record or demonstrated good faith efforts to comply and enforcing punitive consequences for landlords who reveal themselves to be recalcitrant or absentee. Jurisdictions can draw on data — including building age, complaints, violations, court cases, ownership history, and finances — alongside community input to identify landlords or types of properties where particular code enforcement tools will be most impactful. Applying an equity lens to this data helps ensure that resources are directed to landlords who genuinely lack capacity to comply (but who may need guidance and resources), rather than penalizing under-resourced landlords while letting well-resourced bad actors evade consequences.¹¹

Approach	Tactics	Pros	Cons
Partner / Cooperate / Support	- provide information about code requirements - provide funding or loans - offer flexible timelines for repair work	- ensures landlords have access to necessary resources - can reduce resistance to compliance	- often resource-intensive - may misallocate resources
Punish / Deter	- penalties - criminal cases	- severe enough penalties should reduce the need for active enforcement - can be resource-positive	- may punish actors who simply need education - problems may fester
Strategic Enforcement	- provide resources and education to compliant landlords and/or those who demonstrate meaningful effort to comply - apply increasingly punitive measures to landlords who demonstrate persistent and/or willful non-compliance - leverage diverse quantitative and qualitative data to proactively identify buildings at-risk of physical distress	- allows better targeting of resources - distinguishes bad faith actors from good faith	can be complex to implement

Enforcement mechanisms

Within the spectrum of punishment-based approaches, housing maintenance code enforcement systems may differ in their mechanisms for penalizing non-compliance. As discussed above, under many housing codes, landlords who fail to maintain their properties to an established standard can face consequences, including financial penalties, loss of eligibility for programs, and revocation of permits or licenses. The route to impose these consequences varies from place to place, however, and can follow two different paths: either civil or administrative.

In the civil process, when a landlord is in violation of the housing maintenance code, the enforcing agency or another party with standing can take the landlord to court to seek the imposition of penalties or injunctive relief. Often the court process includes negotiated settlements with plans for repairs and payments of penalties, with significant discretion available to the presiding judge. Crucially, these repair plans may be difficult to enforce and unpaid penalties may remain difficult to collect, requiring further court action. Civil courts may also issue orders to place rent in escrow, or provide a rent abatement for a tenant, until repairs are completed.¹²

Where an administrative path is available, due process for the owner is preserved but the process is inverted – as with a parking ticket, a penalty or consequence is imposed in advance but is challengeable at an administrative hearing. This allows the enforcement process to start automatically and shifts the initial burden of action from the enforcing agency to the landlord.¹³ While some administrative processes incorporate discretion in the application of fines, it is more feasible to set guardrails on discretion in these settings.¹⁴ Compared to civil and criminal processes, administrative hearings can also be more affordable, as salaries for the relevant positions are often lower and timelines can be better contained. Agencies with access to administrative mechanisms may also have authority to – without a court order – reduce a tenant's rent until repairs are made and direct that rent be held in escrow. Additionally, some jurisdictions require landlords to hold a license to rent out properties, which can be revoked for consistent neglect or other predatory behavior or failure to pay municipal debts, providing an additional path for administrative enforcement beyond monetary penalties.¹⁵ Suspension of licensing may also result in restrictions on a landlord's ability to evict.¹⁶

Lastly, criminal trials offer a third mechanism for penalizing non-compliance. Typically reserved for the most egregious cases, these are less representative of code enforcement policy broadly.¹⁷

Process	Tactics	Pros	Cons
Civil	court cases to seek consequences (penalties, abatements, or other)	- discretion - potential for additional penalties	- agency or tenant need to initiate the case - only the most egregious cases are pursued can result in disparate outcomes - more formal - costs typically higher (salaries for lawyers, judges)
Administrative	administrative tribunals to seek consequences	- shifts burden to landlord to dispute violation - typically faster - keeps process in-house for agency - costs typically lower for administrative staff - easier to re-direct penalties to specific purposes - easier to minimize discretion and disparate outcomes - typically less formal than civil or criminal, increasing access	- requires more agency and/or tribunal staff - may require state law changes - different transparency requirements
Criminal	jail time	- theoretically strong deterrent - different type of consequence, which may be more effective for some landlords than financial penalties alone	- high burden of proof - resource intensive - reinforces carceral response

Inspection triggers: reactive and proactive

Habitability problems in existing homes are generally approached in 3 ways: through resident complaints that lead to inspections, through proactive inspections that occur at a regular cadence, or a combination of the two.

A reactive, complaint-based program primarily responds to problems after they are reported by the tenant. Such a program has certain efficiencies: in theory the enforcing agency is only asked to deal with the problems that are disruptive enough to warrant complaint. In reality, however, many problems are not identified under a complaint-based system. For one, it requires tenants to know their rights and be able to exercise them to report problems that arise. For a variety of reasons this may not happen. Lack of awareness of what constitutes a violation and of a local government's role in enforcing the housing maintenance code, a fear of retaliation from their landlord, concerns about interaction with government agencies, and a sense of hopelessness that reporting the violation will lead to any meaningful change are just some of the possible reasons a tenant might not report a problem, even in places like New York with robust government outreach and legal protections for tenants.¹⁸

Proactive inspections seek to shift this dynamic by creating a system for inspecting properties that does not rely on complaints, ensuring that tenants do not bear the full burden of identifying violations and that more housing problems are identified before they become dire. Paired with clear communication between landlords, enforcing agencies, and tenants, proactive inspections can enhance trust across all parties by creating a space for identifying problems and planning comprehensively to address them.¹⁹ When proactive inspections are conducted at the building-level and in partnership with tenants, they can be particularly effective – allowing for coordinated scheduling that does not require each tenant to be home and for holistic planning for repairs and interventions.²⁰ Different jurisdictions prioritize different habitability standards in their proactive inspections – some run through a core checklist of the most concerning items while others inspect for every possible violation.²¹ Proactive inspections can be citywide, or they can be targeted based on geography, building risk factors, or by using complaints data to identify problem properties for regular inspection.

To be comprehensive and maximally effective, proactive inspection systems require a well-maintained registry of rental properties. As experts at the Center for Community Progress put it, “you cannot inspect what you cannot find” — properties must be identified as rentals to be placed on a list for inspection. The broader the coverage of a proactive inspection program, the more important a registry becomes. Additionally, rental registries can help agencies establish initial contact with landlords, creating pathways for accountability.²²

Approach	Tactics	Pros	Cons
Reactive / Complaint	■ triage-style call centers	■ theoretically, targets resources where they are most pressing	■ burden is on tenants to report, which may lead to underreporting ■ by definition, not comprehensive ■ hard to fit into a broader enforcement strategy
Proactive / Cyclical	■ property registration databases ■ random scheduling of inspections, within a certain timeframe ■ prescribed fee-based funding	■ relieves tenants of the reporting burden ■ increased government awareness of existing issues ■ greater public awareness of government role in addressing housing issues ■ can be used to position government as a partner in resolving housing issues	■ if all units are subject to inspect, resources may be diverted to less urgent needs

Policy focus

Code enforcement systems deal with interior and exterior conditions of buildings. Some jurisdictions may emphasize a focus on blighted properties whose conditions may negatively affect neighbors and their properties. Others may focus on minimum habitability standards, harnessing codes to ensure that housing is healthy and safe for residents, particularly tenants.²³ At different times or in different areas, each policy focus may be valuable to a locality.²⁴ For example, from the 1960s through the 1990s, abandoned buildings were relatively commonplace in New York and the City had to devise tools to deal with these symptoms of disinvestment; as the abandonment crisis eased, the City shifted its focus.²⁵ And of course, different areas within each city will face different challenges, often requiring different policy responses.

Code Enforcement in New York City

New York City's code enforcement system has evolved over the decades to combine various approaches, reflecting the interests of both the landlord lobby and the organized tenant movement.

New York City's theory of enforcement is a blend of partnerships and punishments, with a variety of partnership-oriented programs designed to help landlords maintain housing quality alongside punitive programs to enforce compliance, though crucially these punishments are often waived. This is at least partly because the City relies on a civil mechanism to address non-compliance, with the Department of Housing Preservation and Development and the Law Department required to seek penalties against offending landlords in court. With limited exceptions, inspections are triggered by complaint: the City learns of most housing maintenance code violations via reports to 311 by tenants and reacts to problems rather than surfacing them proactively.

Oversight and enforcement for housing problems are diffused. Responsibility for addressing housing problems faced by tenants is spread across five agencies, each of which oversees and enforces a different but overlapping set of housing-related issues:

- the Department of Housing Preservation and Development (HPD) enforces the Housing Maintenance Code;
- the Department of Buildings (DOB) enforces the Building Code and rules related to construction;
- the Department of Health and Mental Hygiene (DOHMH) enforces the Health Code and other public health issues;
- the Department of Environmental Protection (DEP) enforces codes related to environmental issues, including those related to sewage and drinking water;
- and the Fire Department (FDNY) enforces fire-safety rules in the Fire Code.

In specific circumstances, agencies are required to coordinate – for example HPD coordinates with DOHMH around pests and mold, with DOB to resolve elevator issues, and with DEP on drinking water contamination. The different agencies have different enforcement tools and mechanisms available to them, as described below.²⁶

The inspection system in New York is primarily a complaint-based one. The system is designed for tenants to report housing problem(s) first to their landlord, and, if steps are not taken promptly to remedy the problems, they can escalate by contacting the City via 311. If the problem may constitute a violation of the City's Housing Maintenance Code or other relevant codes, the report is routed to the relevant agency or agencies, and an inspection date is set depending on the severity of the described problem. If, upon inspection, a violation is identified, the relevant agency is responsible for informing the landlord of their obligation to remedy it and for enforcing consequences if they fail to do so.

Most agencies have access to administrative enforcement mechanisms; HPD, in large part, does not, and is forced to rely on civil enforcement. When landlords do not comply with their obligations under the relevant codes, New York City's primary method of enforcement is penalties and fees.²⁷ Most penalties related to housing maintenance code violations are only collectible through Housing Court, requiring the City to file civil cases against delinquent landlords. Given the level of effort involved to collect these and an overstretched Housing Litigation Division, the City functionally forgives many penalties.²⁸ It's also worth noting that housing code violations are something of an outlier in their collection process. While the City places a lien on the property's tax bill for most unpaid penalties issued by agencies including DOB and DEP, it does not do so for HPD penalties.²⁹ If unpaid, liens can be collected when a building is sold or provide a path for the City to foreclose on a property and transfer it to new ownership – excluding HPD penalties from lien collection greatly weakens their effectiveness as a deterrent.³⁰

Though the system primarily relies on complaints to identify issues, there are a few programs in New York that involve some degree of proactive oversight:

- | Initially announced in 2011, the Proactive Preservation Initiative was designed to identify buildings at risk of deterioration before physical conditions reached crisis levels.³¹ Now reconstituted as Partners in Preservation, the program aims to support tenant organizing as a tool to identify and address building conditions.³²
- | HPD conducts annual inspections of apartments leased with federal vouchers to ensure they meet the standards for the program and the City's mandatory inspection items. The Department of Social Services (DSS) conducts pre-clearance inspections for apartments rented with city vouchers.³³
- | The Alternative Enforcement Program (AEP) and the Certificate of No Harassment (CONH) program both identify buildings based on physical conditions and/or risk factors and apply additional scrutiny and enforcement.³⁴
- | In response to recent City Council legislation, DOB launched a risk-based proactive inspection program that, in Fiscal Year 2025, accounted for 30% of enforcement inspections.³⁵
- | Other previous or ad hoc programs with a proactive element include the Targeted Cyclical Enforcement Program (T-CEP), which informed the initial vision for AEP, and the interagency task forces facilitated by Brooklyn Borough Reynoso's office in North Brooklyn and East Brooklyn.³⁶

The City also has various financial incentives for landlords to maintain the units they own. Notably, the J-51 program, which offers tax abatements and exemptions to landlords who perform significant rehabilitation, has been in place in one version or another since 1955.³⁷ In partnership with community groups, HPD offers a range of programs to specifically support small property owners – initiatives like HomeFix, which offers grants and low- and no-interest loans to owners of 1-4 family homes.³⁸ More recently, the City piloted Unlocking Doors, a joint initiative between HPD and the Department of Social Services, which aims to compensate landlords who repair vacant units and lease to a tenant using a city housing voucher (the program has, so far, seen minimal participation from landlords).³⁹

CASE STUDIES

The outcomes of New York City's current patchwork system are poor. National rankings using American Housing Survey data place New York near the bottom of studied US cities (48th out of 51) for housing health and quality.⁴⁰ Housing problems occur much more frequently and are more likely to persist in New York's poorer communities and communities of color.⁴¹ Council-mandated evaluations of AEP, the City's signature enforcement program, reveal modest success in the aggregate but an inability to shift conditions in the most challenging buildings.⁴² As housing violations climb year-over-year, neglected properties languish in disrepair, and predatory landlords remain in business, many tenants have lost faith in the system. Though the City's primary method for identifying housing problems are complaints received through the 311 system, tenants in buildings with persistent problems often feel it is futile to file these 311 reports, leading to an underreporting of problems. There is much to be done to improve New York City's code enforcement system so that it works equitably and effectively for tenants.

Recognizing that there are different, promising approaches underway in other localities, we researched programs in other areas and consulted with experts outside the city. Where possible, we focused on cities with large populations, aging housing stock, and/or high proportions of renters. Through a series of interviews with over 25 people across six jurisdictions (including agency and legislative staff, property managers, and advocates), we sought to understand key elements of their various approaches to code enforcement and to identify mechanisms and programs that could support or improve the existing code enforcement system in New York City. There is no one solution or silver bullet to achieve effective code enforcement, but the case studies below highlight practices worthy of consideration and constitute the primary source for this report's key findings and recommendations.

AN EMPOWERED AGENCY: CAMDEN'S PRIVATE SECTOR HOUSING SERVICE

The United Kingdom has a national policy framework for private rental housing, which includes the Housing Health and Safety Rating System (HHSRS) – a system for scoring housing quality and identifying homes where tenants are at risk. The national framework requires licensing for landlords for 5+ units homes but allows local governments to implement “discretionary licensing schemes for smaller shared housing and/or rented accommodation.”

Statutes establish penalties for non-compliance with housing standards but allow local discretion on implementation and staffing.⁴³

Within the scope of this framework, Camden, an inner borough of London, takes a comparatively strong approach to maintaining housing standards. According to Darren Wilsher, Manager of the Private Sector Housing Service (PSHS), the entity charged with enforcing housing maintenance laws, Camden “makes use of all tools available” – applying some of the more assertive techniques available and robustly funding the agency tasked with private sector housing quality through recovered fines and fees.⁴⁴ The PSHS exemplifies the potential impact of administrative mechanisms.

Camden's Penalties

If an inspector with Camden's PSHS identifies a deficiency in housing quality, they will notify the landlord directly in an attempt to resolve the issue quickly. In the 10% of cases that are not resolved by the landlord, they will start the formal enforcement process by issuing an Improvement Notice. If, upon reinspection, the landlord has not complied with the Improvement Notice, the agency will issue a Notice of Intent to impose a penalty. This notice kicks off a 28-day period “during which the recipient can submit any representations they have concerning the proposed fine.” Depending on the information received, the PSHS may then impose the fine or a modified version, at which point that landlord may still appeal to a tribunal with the power to confirm, adjust, or cancel the notice.⁴⁵ If no appeal is made, or if any amount is confirmed following the appeal, payment becomes mandatory. Should the landlord fail to pay, they can be taken to court to enforce the debt; a statement of nonpayment provided by the agency is treated as conclusive evidence, enabling a variety of debt recovery measures and making recouping of payment all but certain.⁴⁶

To promote “transparency and consistency in the imposition of financial penalties,” the Private Sector Housing Service has published a public policy document outlining the civil penalties applicable for varying offenses related

{ ENFORCEMENT THEORY:
PUNISHMENT-BASED DETERRENCE }

{ ENFORCEMENT MECHANISM(S):
ADMINISTRATIVE }

{ INSPECTION TRIGGER:
PROACTIVE OR REACTIVE }

In Camden, a borough of London, England, the agency charged with overseeing private rental housing is empowered to impose significant penalties and to revoke licenses for landlords with a pattern of harmful behavior. Public guidance documentation increases transparency and minimizes discretion. Applying the framework above, Camden's policies emphasize a punishment-based deterrence strategy with administrative enforcement mechanisms, and, while the City harnesses some proactive strategies for identifying violations, most housing problems are identified reactively through complaints.

to the maintenance and provision of quality rental housing. Recognizing that not all violations of housing codes will be discovered at any given time, Camden has established substantial starting civil penalties to “create an environment where it is clear ... that operating unlawfully as a landlord will be financially disadvantageous when compared to operating lawfully.” For instance, failing to comply with an Improvement Notice is considered a “Severe” offense and penalties start at £22,500 (~\$30,225). Depending on the number of hazards present, and the level at which they are rated (Category 1 or 2), the penalty amount may be increased. As of June 2026, local authorities are also able to issue a £7,000 fine for having to issue an Improvement Notice, “adding to the incentive that landlords should be proactive in providing accommodation that meets minimum standards and responding to tenant complaints promptly.”⁴⁷

This policy document details the starting penalty level for different types of violations and various factors that can lead to the adjustment of the final amount. The Camden Council permits the adjustment of penalties based on “aggravating and mitigating factors...including, but not limited to...the track record and culpability of the landlord,” the likelihood of harm to residents, and the size of a landlord’s portfolio. Adjustments based on these factors only exceed £5,000 in rare instances under “exceptional circumstances.” To incentivize prompt payment, landlords also can receive a 15% discount for paying fines within the relevant timeframe (28 days).

With the updated, standalone policy guidance in place, agency staff report that it has become significantly easier for officers to both follow the policy and to justify their decisions at tribunal. The publicly-available document provides a clear rational basis for penalty determinations, with well-defined starting points. Aggravating and mitigating factors are also much more quantified than before, reducing ambiguity and helping establish consistency across decisions.⁴⁸



An inspection team in Camden speaks with a tenant. Source: [Chartered Institute of Environmental Health](https://www.anhd.org).

Seriousness of offense	Starting level [£]	Starting level [\$ equivalent]
Mild	2,500	3,350
Moderate	7,500	10,075
Serious	12,500	16,800
Very Serious	17,500	23,500
Severe	22,500	30,225
Very Severe	27,500	36,950

Disrupting bad actors' predatory practices

Camden requires landlords in multifamily housing (3+ units) to possess a license to rent out housing.⁴⁹ Requiring landlords to be licensed to rent out property provides an additional enforcement lever: Camden can provide longer license terms to landlords with good track records, shorter terms when a landlord has a mixed track record, and, in the case of repeated or prolonged non-compliance, the Private Sector Housing Service can revoke a landlord's license.⁵⁰ Typically a tactic of last resort, revoking a license involves placing the property in the care of another qualified ("fit and proper") landlord or under interim management by the borough itself – a tactic that is currently only employable in New York following a lengthy foreclosure or court process.⁵¹

Overall, Camden's system is designed to ensure meaningful deterrence and to provide a clear structure that facilitates swift enforcement. This clarity, along with a strong partnership with the Finance team, is a big part of the reason why Camden collects penalties at a high rate – 70% of the imposed fine – and given that the policy guidance has been recently revised and improved for clarity, that rate may well increase.⁵² (In New York, comparable estimates range from less than 1% of penalties for known instances of false certification, which are not lienable, to 50% of OATH fines, which are lienable).⁵³ Collection rates matter because deterrence only works if the consequence is real; an uncollected penalty is, in practice, no penalty at all. This administrative approach succeeds as a deterrent: the vast majority of landlords repair violations without Camden escalating to formal enforcement.

GETTING IN THE DOOR: CYCLICAL SYSTEMS FOR INSPECTION IN SEATTLE AND LOS ANGELES

Around the country, many cities have developed or are developing systems for proactive inspections to ensure rental housing complies with local housing codes.⁵⁴ Notably, Los Angeles has had a program to inspect all rental units since 1998 and Seattle since 2014.⁵⁵

Los Angeles' Systematic Code Enforcement Program (SCEP) is nearing its 30th year in operation. Managed by the Los Angeles Housing Department (LAHD), the program aims to inspect each of Los Angeles' nearly 900,000 rental units at least once every 4-5 years.⁵⁶ Properties with a high risk for violations or an otherwise problematic track record (labeled in the local system as "Tier 2" properties) are prioritized for more frequent inspections. In 2025, the City Council passed moderate reforms to the program.⁵⁸

Seattle's Rental Registration and Inspection Ordinance (RRIO), operated by the Department of Construction and Inspections (SDCI), is newer than SCEP but has similarly broad coverage. All registered rental properties – about 190,000 across 28,000 properties – are selected for RRIO inspection once every 5-10 years.⁵⁹ If violations are found during the inspection, landlords are given a timeline for compliance and will be subject to enforcement consequences if they do not meet the deadline.

Aside from the difference in inspection frequency (every 4-5 years in LA and every 5-10 years in Seattle), the programs also differ in what they inspect and how they assign code enforcement staff. LA's SCEP inspections cover the full swath of potential housing violations, whereas Seattle's RRIO inspections focus on a subset of violations to establish a minimum standard for housing safety.⁶⁰ Los Angeles has dedicated teams for SCEP and for responding to complaints, but inspectors in Seattle split their weeks into RRIO and complaint-based inspection days, allowing for cross-pollination across the programs.⁶¹

As the number of proactive inspections is predictable year-to-year, both cities are able to fund their program through an annual dedicated registration fee on rental properties. Los Angeles charges on a per unit basis, and Seattle per property. Both jurisdictions have had to increase fees over the years to keep up with program costs – a recurring challenge with a fixed revenue source.⁶²

{ ENFORCEMENT THEORY:
PUNISHMENT-BASED DETERRENCE OR
PARTNERSHIP }

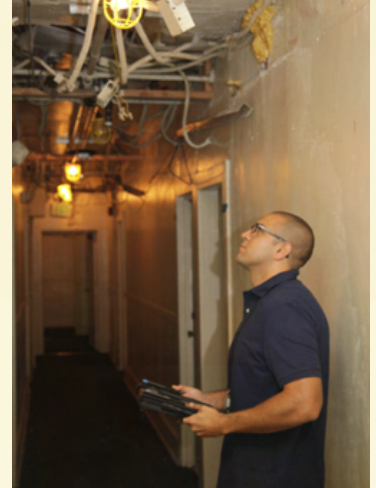
{ ENFORCEMENT MECHANISM(S):
ADMINISTRATIVE OR CIVIL }

{ INSPECTION TRIGGER: PROACTIVE }

Both Los Angeles, CA and Seattle, WA operate systematic inspections of all rental housing. These programs increase the local government's reach and ability to uphold housing standards, relieve tenants of the burden of reporting problems, and have the potential to foster better partnerships between the enforcing agencies and landlords as well as tenants. Assessed using the framework outlined above, systematic inspections sit in the middle of enforcement strategies, providing opportunities for partnership by identifying problems en masse and deterring violations by building an evidence base to support, if needed, punitive action. They fit well within a strategic code enforcement program, as they provide opportunities for initial partnership and for punishment if corrections are not made. Cyclical inspections can feed into an administrative or civil enforcement mechanism. They are decidedly proactive, rather than reactive.



An SCDI inspector conducts a RRIO inspection. Source: [SDCI](#).



An inspector observes conditions during a SCEP inspection. Source: [LAHD](#).

Tradeoffs

Proactive inspections come with a key downside: in the pursuit of equal and comprehensive coverage, they may pull inspectors to homes without meaningful issues – stretching resources beyond what is necessary.⁶³ And while proactive inspections relieve tenants of some of the burden of reporting housing issues, in the absence of thoughtful outreach interventions, marginalized tenants may still fear government interaction.⁶⁴

Leaders in both jurisdictions, however, cite the value of proactive inspections in multiple ways. These systems are successful at surfacing violations they might not have learned about otherwise, supporting each department's efforts to ensure a minimum standard of habitability. Proactive systems also increase public understanding of the role of enforcing agencies – SDCI reports that awareness of complaint-based systems grew as RRIO's proactive program was implemented.⁶⁵ In LA, especially in the Tier 2 properties mentioned above, SCEP inspections can offer an organizing opportunity for tenants to ensure a mass documentation of habitability concerns at one time; for landlords this also allows repairs to be consolidated and addressed comprehensively, rather than individually, which can reduce costs and administrative burden. Likewise, for tenants at risk of eviction, SCEP inspections provide tenants with good, well-organized habitability evidence; in addition to serving as an affirmative defense against eviction, this type of evidence is powerful in a jury trial, which have become more common as a tool for eviction defense in California in recent years, giving the landlord reason to negotiate when they might not otherwise.⁶⁶

PROVIDING RELIEF TO AFFECTED ANGELENOS: LA'S RENT ESCROW PROGRAM

The key enforcement component in Los Angeles' code is the Rent Escrow Account Program (REAP). Through an administrative process, the program provides tenants in units with habitability violations with three key tools: tenants who enroll can pay their rents to a City-managed escrow account rather than their landlord, secure rent reductions of up to 50% depending on the severity of the violations, and benefit from a rent freeze — landlords cannot raise rents while a unit is in REAP and for one year after it exits.⁶⁷ In a given year, 2,500-3,500 units are in REAP, roughly 3-4% of the citywide rental stock.⁶⁸

Properties are referred to REAP when landlords fail to remediate violations within the required timeline. After referral, an administrative hearing is held where the owner of the unit is afforded due process to challenge the REAP placement, and the department and tenants may present evidence of conditions. Depending on the results of the hearing, the property may be placed in REAP, with specific units designated as affected and eligible for escrow accounts, a rent freeze, and rent reductions. Barring a successful appeal, a property can only exit REAP after an inspection confirms full compliance with orders from City agencies and debts owed to the City's Department of Water and Power are paid, at which point LAHD will refer the property to be discharged from the program via vote at City Council.⁶⁹

The typical REAP unit exits the program within 4-6 months, and it is not common for units to return to REAP after exiting — an argument for the program's success. The department takes precautions to reduce the likelihood of return, requiring the landlord to pre-pay for monitoring, with two inspections in the first year after the unit exits.⁷⁰ As an enforcement mechanism, REAP has notable shortcomings, but the program also offers concrete benefits to tenants who participate.

{ ENFORCEMENT THEORY:
PUNISHMENT-BASED DETERRENCE }

{ ENFORCEMENT MECHANISM(S):
ADMINISTRATIVE }

{ INSPECTION TRIGGER:
PROACTIVE OR REACTIVE }

When landlords fail to make repairs, Los Angeles provides an administrative pathway for tenants to divert rent to escrow accounts and to award tenants a rent reduction and rent freeze. Administrative rent escrow and rent reduction programs can be a powerful consequence for negligent landlords and provide concrete benefits to tenants forced to endure poor conditions, helping to make the warranty of habitability real. As a program, REAP fits within the strategy of punishment-based deterrence, and is a tool used in an administrative enforcement mechanism. Cases for REAP can be generated via proactive or reactive inspection.

Shortcomings

REAP is not successful at promptly compelling repairs from every property owner. For a variety of reasons, some units remain in REAP for a prolonged period — such as when a landlord is absent and unresponsive or otherwise incapacitated, or where other factors present legal complications (like an illegal garage conversion). The program is also less successful in dealing with cases where a landlord may be willing to sacrifice rental income in the short term in the hopes of securing higher rents in the long term. Though most units in Los Angeles are subject to rent control (~75% of rental units are eligible), California permits landlords of rent controlled apartments to reset rents at the start of a new tenancy.⁷¹ Most properties only have a small number of units in REAP, and, in neighborhoods facing waves of speculative investment, REAP only marginally shifts the landlords' math. Following similar logic, REAP is more likely to be effective against small property owners than large ones, raising equity concerns. For landlords looking to flip a building or to replace longtime tenants with new, higher-paying ones, the incentive to repair the unit will be outweighed by the incentive to pressure a tenant to leave.⁷²

In contrast to SCEP, which relieves tenants of some of the burden of reporting housing problems, REAP relies on tenant engagement. Tenants must opt-in to participation in REAP, and only about 1 in 4 eligible units do, despite the department's enlisting of community partners to conduct supplementary outreach for the program.⁷³ Myriad explanations can be found for the low enrollment — a lack of understanding of the program, administrative challenges, a fear of retaliation, or a perceived positive relationship with the landlord, and more. Such low participation rates significantly dampen the program's effectiveness as a deterrent. Additionally, advocates with Strategic Actions for a Just Economy (SAJE) note that "tenant involvement throughout the process is critical" to ensure accurate documentation of violations and tracking of unresolved issues.⁷⁴ The program's primary focus on units rather than properties also reduces the likelihood that tenants use the program to organize collectively.

Lastly, while all funds deposited in a tenant's REAP account are theoretically available to cover the cost of repairs, this happens relatively infrequently, and advocates report that accessing funds can be an arduous process. Approximately \$900,000 in rent payments are held in escrow through the program in a typical year; in 2025 about \$100,000 was accessed for in-unit repairs, with an additional \$260,000 accessed directly by the department to prevent utility shutoffs. Funds accessed by tenants or landlords are subject to more intensive oversight — requiring a hearing for approval — than funds accessed by the department to pay utility bills.⁷⁵

Concrete Benefits

REAP's impact for tenants is practical, says Iris Craige, Assistant Director of Policy and Research at SAJE. In addition to incentivizing landlords to make repairs, rent reductions give tenants more money back in their pocket: "while conditions remain unresolved, tenants have additional money available for necessities like groceries, transportation, childcare, and other household expenses." Particularly for low-income tenants who are often rent-burdened, securing significant rent reductions supports them to remain stably housed without sacrificing on essentials.⁷⁶ REAP's rent freeze component also supports stability for tenants after repairs are made. The program provides breathing room, and is a method for directly realizing the warranty of habitability.

For the City, REAP supports enforcement and debt collection across agencies. To be eligible for removal, an owner must first demonstrate the correction of all active orders from LAHD and from all other City or County enforcement agencies. Next, they must pay any outstanding water/electric charges owed to the Los Angeles Department of Water and Power (LADWP), at which point the property can be removed from REAP. After removal, escrow funds are distributed first to pay any un-collected fees (administrative, registration, inspections, pre-paid monitoring, etc.). Any funds remaining in the account are issued to the landlord – or a bill is issued for the remaining balance.⁷⁷

LEVERAGING DIVERSE EXPERTISE AND SKILLSETS: LOS ANGELES COUNTY

Separately from the City of Los Angeles, LA County recently commenced a proactive inspection program covering residential properties in unincorporated areas, with the first proactive inspections in 2024. The Rental Housing Habitability Program (RHHP) inspects all rental units once every 4 years and is modeled largely on SCEP (including a Rent Escrow Account Program) to ensure a relatively standard experience for tenants and landlords throughout the County.

One notable difference between the two programs is that, while SCEP is operated by the City's Housing Department, RHHP is run by the Los Angeles County Department of Public Health (LACDPH).⁷⁸ According to Charlene Contreras, Director of the LACDPH's Community Protection Branch, who developed the program following the passage of the ordinance to create it and now oversees it, this comes with various benefits, notably the integration of community health workers alongside the typical team of inspectors and office staff. "These community health workers have a different skill set to engage with tenants [and landlords] to provide resources. Hoarders, elderly people who need assistance, or people who have mental health challenges – health workers try and dive deep to help," says Contreras.⁷⁹ Working together, RHHP inspectors and community health workers can better partner with landlords and tenants to get to the root of housing problems and mediate concerns and complications as they arise. In the first 18 months of operation, the program has been able to enter 90% of units for inspections, with an 85% compliance rate upon the first re-inspection (21 days following the initial inspection).⁸⁰

{ ENFORCEMENT THEORY:
PARTNERSHIP }

{ ENFORCEMENT MECHANISM(S):
ADMINISTRATIVE OR CIVIL }

{ INSPECTION TRIGGER:
PROACTIVE OR REACTIVE }

LACDPH's experience leading LA County's RHHP system of proactive inspections shows the value of integrating diverse expertise into code enforcement teams. Deploying community health workers alongside inspectors brings a broader set of skills to bear on the complex problems and relationships involved in code enforcement, contributing to an 85% compliance rate upon first reinspection. LACDPH's cross-functional teams conduct inspections, but move those further toward a partnership theory of enforcement, emphasizing a cooperative approach that values resource-sharing and mediation. Such teams could be leveraged in a proactive or reactive inspection system, and they could inform administrative or civil enforcement mechanisms.



Photos from a 2024 rally calling on LA County to establish RHHP, organized by SAJE and allies. Source: [SAJE](#)

CENTERING COMMUNITY KNOWLEDGE AND CONNECTIONS: SAN FRANCISCO CODE ENFORCEMENT OUTREACH PROGRAM

San Francisco has a substantial code enforcement framework, with administrative enforcement tools such as rent abatement procedures, Director's Hearings, assessment fees, and a clear pipeline for referrals to the City Attorney for litigation; in combination, these support structured and consistent enforcement outcomes.⁸¹ One of the greatest strengths of the City's process, however, lies outside the Department. Created by the San Francisco Building Inspection Commission in 1996, the Code Enforcement Outreach Program (CEOP) is a partnership between DBI and four community partners: Housing Rights Committee of San Francisco, Chinatown Community Development Center, and Tenderloin Housing Clinic, which combine to cover tenants in every neighborhood of the city, and the San Francisco Apartment Association (SFAA), which represents the city's landlords. The three tenant groups all organize renters and advocate on housing issues; SFAA likewise advocates for the interests of landlords at the local and state level.

The core concept of CEOP is that, before DBI gets involved, many habitability concerns can be resolved through education, enhanced communication, and mediation – and that this is best done by groups with roots in each community. Each partner organization conducts proactive outreach, visiting schools, community centers, houses of worship, and more, where they deliver presentations on tenants' rights and available resources. Through hotlines, drop-in services, and direct referrals, each fields incoming requests for information and support. For members, SFAA also provides mentorship on how to properly and promptly abate violations. In some cases, tenants may simply need assistance drafting a formal notice to their landlord of a violation and landlords just need to be made aware of their obligation by a trusted party. In others, CEOP staff help to bridge communication gaps and mediate tensions.⁸²

Unsurprisingly, the CEOP community partners regularly find themselves at opposite ends of political debates – but according to program participants CEOP has, over its 30 year history, remained a genuine partnership in which each organization's participation strengthens that of the others. With a long history and ongoing connection to ground-level housing organizing, staff from the tenant groups operate on a bedrock of trust that allows them to mediate between landlords and tenants in difficult situations. And a shared interest in maintaining high quality housing, educating non-professional landlords on their responsibilities, and rooting out bad actors – who undermine the reputation of other landlords – holds the groups together. Tommi Avicoli Mecca, formerly the Counseling Director at Housing Rights Committee of San Francisco for over a decade, describes the important role of the SFAA:

{ ENFORCEMENT THEORY:
PARTNERSHIP }

{ ENFORCEMENT MECHANISM(S):
ADMINISTRATIVE OR CIVIL }

{ INSPECTION TRIGGER:
PROACTIVE OR REACTIVE }

For 30 years, San Francisco has operated a community partnership program with landlord and tenant groups. This longstanding partnership allows a meaningful share of housing problems – approximately 11% of all complaints – to be addressed before reaching the department. DBI reports that the program also helps surface problems it might not otherwise learn about, letting the department direct its enforcement resources toward the buildings and cases that need them most – particularly in lower-income and non-English-speaking communities, where housing problems are most likely to go unreported in the first place. When considered within the frameworks described in the background section above, CEOP falls under a partnership theory, but is used to inform strategic code enforcement efforts by helping discern which cases require agency action. A program like CEOP could operate in conjunction with an administrative or civil mechanism. CEOP is primarily a reactive program that fields complaints of housing problems.

*"Our goal is to get the repairs done – as soon as possible ... If we have a case where a landlord is being difficult, we can call SFAA to partner with us to contact the landlord, put pressure on the landlord and remind them legally of what they're supposed to do. We find that this outreach from a peer group is pretty effective, that having it come from them rather than us can be a really useful tool."*⁸³

From the perspective of leaders at the department, CEOP makes their work more efficient. In the first three months of 2026, CEOP organizations opened about 500 new cases, representing approximately 11% of the total complaints DBI received in that period. Of resolved cases, the vast majority – 85% – did not require DBI involvement.⁸⁴ By handling many problems before they reach DBI, CEOP community groups ensure that all avenues are exhausted and that agency staff only have to handle cases that require additional expertise or enforcement teeth. And as DBI Chief Inspector Jamie Sanbonmatsu notes, CEOP acts as a proactive tool, without requiring the department to inspect every rental property in the city: "the community really knows where the problems are." CEOP surfaces the biggest problems, allowing DBI to prioritize severe cases for enforcement.⁸⁵

Through long-term, meaningful partnership between its primary enforcing agency and community groups with a vested interest in housing quality, San Francisco unlocks a more efficient and empowering system, attuned to needs on the ground. More than just improved efficiency, the program has been transformative, empowering tenants, and allowing the City to reach communities it might not otherwise. In the words of Patrick Hannan, a spokesperson for the agency, "the program has opened doors, literally. It has empowered monolingual and economically vulnerable populations to report housing issues to the City and enabled us to build relationships so we can access these buildings and enforce the Housing Code."⁸⁶ Avicoli Mecca also describes how the program has raised awareness within DBI of the issues tenants face: "For some of the inspectors it's a real education, witnessing the reluctance of the landlord to do the repair. How much the tenant has to go through, how much DBI has to go through to get this vital service restored...[They start to ask] 'Why is this [landlord] doing this?' The human factor has to play in there somehow."⁸⁷ And for tenants, the experience of working with a housing rights counselor through CEOP – or of serving as a volunteer counselor with one of the hotlines operated by CEOP groups – can be a powerful education on their rights. That education pays dividends for tenants, who are better able to advocate for themselves and secure well-maintained, affordable housing. It also benefits the City, which gains when tenants are equipped to enforce their own rights and maintain stable tenancies.



CEOP partner organizations host a tenants' rights presentation and resource fair at a local school. Source: Jamie Sanbonmatsu



An official from SFDDBI leads a presentation and discussion with SFAA members.

Findings & Recommendations

Our research on code enforcement process and approaches finds a few elements of code enforcement systems that are worth highlighting as best practices:

- I Strategically balancing cooperative and punitive code enforcement
- I Targeted, systematic, proactive inspections
- I Administrative enforcement mechanisms

Strategic code enforcement allows flexibility to determine the optimal solutions to housing maintenance problems. Recognizing that landlords have varying access to information and resources, a strategy of pure partnership or punishment risks misallocating resources, failing to support tenants, or unnecessarily driving landlords from the market. Strategic code enforcement strikes a balance between cooperation and punishment-based deterrence by leveraging available data and community knowledge to determine where partnership is possible and punishment is necessary, then providing options for landlords acting in good faith while penalizing bad actors. A one-size-fits-all strategy will not achieve maximum compliance with housing codes – a strategic approach will ultimately generate better outcomes.

Complementing effective complaint-based inspection systems with proactive, systematic inspections – at least for a portion of the housing stock – can improve outcomes. While complaint-based inspections are an important aspect of any code enforcement system, they are not comprehensive. Additionally, they rely on tenants to report problems – which they do not always do for lack of awareness, concern about government involvement, or fear of landlord retaliation. Proactive, systematic inspections address these concerns and they increase awareness of code enforcement systems. Considering the right level of targeting is important, however, and localities can determine this by evaluating data on existing violations, assessing relevant risk factors, prioritizing buildings with a minimum unit count, or other methods.

Where possible, administrative mechanisms should be favored over civil court-based ones. Empowering code enforcement agencies with a range of administrative mechanisms to hold intransigent or predatory landlords accountable allows for swifter action, greater consistency, and lower costs over time. Administrative mechanisms preserve due process for landlords but offer a clear and credible path to escalation, while avoiding the time-consuming, variable, and more expensive court-based route involved in civil enforcement mechanisms. Building this capacity may require investment in agency and tribunal staffing, but the savings in court costs and case continuity make this a worthwhile tradeoff.

With these broader best practices in mind, five key findings emerge from the case studies. Each key finding connects to one or more recommendations for New York City.

Key Finding 1: Administrative enforcement mechanisms facilitate clear and effective consequences.

In Camden, London, the agency charged with overseeing private rental housing is empowered to impose significant penalties and to revoke licenses for landlords with a pattern of harmful behavior through administrative action. Public guidance documentation increases transparency and minimizes discretion.

On the whole, Camden's administrative approach is a more effective alternative to relying on courts to impose consequences. The borough's public documents detailing guidance for applying penalties foster clarity for all parties involved, and its application of meaningful consequences – including high penalties and the threat of de-licensing – acts as a powerful deterrent. Through establishing clearly specified aggravating and mitigating factors, Camden creates guardrails for discretion in the application of penalties, preventing bias and ensuring penalty decisions are consistent across similar cases. The administrative approach also facilitates an effective working partnership with the finance agency that results in high penalty collection rates. Beyond penalty amounts, Camden's licensing system offers New York a tool against the most persistent violators: the ability to revoke a landlord's authority to operate. The closest parallel in New York City is the lengthy foreclosure process or the 7A program, both of which only operate at the building-level. Camden's administrative enforcement mechanism provides a blueprint for New York City, which already has some of the necessary infrastructure. HPD is unique among city agencies in the need to seek penalties through civil court – most agencies already have authority to levy penalties through the City's Office of Administrative Trials and Hearings – and so a structure is in place to build from.

- Recommendation 1:** Create an administrative path for HPD to enforce penalties and consequences for housing maintenance code violations.⁸⁸
- Recommendation 2:** Publish clear guidance describing circumstances under which penalties should be increased or decreased.
- Recommendation 3:** Explore increasing penalties, particularly for immediately hazardous violations, to improve their effectiveness as a deterrent.
- Recommendation 4:** Require landlord licenses, to increase the enforcement tools available to HPD.

Key Finding 2: Targeted, systematic, proactive inspections are an important complement to complaint-based systems.

Both Los Angeles and Seattle operate systematic inspections of all rental housing. These programs increase the local government's reach and ability to uphold housing standards, relieve tenants of the burden of reporting problems, and have the potential to foster better partnerships between the enforcing agencies and landlords as well as tenants. To effectively use government resources, targeting is important – while comprehensive coverage is desirable, San Francisco's case shows that leveraging community input and building data will make efforts more efficient.

In New York City, there is a need to make inspections more proactive, and a new initiative presents a chance to build a strong foundation for targeted, systematic inspections. The "Fix the City" targeted enforcement initiative, announced in the Mayor's Housing Plan, will focus on 10 specific portfolios with longstanding, egregious violations and intends to incorporate building-wide inspections, similar to those utilized in systematic inspection programs elsewhere. With plans for intentional collaboration with Partners in Preservation organizations, the initiative also offers an opportunity to draw on the kind of community input that informs engagement and enforcement efforts so effectively in San Francisco.⁸⁹ DOB's new proactive inspection program also presents an opportunity for learning and partnership.

As the initiative unfolds, the City should treat it as a pilot for a permanent, citywide program rather than another ad hoc effort. A permanent version could focus initially on buildings on, or recently on, existing HPD enforcement program lists and watchlists, then extend inspections to buildings with the same landlords as those buildings, and increase coverage from there. Such an effort could learn from Los Angeles's more frequent inspections of "Tier 2" properties and its close monitoring of properties exiting REAP, both of which target proactive attention toward buildings with a documented history of problems. In the past, New York City has launched and later deprioritized proactive and cyclical inspection efforts; to ensure that a new initiative endures, legislation will be needed to establish it as a permanent program.

Recommendation 5: Develop a new, permanent model for targeted, cyclical, proactive inspections, drawing on Seattle and Los Angeles' systematic inspection programs, the community-centered design used in San Francisco, and initial lessons from "Fix the City" and other targeted enforcement initiatives.

Key Finding 3: Agencies can design programs that help tenants benefit from the theoretical potential of the warranty of habitability.

When landlords fail to make repairs, Los Angeles provides an administrative pathway for tenants to divert rent to escrow accounts and to award tenants a rent reduction and rent freeze. Administrative rent escrow and rent reduction programs can be a powerful consequence for negligent landlords and provide concrete benefits to tenants forced to endure poor conditions, helping to make the warranty of habitability real.

LA's REAP program offers a way to ensure tenants receive appropriate rent reductions when they are not getting what they pay for. With a multi-pronged set of consequences – escrow accounts, rent abatements, and a rent freeze – REAP is designed to directly affect negligent landlords' profits. New York already has a civil legal mechanism aimed at a similar goal, though it operates quite differently from REAP. State law requires the City to publish a list of "rent impairing" violations – "fire hazard[s] or a serious threat[s] to life, health or safety," which if left unaddressed for 6 months or longer, can be a defense against nonpayment evictions and can lead to a potential abatement of past rent.⁹⁰ Unlike REAP, however, the scope of this law is too narrowly focused on the most severe violations and the procedural requirements are too high: too many New York City tenants are left paying full rent for substandard conditions, with complicated requirements, risks, and paperwork needed to assert this defense. Further, rent impairing violations are a defense, not an assertive technique to actualize the warranty of habitability, and they do not provide tenants with financial relief until after a case is resolved in their favor.

REAP points toward an alternative model: rather than waiting for tenants to invoke a defense after the fact, the City could proactively place qualifying units into escrow and secure rent reductions as violations are identified. Mayor Mamdani has already announced an intent to revisit the City's list of rent impairing violations, which opens a window to think expansively about methods for proactively facilitating rent escrow and securing rent abatements for tenants living with habitability violations, rather than confining reform to the existing model.⁹¹ That said, the REAP framework can be improved upon, and any such program should be designed with tenant participation in mind from the outset. Opt-in enrollment has limited REAP's reach, with only about one in four eligible units participating despite dedicated outreach efforts. The framework nonetheless offers a model for consideration and adaptation, particularly if New York can improve on REAP's participation rate by building automatic or default enrollment into the program's design.

Recommendation 6: Study administrative rent escrow and rent abatement programs in Los Angeles and other municipalities to inform programmatic reform in New York City.

Key Finding 4: Interdisciplinary inspection teams can generate strong enforcement outcomes.

LACDPH's experience leading LA County's RHHP system of proactive inspections shows the value of integrating diverse expertise into code enforcement teams. Deploying community health workers alongside inspectors brings a broader set of skills to bear on the complex problems and relationships involved in code enforcement, contributing to an 85% compliance rate upon first reinspection. In New York City, these skillsets may be found within different offices at HPD and in other partner agencies. Interagency coordination presents logistical challenges, but we should also recognize the opportunities it presents, as New York City's robust agency infrastructure is an asset to be leveraged – again, the Mayor's "Fix the City" initiative is a place to experiment.

Recommendation 7: Continue to improve interagency coordination and consider creating permanent cross-agency inspection teams.

Key Finding 5: Partnerships between agencies and community organizations can alleviate the burden on agencies and lead to better targeting of resources.

For 30 years, San Francisco has operated a community partnership program with landlord and tenant groups. This longstanding partnership allows a meaningful share of housing problems – approximately 11% of all complaints – to be addressed before reaching the department. DBI reports that the program also helps surface problems it might not otherwise learn about, letting the department direct its enforcement resources toward the buildings and cases that need them most – particularly in lower-income and non-English-speaking communities, where housing problems are most likely to go unreported in the first place.

Recommendation 8: Partner with organized tenants to inform enforcement strategies

Recommendation 9: Expand funding for Partners in Preservation and related programs

Recommendation 10: Explore a system of information, referrals, and counseling that establishes a direct link between community partners and HPD

CONCLUSION

New York City is not alone in facing habitability challenges – and it is not alone in developing innovative solutions to tackle these challenges. As New York City considers major improvements to its code enforcement system, these lessons from other local governments can be instructive. The Mamdani administration’s early plans recognize the important role of the code enforcement system as a tool for preserving existing housing, and they show promise for making reforms to the code enforcement system. These initial reforms emerge from the tenant movement’s organizing to build power and highlight the urgency of this moment, which demands that promise be realized: as violations rise, fires spike, and federal repression intensifies, tenants cannot afford another round of half-measures.

To truly transform the system so that it supports tenants to challenge the most persistent and predatory forms of neglect – particularly households in the Bronx, Upper Manhattan, and Central Brooklyn who have long faced the highest violation rates – the City must go further than current plans. In the past, ad hoc reform efforts have been launched to great fanfare and later deprioritized, and it is imperative that we use the current ad hoc efforts to develop permanent programs to ensure these reforms outlive the moment. Alongside permanent programs, we must continue to advocate for adequate resources, transparency, and alignment with partners in government to ensure these programs evolve to meet the challenges we face.

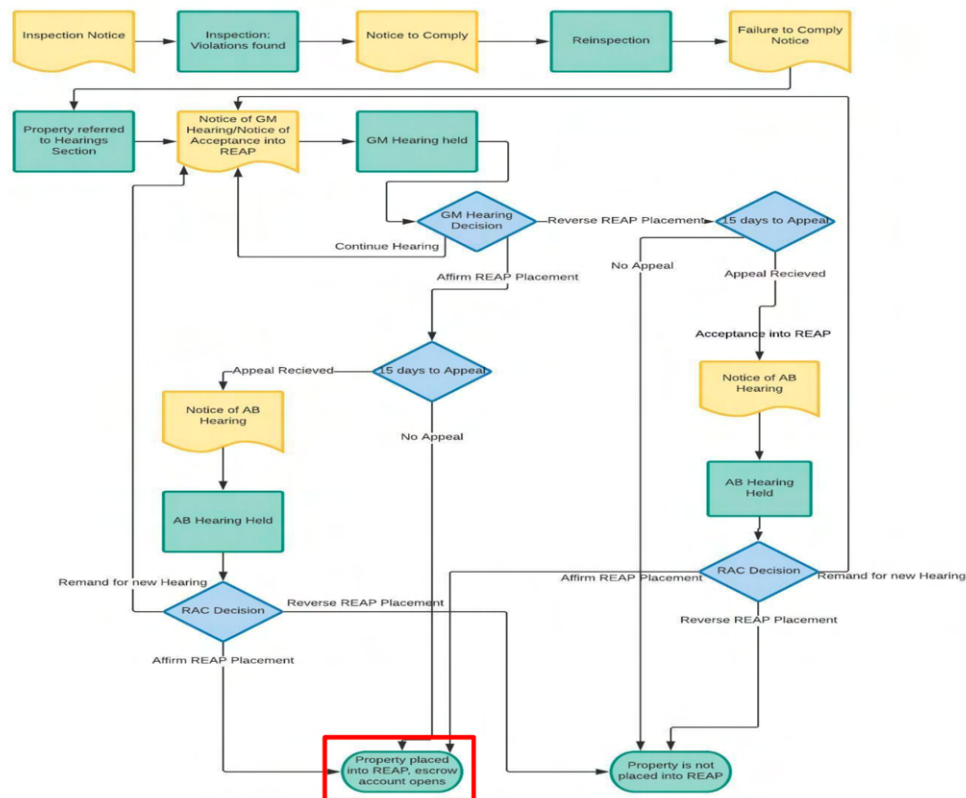
Fifty years of experience have made one thing clear: without a strong enforcement system behind it, the warranty of habitability remains little more than a promise on paper. Rebuilding trust with tenants through commitment and action – eroded over decades of neglect, under-enforced violations, and uncollected penalties – is as critical to successfully making that promise real as any program or policy. No reform or new system will matter if tenants do not believe the system will work for them. The Key Findings and Recommendations presented above offer a path forward. By learning from other approaches, all of which were initially won by organized tenants, we can improve New York City’s code enforcement system and make it more effective at preserving existing housing. We can make a system that is clearer, fairer, and more efficient for landlords who operate in good faith and respect their legal duties and more supportive, stabilizing, and empowering for tenants.

Appendices

Appendix A: Comparison table of Case Study localities

Locality	Population	Population Density (mi ²)	% Renter	Median age of housing stock
Camden, London ⁹²	219,900	26,000 per mi ²	69% (includes ~33% in social housing)	~1920
Los Angeles (City) ⁹³	3,878,700	8,220 per mi ²	60%	1965
Los Angeles (County) ⁹⁴	10,400,000	2,550 per mi ²	50.5%	~1960-1969
New York ⁹⁵	8,546,000	28,480 per mi ²	64%	1931
San Francisco ⁹⁶	812,500	17,400 per mi ²	66%	1948
Seattle ⁹⁷	816,600	9,675 per mi ²	50%+	~1980-1989

Appendix B: Flowchart of REAP Referral and Acceptance Process



Endnotes

- 1 Success rates are only modestly improved by legal representation, indicating the limitations of a court-based system. See: <https://www.law.nyu.edu/sites/default/files/The%20Limits%20of%20Good%20Law-%20A%20Study%20of%20Housing%20Court%20Outcomes.pdf>; <https://scholarship.law.georgetown.edu/cgi/viewcontent.cgi?article=1887&context=facpub>
- 2 ANHD Analysis of HPD Open Data on Housing Maintenance Code Violations and 311 Complaints: https://data.cityofnewyork.us/Social-Services/311-Service-Requests-from-2020-to-Present/erm2-nwe9/about_data; https://data.cityofnewyork.us/Housing-Development/Housing-Maintenance-Code-Violations/vwx5-dwi5/about_data; <http://risk.anhd.org>
- 3 <https://anhd.org/report/inequitable-enforcement-crisis-housing-code-enforcement-new-york-city/>
- 4 ANHD analysis of HPD Audits of Self-Certification (2019-2025). <https://nysfocus.com/2026/06/22/nyc-hpd-housing-violations-unresolved-complaints>; <https://yalelawjournal.org/forum/who-pays>
- 5 <https://www.furmancenter.org/soc-report/state-of-the-city-2025/state-of-renters-and-their-homes-2025/>; <https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf>; Fires in the Bronx have doubled in the past two years. See: Testimony of Dina Levy, Commissioner of the New York City Department of Housing Preservation and Development, City Council Hearing on the Executive Budget, June 2, 2026; <https://gothamist.com/news/the-bronx-is-burning-again-major-fires-in-the-borough-have-doubled>
- 6 <https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023%20NYCHVS%20Selected%20Initial%20Findings.pdf>
- 7 <https://anhd.org/report/dont-take-us-back-examining-history-and-ownership-in-rent-stabilized-housing/>
- 8 Desmond, M. (2017). Evicted. Penguin Books; <https://www.law.nyu.edu/sites/default/files/The%20Limits%20of%20Good%20Law-%20A%20Study%20of%20Housing%20Court%20Outcomes.pdf>
- 9 <https://www.furmancenter.org/publication/cracking-code-enforcement-how-cities-approach-housing-standards/>; <https://communityprogress.org/re-sources/strategic-code-enforcement/>
- 10 <https://scholarship.law.georgetown.edu/cgi/viewcontent.cgi?article=1887&context=facpub>
- 11 <https://communityprogress.org/resources/strategic-code-enforcement/>; <http://scholarshare.temple.edu/items/0a676cb3-4621-4c23-b9e0-646b79aeebfa>; <https://www.furmancenter.org/publication/cracking-code-enforcement-how-cities-approach-housing-standards/>
- 12 <https://www.changelabsolutions.org/product/healthy-housing-through-proactive-rental-inspection>
- 13 <https://anhd.org/report/inequitable-enforcement-crisis-housing-code-enforcement-new-york-city/>
- 14 Interviews with Aurora Blackstone, Maureen Roat, and Geoff Tallent, Seattle Department of Construction and Inspections (SDCI), May 4 and May 13, 2026; Interview with Darren Wilsher, Grace House, and Jack Kane, Camden Private Sector Housing Service; May 12, 2026.
- 15 <https://www.changelabsolutions.org/product/healthy-housing-through-proactive-rental-inspection>
- 16 Interviews with Aurora Blackstone, Maureen Roat, and Geoff Tallent, Seattle Department of Construction and Inspections (SDCI), May 4 and May 13, 2026
- 17 <https://www.changelabsolutions.org/product/healthy-housing-through-proactive-rental-inspection>
- 18 Even when tenants report a problem to the relevant enforcing agency, it may be a long time after the problem first develops.
- 19 <https://www.changelabsolutions.org/product/healthy-housing-through-proactive-rental-inspection>; <https://www.furmancenter.org/publication/cracking-code-enforcement-how-cities-approach-housing-standards/>
- 20 Interview with Joel Stillman and Maxwell Austensen, JustFix, May 11, 2026; Interview with Rose Lenehan, Los Angeles Tenants Union, May 11, 2026. Note: Lenehan observes that, at baseline this type of coordination can be improved with better notice of inspections and the related rights: "I think if the Housing Department had a clearer form to send to tenants notifying them of the inspection and telling them of their rights, that would help too, as it is many tenants have trouble interpreting the notice of upcoming inspection that they get and understanding what they can do in response."
- 21 Interviews with Aurora Blackmore, Maureen Roat, and Geoff Tallent, Seattle Department of Construction and Inspections (SDCI), May 4 and May 13, 2026; Interview with Charlene Contreras, Los Angeles County Department of Public Health, May 5, 2026.
- 22 <https://www.changelabsolutions.org/product/healthy-housing-through-proactive-rental-inspection>; <https://communityprogress.org/blog/proactive-rental-inspection-programs/>
- 23 <http://localhousingsolutions.org/housing-policy-library/code-enforcement/> (And among those that focus on habitability standards, different areas may have different frameworks: operating with lenses from public health or legal protections).
- 24 <https://www.furmancenter.org/publication/cracking-code-enforcement-how-cities-approach-housing-standards/>
- 25 https://www.nyc.gov/assets/hpd/downloads/pdfs/services/bgc_winner.pdf
- 26 See, e.g.: <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCAadmin/0-0-0-60027> (chapter two of title 27 of the administrative code of the city of New York); <https://www.nyc.gov/site/buildings/safety/dob-violations.page>; <https://www.nyc.gov/site/fdny/business/violations/violations.page>; <https://www.nyc.gov/site/dep/index.page>; <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCAadmin/0-0-0-210593>; <https://www.nyc.gov/site/doh/health/health-topics/rat-inspections.page>
- 27 In rare instances, the City has also pursued criminal action against landlords. See, e.g. <http://manhattanda.org/d-a-bragg-d-o-i-commissioner-strauber-announce-indictment-of-daniel-ohebshalom-for-harassing-rent-regulated-tenants/>
- 28 ANHD analysis of HPD Audits of Self-Certification (2019-2025)
- 29 Certain HPD fees and charges imposed by HPD do convert into tax liens if unpaid. These include charges from repairs conducted through ERP, fees for third and subsequent re-inspections where each has resulted in the issuance of a hazardous or immediately hazardous violations, and fees for inspections conducted through AEP.
- 30 <https://www.nyc.gov/site/finance/property/property-in-rem-forclosure.page>
- 31 <https://council.nyc.gov/press/2011/08/09/859/>
- 32 <https://www.nyc.gov/site/hpd/services-and-information/partners-in-preservation.page>
- 33 <http://nyc.gov/site/hpd/services-and-information/inspections.page>; <https://www.nyc.gov/assets/hra/downloads/pdf/cityheps-documents/DSS-10k.pdf>

- 34 <https://www.nyc.gov/site/hpd/services-and-information/alternative-enforcement-program-aep.page>; <https://www.nyc.gov/site/hpd/services-and-information/certification-of-no-harassment-conh.page>
- 35 https://www.nyc.gov/assets/buildings/pdf/testimony_032426_pb_hearing.pdf
- 36 <https://council.nyc.gov/press/2008/12/01/1258/>; https://www.nyc.gov/html/records/pdf/govpub/2748bushwick_initiative.pdf
- 37 <https://www.furmancenter.org/directory/j-51-tax-incentive/>; <https://www.nyc.gov/site/hpd/services-and-information/tax-incentives-j-51-reform.page>
- 38 <https://www.nyc.gov/assets/hpd/downloads/pdfs/services/property-owner-landlord-resources.pdf>
- 39 <https://www.nyc.gov/site/hpd/services-and-information/unlocking-doors.page>
- 40 <https://nchh.org/tools-and-data/data/state-of-healthy-housing/rankings/location/new-york-ny/?data-year=2018>; NCHH rankings use American Housing Survey data includes surveys from the 20 largest metro areas and a sample of other metro areas.
- 41 ANHD data analysis (2026); risk.anhd.org; <https://anhd.org/report/inequitable-enforcement-crisis-housing-code-enforcement-new-york-city/>
- 42 <https://archive.nyu.edu/handle/2451/75568>; ANHD Analysis of HPD Reports on AEP.
- 43 https://assets.publishing.service.gov.uk/media/69eb70f020a498c16734af5f/DRAFT_HHSRS_Operating_Guidance_Part_1.pdf; <https://www.legislation.gov.uk/ukpga/2004/34/contents>; <https://privaterenters.camden.gov.uk/renters-rights-bill>
- 44 Interview with Darren Wilsher, Grace House, and Jack Kane, Camden Private Sector Housing Service; May 12, 2026. Note: London's Boroughs are municipal governments connected through a larger London Metropolitan government that focuses on shared governance issues including transportation. Boroughs are responsible for most other local government functions and are similar to a New York City Community District in population and size.
- 45 Specifically, Improvement Notices are issued when there is at least one Category 1 and/or Category 2 hazards present, roughly corresponding to HPD Class C and Class B violations, respectively.
- 46 Interview with Darren Wilsher, Grace House, and Jack Kane, Camden Private Sector Housing Service; May 12, 2026.
- 47 Email correspondence with Darren Wilsher, Camden Private Sector Housing Service, June 2026.
- 48 Interview with Darren Wilsher, Grace House, and Jack Kane, Camden Private Sector Housing Service; May 12, 2026.
- 49 All rental housing with 5+ units must be registered in the UK, and Camden operates an optional "additional licensing" program that requires "any property occupied by 3 or more people forming 2 or more households" to be licensed. The Camden Council has considered adopting "selective licensing", which would require two-family homes where at least one home is rented to seek a license as well. Though not strictly required under UK law, Camden inspects most properties before granting an HMO (Houses in Multiple Occupation) license, which provides another point to ensure housing quality. See: <https://www.camden.gov.uk/houses-multiple-occupation>; <https://fitzrovia.com/2025/01/17/a-significant-number-of-hmos-in-camden-are-operating-without-a-licence/>; <https://www.gov.uk/government/publications/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities>; <https://hmokit.co.uk/hmo-standards/camden>
- 50 <https://privaterenters.camden.gov.uk/news/-/blogs/camden-secures-four-rogue-landlord-banning-orders>
- 51 <https://www.camden.gov.uk/documents/d/guest/private-sector-housing-enforcement-policy-5>
- 52 Interview with Darren Wilsher, Grace House, and Jack Kane, Camden Private Sector Housing Service; May 12, 2026. Fines collected by the PSHS "can be used to reinvest in further housing enforcement resources within the council [or] they must be returned to central government."
- 53 In Fiscal Year 2025, HPD collected ~\$60,000 in penalties for false certifications; ANHD analysis of HPD Audits of Self-Certification (2019-2025); <https://yalelawjournal.org/forum/who-pays>
- 54 <https://www.changelabsolutions.org/product/healthy-housing-through-proactive-rental-inspection> Recently, both Chicago and Philadelphia took steps toward launching pilots of proactive inspection programs. See: https://www.chicago.gov/city/en/depts/mayor/press_room/press_releases/2026/march/various-measures-march.html; <https://why.org/articles/philadelphia-proactive-rental-inspections/>
- 55 <https://housing.lacity.gov/rccb-newsletter-1-scep>; <https://www.seattle.gov/documents/Departments/SDCI/Codes/RRIO/RRIOAnnualReport.pdf>; Interview with Hatim Fatehi and Ariel Moreno, Los Angeles Housing Department (LAHD), May 27, 2026; Interview with Aurora Blackmore and Maureen Roat, Seattle Department of Construction and Inspections (SDCI), May 4, 2026. Note: both cities also offer landlords the option to hire a certified private inspector; this is a key component that avoids constitutional challenges. These inspection results are subject to audit.
- 56 The program is currently operating on a longer timescale as it clears a backlog related to staffing challenges incited by the COVID-19 pandemic. See: https://cityclerk.lacity.org/onlinedocs/2025/25-0812_rpt_LAHD_07-23-25.pdf
- 57 Interview with Hatim Fatehi and Ariel Moreno, Los Angeles Housing Department (LAHD), May 27, 2026.
- 58 <https://www.saje.net/reform-to-strengthen-code-enforcement/>; Interview with Hatim Fatehi and Ariel Moreno, Los Angeles Housing Department (LAHD), May 27, 2026; Interview with Liseth Romero-Martinez and Joe Babujan, Los Angeles Housing Department (LAHD), June 3, 2026. Note: LAHD and advocates both have additional priorities for strengthening SCEP beyond these reforms.
- 59 Properties must be inspected at least once every 5-10 years. Each year 10% of properties previously inspected more than 5 years ago are selected at random for inspection. See: <https://www.seattle.gov/documents/Departments/SDCI/Codes/RRIO/RRIOAnnualReport.pdf> and https://library.municode.com/wa/seattle/codes/municipal_code?nodeId=TIT22BUCOCO_SUBTITLE_IIHOCO_CH22.214RERINOR_22.214.050INCECORE
- 60 Interview with Aurora Blackmore and Maureen Roat, Seattle Department of Construction and Inspections (SDCI), May 4, 2026; Interview with Hatim Fatehi and Ariel Moreno, Los Angeles Housing Department (LAHD), May 27, 2026. See also: <https://www.seattle.gov/documents/Departments/SDCI/Codes/RRIO/RRIOChecklist.pdf>
- 61 According to Geoff Tallent, Division Director at Seattle Department of Construction and Inspections, (who helped launch the RRIO program), this allows for a beneficial feedback loop that has improved RRIO inspections: "We ask inspectors periodically, 'What are you walking past that you actually think you shouldn't be?'" Inspectors bring their knowledge and familiarity from problems encountered in more comprehensive complaint-based inspections into the RRIO program (Interview with Geoff Tallent, Seattle Department of Construction and Inspections (SDCI), May 13, 2026); Boston has seen similar benefits from its proactive inspections program. See: <https://www.changelabsolutions.org/product/healthy-housing-through-proactive-rental-inspection>
- 62 <https://buildingconnections.seattle.gov/2023/12/27/2024-fee-changes/>; <https://members.aagla.org/news/los-angeles-systematic-code-enforcement-program-scep-fee-increase-update>; Interview with Hatim Fatehi and Ariel Moreno, Los Angeles Housing Department (LAHD), May 27, 2026. Note: Los Angeles is currently discussing a fee increase to stabilize staffing, develop an emergency relocation fund, and tackle other department priorities.
- 63 This is one reason San Francisco has not developed a systematic proactive inspection program of all rental properties. Interview with Jamie Sanbonmatsu, San Francisco Department of Building Inspection (DBI), May 27, 2026.
- 64 Interview with Rose Lenehan, Los Angeles Tenants Union (LATU), May 11, 2026. Particularly with the REAP program, the City of Los Angeles attempts to address this through community partnerships.
- 65 Interview with Geoff Tallent, Seattle Department of Construction and Inspections (SDCI), May 13, 2026.

- 66 Interview with Rose Lenehan, Los Angeles Tenants Union (LATU), May 11, 2026.
- 67 Interview with Liseth Romero-Martinez and Joe Babujyan, Los Angeles Housing Department (LAHD), June 3, 2026; <https://housing.lacity.gov/wp-content/uploads/2025/09/REAP-Program-Brochure-English-9-18-25.pdf>; Note: The reduced rent continues for 30 days after a unit is removed.
- 68 <https://scag.ca.gov/sites/default/files/old/file-attachments/los-angeles-he-0421.pdf>; In 2025, 960 units left REAP and 1,725 were placed into the program (LAHD).
- 69 <https://housing.lacity.gov/wp-content/uploads/2025/09/REAP-Program-Brochure-English-9-18-25.pdf>. See Appendix B for a flowchart overview of the process.
- 70 Interview with Liseth Romero-Martinez and Joe Babujyan, Los Angeles Housing Department (LAHD), June 3, 2026.
- 71 <http://la.myneighborhooddata.org/2022/12/rent-stabilization-ordinance-rso-units/>; <https://caanet.org/topics/costa-hawkins-act/>
- 72 Interview with Liseth Romero-Martinez and Joe Babujyan, Los Angeles Housing Department (LAHD), June 3, 2026. LAHD staff explained that the primary tool for enhanced enforcement is referring cases to the City Attorney for prosecution. In recent years, they have made more of these referrals.
- 73 Interview with Liseth Romero-Martinez and Joe Babujyan, Los Angeles Housing Department (LAHD), June 3, 2026. Note: SAJE is a REAP community partner organization.
- 74 Interview with Iris Craig, Strategic Actions for a Just Economy (SAJE), May 26, 2026.
- 75 Interview with Liseth Romero-Martinez and Joe Babujyan, Los Angeles Housing Department (LAHD), June 3, 2026; Interview with Iris Craig, Strategic Actions for a Just Economy (SAJE), May 26, 2026
- 76 Interview with Iris Craig, Strategic Actions for a Just Economy (SAJE), May 26, 2026.
- 77 Interview with Liseth Romero-Martinez and Joe Babujyan, Los Angeles Housing Department (LAHD), June 3, 2026.
- 78 An additional difference between the county program (RHHP) and the city program (SCEP) is that RHHP inspectors are empowered to identify and cite underlying conditions for correction, which is not currently possible in the city of Los Angeles.
- 79 Similar to Los Angeles County, Camden also employs a cross-functional team. Dedicated to identifying unlicensed rental properties and intervening to support tenants, Camden's HMO Enforcement and Licensing team includes inspectors as well as Tenancy Relations Officers – inspectors focus on assessing the hazards present and the Tenancy Relations Officer works to ensure that tenants are aware of their rights and of the support they can receive from the agency and/or community organizations.
- 80 Interview with Charlene Contreras, Los Angeles County Department of Public Health (LACDPH), May 5, 2026.
- 81 <https://www.sf.gov/resource--2023--code-enforcement-key-program-information>; <https://www.sf.gov/departments--department-building-inspection--code-enforcement-dbi>; https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_admin/0-0-0-1093;
- 82 Interview with Tommi Avicoli Mecca, Housing Rights Committee of San Francisco (HRCFSF), May 26, 2026; Interview with Jamie Sanbonmatsu, San Francisco Department of Building Inspection (DBI), May 27, 2026; Email correspondence with Patrick Hannan, San Francisco Department of Building Inspection (DBI), May 2026; see also: <https://www.sf.gov/code-enforcement-outreach-program>
- 83 Interview with Tommi Avicoli Mecca, Housing Rights Committee of San Francisco (HRCFSF), May 26, 2026; Interview with Jamie Sanbonmatsu, San Francisco Department of Building Inspection (DBI), May 27, 2026. Sanbonmatsu also highlighted that this saves the department's enforcement tools – their hammer – to be used only when necessary, minimizing adversarial relationships with property owners/managers.
- 84 CEOP data provided by SF DBI; Housing Complaints data from SF Open Data. In DBI-required reports, CEOP cases are defined as those “with completed intakes, advocacy actions, and/or mediation services.”
- 85 Interview with Jamie Sanbonmatsu, San Francisco Department of Building Inspection (DBI), May 27, 2026.
- 86 Email correspondence with Patrick Hannan, San Francisco Department of Building Inspection (DBI), May 2026.
- 87 Interview with Tommi Avicoli Mecca, Housing Rights Committee of San Francisco (HRCFSF), May 26, 2026.
- 88 This would likely require state authorization.
- 89 <https://www.nyc.gov/content/dam/nycgov/nyc-main/pdf/2026/block-by-block-report.pdf>
- 90 <https://www.nysenate.gov/legislation/laws/MDW/302-A>; <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCrules/0-0-0-57384>
- 91 <https://www.nyc.gov/content/dam/nycgov/nyc-main/pdf/2026/block-by-block-report.pdf>
- 92 <https://jsna.camden.gov.uk/reports/demographics/>; <https://www.britannica.com/place/Camden-borough-London>; <https://www.ons.gov.uk/visualisations/censusareachanges/E09000007/>; <https://resi-analysts.com/wp-content/uploads/LGA/Reports/Camden.pdf>
- 93 <https://www.discoverlosangeles.com/media/facts-about-la>; <https://housing.lacity.gov/residents/renters>; <https://la.myneighborhooddata.org/2024/11/median-year-built/>
- 94 <https://lacounty.gov/residents/>; <https://data.census.gov/table/ACSDP1Y2024.DP04>
- 95 <https://www.nyc.gov/content/planning/pages/planning/population>; <https://worldpopulationreview.com/us-cities/new-york/new-york>; <https://popfactfinder.planning.nyc.gov/>
- 96 <https://worldpopulationreview.com/us-cities/california/san-francisco>; https://census.bayareametro.gov/households?location=san_francisco; <https://data.census.gov/table/ACSDP1Y2024.DP04>; <https://www.sfchronicle.com/realestate/article/san-francisco-old-homes-19964305.php>
- 97 <https://www.seattle.gov/opcd/population-and-demographics>; <https://www.seattle.gov/housing/renters>; <https://data.census.gov/table/ACSDP1Y2024.DP04>



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