



Testimony for the New York City Rental Ripoff Hearings

May, 2026

The Association for Neighborhood and Housing Development (ANHD) thanks Mayor Mamdani and the leadership of HPD, DOB, DCWP, OME, and MOPT for the opportunity to submit testimony on how the City can confront poor conditions and unconscionable business practices in housing.

About the Association for Neighborhood and Housing Development

ANHD is one of New York City's lead policy, advocacy, and technical assistance and capacity-building organizations. We maintain a membership of 80+ neighborhood-based and citywide nonprofit organizations that have affordable housing and/or equitable economic development as a central component of their mission. We are an essential voice, bridging the power and impact of our member groups to build community power and ensure the right to affordable housing and thriving, equitable neighborhoods for all New Yorkers. We value justice, equity, and opportunity, and we believe in the importance of movement building that centers marginalized communities in our work. Across 5 decades and 5 boroughs, we have consistently focused on addressing New York's housing affordability crisis, displacement, and economic inequity to build community power.

ANHD's work directly supports the needs of our members who develop, manage, and organize to preserve affordable housing, and who fight to bring equity into low-wealth communities in New York City—especially communities of color. Our groups rely on us for technical assistance and capacity-building resources that allow them to maximize their resources, skills, and impact. The support services, research, analysis, public education, and coalition building we do help to identify patterns of local neighborhood experiences and uplift citywide priorities and needs. Our work translates into the capacity to win new programs, policies, and systems that ensure the creation and preservation of deeply and permanently affordable housing and economic justice.

For generations, New York City's tenants have organized to preserve their homes and defend their right to live in safe, healthy conditions. Despite remarkable organizing efforts, known bad actors have continued to harass and displace tenants, been responsible for horrific living conditions and threats to public safety, and have not been properly held accountable by city government. We welcome these Rental Ripoff Hearings and the opportunity they provide for tenants to give voice to their struggles, and we are encouraged by this administration's stated commitment to prioritizing safety, affordability, and dignity for tenants. We offer the following testimony in that spirit.



When tenants are dealing with negligent landlords, they organize with their neighbors and look to the City for support. Yet when they do, they must still confront multifaceted barriers to actually get violations issued and corrected. Scheduling inspections can be challenging, tenants must often take entire days off to be at home for the scheduled inspection, and sometimes inspectors don't show up. When an inspector visits a tenant's home, too often they do not speak the same language — leading to mistakes and misunderstandings that can render the whole inspection invalid. When tenants successfully navigate the complaint process and an inspector correctly identifies a violation, the most difficult battle remains: getting the landlord to make real repairs.

A persistent abuse is the false self-certification of violations and the failure to address underlying issues causing repair problems. Since 2019, HPD has conducted annual audits of self-certifications of the most hazardous Class C violations. In each of the past five years, at least 30% of audited certifications of correction have been found to be falsely certified. When repairs are made, they too often treat only the surface symptom rather than the underlying cause — for example, a property manager may remove mold from a bedroom wall but neglect to repair the leaking pipe behind it, allowing the mold to return.

Landlords are meant to face penalties for forcing tenants to live in these conditions, but enforcement is weak and collection is minimal. In recent memory, the City has routinely forgiven or deferred penalties in favor of negotiated agreements. Looking exclusively at false certifications of Class C violations, the numbers are stark: in 2024, the City collected only \$44,000 in penalties for falsely certified violations — less than \$2 per known false certification. Had the City applied even the lowest applicable penalty of \$500 to each known false certification, it could have raised \$10 million. Instead, it collected roughly half a percent of what it was owed.

Meanwhile, staffing has not kept pace with need. HPD has made meaningful investments to rebuild its inspector workforce since the COVID-era staffing shortages, and that is welcome. Funding for the Housing Litigation Division, however, remains flat, which will directly hinder the administration's stated goal of holding repeat-offending landlords accountable.

We urge the Mayor and the relevant city agencies to take coordinated action in two key areas:

Revamp the City's Code Enforcement System

First, the City should establish a Code Enforcement interagency task force — convened by the Mayor's Office — with empowered representatives from HPD, DOB, FDNY, DEP, and DOH. This body should enhance cross-agency coordination throughout the full code enforcement pipeline, from 311 triage to inspection to litigation, and work toward the streamlined system the Mayor had described in his campaign platform.¹

Second, the City must partner with organizers and tenants to take a geographically-targeted and/or portfolio-based approach to target the worst violators of housing maintenance codes. Neighborhood-based interagency task forces, modeled on the East Brooklyn and North

¹ <https://www.zohranfornyc.com/policies/protecting-new-yorks-tenants>



Brooklyn task forces, should conduct both proactive and complaint-driven building-wide inspections in conjunction with tenants and community organizers. Likewise, the Partners in Preservation model holds promise; the city should continue to support the program and incorporate feedback from partner organizations. At a portfolio level, working with the Signature Tenant Coalition to address conditions in the former Signature portfolio is a prime opportunity for intervention, particularly given the City's financial involvement. Recent administration actions to intervene in the A&E and in the Pinnacle/Summit portfolios indicate a recognition of the importance and value of this approach. In the longer-term, the City should look to expand proactive code enforcement systems, as numerous other cities have done or are currently doing, to intervene promptly and holistically before building conditions deteriorate.

Third, the City must improve language access. Inspectors have ready access to telephone interpretation services that they are supposed to use when they cannot communicate directly with a tenant, so that language barriers do not result in missed or inaccurate violations. Yet problems persist, and the City should work with ANHD members to identify the reasons that language access continues to present challenges for tenants who are seeking to make reports.

Support Tenants and Hold Landlords Accountable

The administration should move aggressively to collect the penalties the City is already owed. As described above, the City does not collect the majority of penalties owed – and does not generally pursue collection at all for many A and B violations. To be sure, there should be nuance and an efficient use of agency staff time and thoughtful consideration of the impact of collection on different types of landlords, but we are far from that being a relevant concern: in Calendar Year 2024, HPD recorded nearly 300,000 Class C violations – over a quarter of these remain open – and yet the department collected only a small fraction of what it would be owed.² And, as referenced above, the City collects under \$2 in penalties per identified false certification. Failing to collect penalties prescribed by law undermines faith in the system at large and contributes to a sense of city government as apathetic, impotent, or oppositional and leaves tenants with the message that working through the existing system is futile and hopeless.

To support transparency and accountability, the City should make penalty collection data publicly available. On a rolling or annual basis, HPD should publish, as an open data CSV file, collection amounts and rates by housing maintenance code violation code and by violation class — giving the public and policymakers information needed to track progress toward improving collection outcomes. A step further would be to publish a comprehensive dataset on penalties for overdue violations, including the violation identification number, key location information, penalty amount, and the status of payment. This information could be appended to the existing NYC OpenData dataset for [Housing Maintenance Code Violations](#). Alternatively, it could exist as a standalone dataset similar to the NYC OpenData datasets for [Open Market Order Charges](#)

² <https://www.nyc.gov/assets/hpd/downloads/pdfs/services/certification-of-corrections-cy24.pdf>; our analysis indicates that at minimum, this figure is in the millions, but more likely in the tens of millions.



and [Handyman Work Order Charges](#) which are linked to charges generated by work done under the Emergency Repair Program, Alternative Enforcement Program, and Demolition program.

The City should expand and improve coordination across its enforcement programs. Organizers working with the Alternative Enforcement Program (AEP) report that, though buildings in the program often make progress initially after placement, too many fall back into disrepair too, cycling in and out of the program. Additionally, organized tenants and community groups are not engaged as partners and communication from HPD to tenants about the building's status in AEP and other programs is often minimal. Improving communication and partnership with tenants, who are the ones with the most at stake, would be complemented by also taking a firmer approach to problem properties, including higher fees and firmer legal enforcement of existing penalties. On the positive side, organizers do report that AEP participation facilitates action from the Emergency Repair Program (ERP). Tenants in non-AEP buildings should not be forced to live in hazardous conditions due to landlord neglect, and the Emergency Repair Program (ERP) should be funded so that repairs are automatically triggered when a Class C violation becomes overdue. Lastly, the Certification of No Harassment (CONH) program has been demonstrated to be an effective tool at identifying buildings where tenants are at-risk of harassment and at improving conditions in buildings that are required to seek a CONH before conducting major construction work.³ The program should be made permanent, strengthened, and better coordinated with other existing programs – including the Anti-Harassment Task Force, which should see increased outreach capacity to proactively identify and interrupt tenant harassment.

Finally, the City must increase staffing in the Housing Litigation Division. According to testimony from HPD Commissioner Levy, the department resolved 22,000 violations through comprehensive litigation – but according to the City's OpenData portal, there are over 87,000 Class C violations from FY25 that remain open, indicating a great deal of need for more enforcement.⁴ More attorneys means more capacity to pursue HP Actions for comprehensive litigation, challenge false certifications, obtain access warrants for emergency repairs, pursue heat and hot water cases, and bring 7A proceedings against the worst actors. The Mayor's proposal to rebuild the Law Department is a welcome signal — but dedicated litigation support for housing enforcement is essential and must be funded accordingly.

The City has the power to ensure accountability. We are asking you to use it and ensure tenants' interests and safety are front and center. We look forward to continued engagement and partnership as the administration finalizes its housing plan. If you have any questions or need additional information, please contact Peter Estes peter.e@anhd.org.

³ HPD Report on the CONH Pilot Program (2026).

⁴ [Housing Maintenance Code Violations - NYC OpenData; https://www.nyc.gov/site/hpd/news/018-26/testimony-the-new-york-city-department-housing-preservation-development-the-new-york](https://www.nyc.gov/site/hpd/news/018-26/testimony-the-new-york-city-department-housing-preservation-development-the-new-york)