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**DOI ISSUES REPORT ON THE PUBLIC SAFETY RISK INVOLVING VACANT APARTMENTS IN THE
NYC PUBLIC HOUSING AUTHORITY (“NYCHA”) AND FIVE RECOMMENDATIONS TO MITIGATE THESE RISKS,
WHICH NYCHA HAS ACCEPTED**

Christopher Ryan, Acting Commissioner of the New York City Department of Investigation (“DOI”), issued a Report today on the public safety risks associated with the significant increase of vacant New York City Housing Authority (“NYCHA”) apartments, which rose from approximately 2,840 in January 2022 to 6,740 as of May 2025. The current average duration of a vacancy is approximately one year. A vacant apartment, for purposes of this Report, is defined as an apartment that has been vacated by the tenant(s) of record and is not the subject of a legal dispute involving a claim to reside in the apartment (such as a licensee or successor claim). Vacant apartments can be refurbished by NYCHA and then provided to a new tenant. Apartments that are involved in legal disputes must be officially vacated (i.e., no individual resides therein and any legal disputes have been resolved) before they are deemed vacant and within NYCHA’s control to freely change the locks, inspect, refurbish, and make available for a new tenant. Because NYCHA’s control over such apartments is limited, the Report focuses on vacant apartments, as defined above. As detailed in the Report, vacant apartments, without adequate security measures, create opportunities for illegal occupancy by unauthorized individuals, some of whom use the apartments as a base for illegal activities. This Report describes conditions discovered in vacant apartments associated with suspected trespassing or other illegal activity and how to mitigate the public safety risks currently posed by vacancies. A copy of the Report is attached to this release; and can be found at this link: <https://bit.ly/4qsgEBZ>

Acting DOI Commissioner Christopher Ryan said, “NYCHA apartments that sit vacant reduce the already limited availability of the City’s public housing stock, and without appropriate security measures, pose a public safety risk for public housing residents, employees and contractors. DOI’s investigation found that NYCHA must do more to stop trespassing and other illegal activity in vacant apartments. The security deficiencies found heighten the risk of illegal occupancy in the thousands of unoccupied units. DOI’s recommendations are meant to strengthen NYCHA’s monitoring of its vacant apartments and reduce the opportunity for crime and other wrongdoing. I thank NYCHA and the New York City Police Department (“NYPD”) for its partnership on this important issue, particularly as it relates to reclaiming apartments and ridding them of illegal activity.”

DOI found that the number and duration of vacancies are due to various factors. These factors include: (1) an increase in transfers of tenants from one NYCHA apartment to another; (2) funding constraints that extend the time required to refurbish a vacant apartment; and (3) an increase in the number of vacant apartments that require lead abatement, due to a local law change lowering the permissible level of lead in lead-based paint. These issues increase both the number of vacancies and the length of time an apartment remains vacant—further limiting availability of the City’s precious public housing stock, for which there is a waitlist of 165,000 applicants.

NYCHA, DOI, and the NYPD have worked collaboratively to recover possession of vacant apartments from unauthorized occupants. In total, from January 2022 to May 2025, the NYPD reclaimed 548 apartments from unauthorized occupants, 60 of which were reclaimed through joint efforts by the NYPD and DOI. The joint reclamation efforts resulted in 81 arrests for an array of charges, including trespassing, criminal possession of a controlled substance, and criminal possession of a weapon, which pose a risk to the NYCHA community at large.

more

DOI found that the following factors contributed to the increase in vacant apartments and the length of those vacancies:

- **Lead and Asbestos Abatement Requirements:** For apartments vacated appropriately, or reclaimed, NYCHA must comply with a number of requirements, principally relating to lead and asbestos testing and abatement, before undertaking the general construction work to refurbish and turnover the apartment. The prevalence of lead and asbestos in NYCHA apartments and the testing and abatement work required are significant drivers of the lengthy turnover process for NYCHA apartments.
- **Costs and Funding:** The average cost to complete the turnover process is approximately \$52,000 (\$17,000 for lead abatement, \$25,000 for asbestos abatement, and \$10,000 for general renovations, though those costs vary widely). While NYCHA receives City funding to aid with apartment turnover, NYCHA faces funding constraints related to the required renovation work (both lead and asbestos work and otherwise), which can further delay completion of that work. Together, these funding issues make it difficult, if not impossible, for NYCHA to materially reduce the length of time necessary to ready an apartment for rental. For that reason, it is particularly important that NYCHA take steps to improve the security of its vacant apartments during the lengthy turnover process.

Based on its investigation, DOI identified the following areas in which NYCHA should improve its current security measures for vacant apartments:

- **Inspections:** NYCHA does not proactively inspect vacant apartments to ensure that the unit is in fact vacant throughout the entirety of the apartment turnover cycle. The absence of regular inspections increases the risk that trespassing and other illegal criminal activity can occur undetected in the vacant apartment and heightens security risks to residents, employees, and contractors. It also delays the discovery of unauthorized occupants and the initiation of the recovery process. NYCHA takes the position that staff responsible for renovating the vacant apartment can report any signs of unauthorized occupancy or other illegal activity that they observe in the course of renovation-related tasks, obviating the need for additional inspections. Reporting by such staff alone is insufficient.
- **Locks:** Ensuring that a vacant apartment is properly secured is a critical measure to reduce the risk of unauthorized occupants, and potentially, related illegal activity. NYCHA's vacant units are especially vulnerable to trespassing because NYCHA procedure currently requires that NYCHA developments use the same lockset—and, thereby, the same key—for all vacant apartments within that particular NYCHA development, presenting the risk that individuals could, upon acquiring a key, access any vacant unit in the development. In some instances, NYCHA employees deviate from the required practice and fit vacant units with a "65 key"—a generic lockset used not only for vacant apartments in this instance, but also Authority-wide for certain rooms within NYCHA buildings, including some utility spaces and management offices. That is, this occasional, unauthorized use of a 65 key creates additional risk because the keys can be used not only for vacant units but also other spaces within NYCHA.

It is NYCHA's position that using unique keys for each vacant unit poses significant operational challenges, because many different employees and contractors must access a vacant apartment during the renovation process. NYCHA's policy poses an unacceptable risk of facilitating unauthorized occupancy and even criminal conduct in vacant units, particularly in light of the absence of regular apartment inspections.

- **Resident Involvement:** NYCHA has a Resident Watch program that is empowered to patrol and report suspected unlawful activity. NYCHA should more actively and effectively engage this program to encourage reporting of suspected trespassing in vacant units.

As a result of these findings, DOI issued the following five recommendations:

1. The Authority should edit Standard Procedure, 040:22:2, Apartment Turnover, Monthly Building, and Other Maintenance Inspections, to require that Property Management conduct monthly inspections (e.g., check the windows and door locks, check for signs of unauthorized occupants - personal belongings, waste) in vacant apartments that are not ready for rental—i.e., units that have been vacated by the tenant(s) of record and are not the subject of a legal dispute, and thus can be inspected by NYCHA. During those inspections, Property Management should secure vacant apartments, ensuring operational window and door locks, to prevent trespassing. If Property Management discovers that there is/are (an) unauthorized individual(s)

during an inspection, the Property Management employee should immediately (no later than 72 hours after discovery) make a report to NYCHA's Law Department.

NYCHA accepts. NYCHA, however, states that it will need approximately one year to implement this recommendation, as NYCHA Information Technology will need to create new auto-generated work orders for these inspections.

2. NYCHA should evaluate the feasibility of alternative locksets or security technologies, including electronic locks and keys. While studying these alternatives, NYCHA should edit Standard Procedure, 040:22:2, Apartment Turnover, Monthly Building, and Other Maintenance Inspections, to require that developments have multiple (a minimum of two or three, depending on the quantity of vacancies at a development) versions of move-out cylinders (and their related keys) to use on a rotating basis. This will reduce the number of apartments within a development that can be accessed by a single key. No two developments should use the same versions of keys. If NYCHA determines that an alternative lockset is feasible, then NYCHA should update the aforementioned Standard Procedure accordingly.

NYCHA accepts.

3. The Authority should edit Standard Procedure, 001:17:1, Resident Watch Guidelines, to require that Resident Watch volunteers report to the Resident Watch Supervisor any suspected unauthorized inhabitants or illegal activity in a vacant apartment. The Resident Watch Supervisor should (1) inform Property Management of any such discoveries by the end of their shift and (2) include any such reports on their Quality of Life form. The Resident Watch should not take any action regarding these individuals other than reporting such apartments to Property Management. NYCHA should also train Resident Watch related to this requirement.

NYCHA accepts. NYCHA, however, states that it will need approximately six months to a year to implement the portion of this recommendation pertaining to the Quality of Life form, as NYCHA Information Technology will need to make an enhancement to said form.

4. Upon receipt of such a report from the Resident Watch Supervisor, as described in recommendation 3 above, Property Management should immediately seek to confirm the information and, if verified, immediately (no later than 72 hours after discovery) make a report to NYCHA's Law Department.

NYCHA accepts.

5. If/when the Authority receives additional funding for refurbishment of vacant apartments, NYCHA should deploy that funding so as to reduce the period of time necessary to complete refurbishment.

NYCHA accepts, subject to funding.

Acting DOI Commissioner Ryan thanked NYCHA CEO Lisa Bova-Hiatt and her staff for their cooperation and assistance during this investigation and NYPD Commissioner Jessica S. Tisch for her and her Department's partnership on the joint apartment reclamation efforts.

The investigation was conducted by Assistant Inspectors General Enio Bencosme and Robert Joyce, Deputy Inspector General Gregory Deboer, and Deputy Counsel Lauren Kropiewnicki of DOI's Office of the Inspector General for NYCHA, under the supervision of Inspector General Ralph Iannuzzi and Deputy Commissioner/Chief of Investigations Dominick Zarrella.

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New York City
Department of Investigation

DOI's Investigation Into the Reclamation of Vacant NYCHA Apartments

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Table of Contents

| | |
|--|----|
| I. Executive Summary | 1 |
| II. Background..... | 5 |
| A. NYCHA’s Organization and Turnover of Vacant Apartments | 5 |
| B. Apartment Reclamation | 6 |
| C. Factors Contributing to the Increased Quantity and Duration of Vacancies | 7 |
| 1. <i>Lead and Asbestos Abatement Requirements</i> | 9 |
| 2. <i>Costs and Funding</i> | 9 |
| III. Findings | 10 |
| A. Trespassing and Reclamations..... | 10 |
| 1. <i>Castle Hill Houses</i> | 12 |
| 2. <i>Mitchel Houses</i> | 12 |
| 3. <i>Surfside Gardens Houses</i> | 13 |
| B. Areas for Improvement..... | 14 |
| 1. <i>Inspections</i> | 14 |
| 2. <i>Locks</i> | 15 |
| 3. <i>Resident Involvement</i> | 16 |
| IV. Recommendations | 17 |
| V. Conclusion..... | 18 |

I. Executive Summary

The number of vacant apartments in New York City Housing Authority (“NYCHA” or the “Authority”) properties has increased in recent years, from approximately 2,840 vacancies in January 2022 to approximately 6,740 vacancies as of May 2025.¹ The current average duration of a vacancy is approximately one year.^{2,3} This Report details the areas in which NYCHA should improve its current security measures for vacant units, as defined below; the joint efforts of the New York City Department of Investigation (“DOI”), the New York City Police Department (“NYPD”), and NYCHA to reclaim unlawfully occupied apartments; and the instances of trespassing and other criminal activity discovered in certain vacant units as a result of these joint efforts. This Report also makes five recommendations to NYCHA to enhance the security of its vacant apartments.

A vacant apartment,⁴ for purposes of this Report, is defined as an apartment that has been vacated by the tenant(s) of record and is not the subject of a legal dispute involving a claim to reside in the apartment (such as a licensee or successor claim). Vacant apartments can be refurbished by NYCHA and then provided to a new tenant. Apartments that are involved in legal disputes must first be officially vacated (i.e., no individual resides therein and any legal disputes have been resolved) before they are deemed vacant and within NYCHA’s control to freely change the locks, inspect, refurbish, and make available for a new tenant. Because NYCHA’s control over such apartments is limited, this Report focuses on vacant apartments, as defined above.

The number and duration of NYCHA vacancies are due to various factors. These factors include: (1) an increase in transfers of tenants from one NYCHA apartment to another;⁵ (2) funding constraints that extend the time required to refurbish a vacant apartment;⁶ and (3) an increase in the number of vacant

¹ N.Y.C. Housing Auth., NYCHA Metrics, Vacancies, https://eapps.nycha.info/NychaMetrics/Charts/PublicHousingChartsTabs/?section=public_housing&ab=tab_repairs (last visited Feb. 13, 2026).

² *Id.*

³ In August 2024, the monthly average was 425 days, the highest in the period addressed in this Report. In May 2025, the monthly average was 376 days.

⁴ NYCHA has three types of vacant apartment units: units undergoing refurbishment (also referred to as turnover units); units that are unavailable and off the rent roll, both permanently and temporarily; and matched units (units that have been refurbished and for which a new tenant has been identified). See *infra* note 16.

⁵ Approximately 60% of NYCHA move-ins are resident transfers, meaning that 60% of move-ins create a new vacancy. NYCHA also maintains a number of vacant units available for tenants that the Authority must transfer/relocate due to comprehensive modernization projects.

⁶ See *infra* II, C, 2.

apartments that require lead abatement, due to a local law change lowering the permissible level of lead in lead-based paint.⁷ These issues increase both the number of vacancies and the length of time an apartment remains vacant—further reducing the availability of the City’s limited stock of public housing, for which there is a waitlist of approximately 165,000 applicants.⁸ When apartments are vacant for lengthy periods of time without adequate security measures, they may pose a safety risk for NYCHA residents, staff, and vendors. Such apartments may become illegally occupied by unauthorized individuals and may be used as a base for illegal activities.

NYCHA, DOI, and the NYPD have worked collaboratively to recover possession of vacant apartments from unauthorized occupants. From January 2022 to May 2025, NYPD recovered possession of 548 NYCHA apartments from unauthorized occupants;⁹ of these 548 reclamations, 60 were effectuated through joint efforts of DOI and NYPD.¹⁰ The joint DOI and NYPD reclamation efforts resulted in the arrests of 81 individuals engaged in criminal activity in, or with respect to, the apartments—arrests resulting in charges such as trespassing, criminal possession of a controlled substance, and criminal possession of a weapon.

Factors contributing to the risks associated with vacant apartments include NYCHA’s lack of regular inspections and inadequate lock procedures for such apartments. Indeed, DOI found that NYCHA does not proactively inspect its vacant apartments that are awaiting refurbishment, or are being refurbished, but are not yet ready for rental.¹¹ Renovating an apartment can take up to one year, therefore many apartments are not subject for that entire period to inspections that could reveal trespassers or other illegal activity, though staff enter apartments to conduct work during that time. NYCHA’s procedure also does not require unique locks (or at

⁷ See *infra* II, C, 1.

⁸ N.Y.C. Housing Auth., NYCHA Metrics, Vacancies, https://eapps.nycha.info/NychaMetrics/Charts/PublicHousingChartsTabs/?section=public_housing&ab=tab_repairs (last visited Feb. 13, 2026).

⁹ *Examining the Cause of Vacancies in NYCHA Properties: Meeting of the Committee on Public Housing*, (N.Y.C. Council 2025), <https://legistar.council.nyc.gov/MeetingDetail.aspx?ID=1313799&GUID=6679618F-2971-48C8-B9FF-A3CC69EC72F4&Options=info|&Search=> (NYPD provided these numbers in their testimony to the N.Y.C. Council during this hearing. Based on the available information, DOI is unable to determine how many of these units were vacant, as defined in this Report.).

¹⁰ In September 2024, NYCHA began to require centralized reporting and documentation of suspected trespassing in NYCHA apartments. Over the following year, from September 2024 to September 2025, NYCHA recorded 305 vacant apartments occupied by a suspected unauthorized individual, 296 of which resulted in reclamation (included within the 548), and as of September 2025, 9 of which remained occupied by residents whose rights to reside in the unit were under review by NYCHA’s Law Department.

¹¹ See *infra* III, B, 1.

least a variety of locks) for vacant apartments, and instead requires the use of a single key (called a “move-out key”) for all vacant apartments at a development.¹² While use of a single key for all apartments is most efficient for workers handling renovations of multiple apartments, it poses unacceptable safety risks, as access to this move-out key means access to—and the ability to improperly utilize—any vacant apartment in that development.

Therefore, for vacant apartments, it is DOI’s recommendation that NYCHA implement regular inspections and use keys that restrict access to a smaller number of apartments. It is also DOI’s recommendation that NYCHA empower and educate Resident Watch volunteers¹³ so that they are aware and ready to report circumstances that may indicate that a vacant apartment has been taken over by unauthorized individuals. DOI’s findings make clear that there are risks of trespassing and illegal occupancy in vacant units. These risks would be mitigated if NYCHA implements DOI’s five recommendations, included below, to strengthen NYCHA’s oversight of its vacant apartments:

1. The Authority should edit Standard Procedure, 040:22:2, Apartment Turnover, Monthly Building, and Other Maintenance Inspections, to require that Property Management conduct monthly inspections (e.g., check the windows and door locks, check for signs of unauthorized occupants [personal belongings, waste]) in vacant apartments that are *not* ready for rental—i.e., units that have been vacated by the tenant(s) of record and are not the subject of a legal dispute, and thus can be inspected by NYCHA. During those inspections, Property Management should secure vacant apartments, ensuring operational window and door locks, to prevent trespassing. If Property Management discovers that there is/are (an) unauthorized individual(s) during an inspection, the Property Management employee should immediately (no later than 72 hours after discovery) make a report to NYCHA’s Law Department. **NYCHA accepts. NYCHA, however, states that it will need approximately one year to implement this recommendation, as NYCHA Information Technology will need to create new auto-generated work orders for these inspections.**

¹² See *infra* III, B, 2.

¹³ Resident Watch is a voluntary program, and developments and buildings opt in to the program. Resident Watch volunteers may not cover all floors or areas within each building. There is currently an active Resident Watch at over 100 NYCHA developments.

2. NYCHA should evaluate the feasibility of alternative locksets or security technologies, including electronic locks and keys. While studying these alternatives, NYCHA should edit Standard Procedure, 040:22:2, Apartment Turnover, Monthly Building, and Other Maintenance Inspections, to require that developments have multiple (a minimum of two or three, depending on the quantity of vacancies at a development) versions of move-out cylinders (and their related keys) to use on a rotating basis. This will reduce the number of apartments within a development that can be accessed by a single key. No two developments should use the same versions of keys. If NYCHA determines that an alternative lockset is feasible, then NYCHA should update the aforementioned Standard Procedure accordingly. **NYCHA accepts.**
3. The Authority should edit Standard Procedure, 001:17:1, Resident Watch Guidelines, to require that Resident Watch volunteers report to the Resident Watch Supervisor any suspected unauthorized inhabitants or illegal activity in a vacant apartment. The Resident Watch Supervisor should (1) inform Property Management of any such discoveries by the end of their shift and (2) include any such reports on their Quality of Life form. The Resident Watch should not take any action regarding these individuals other than reporting such discoveries to Property Management. NYCHA should also train Resident Watch related to this requirement. **NYCHA accepts. NYCHA, however, states that it will need approximately six months to a year to implement the portion of this recommendation pertaining to the Quality of Life form, as NYCHA Information Technology will need to make an enhancement to said form.**
4. Upon receipt of such a report from the Resident Watch Supervisor, as described in recommendation 3 above, Property Management should immediately seek to confirm the information and, if verified, immediately (no later than 72 hours after discovery) make a report to NYCHA's Law Department. **NYCHA accepts.**
5. If/when the Authority receives additional funding for refurbishment of vacant apartments, NYCHA should deploy that funding so as to reduce the period of time necessary to complete refurbishment. **NYCHA accepts, subject to funding.**

II. Background

The following is background information pertinent to DOI's findings: the relevant NYCHA offices for reclamation and turnover; NYCHA's apartment reclamation process, including NYCHA's coordination with DOI and NYPD; and factors contributing to the increased quantity and duration of vacant apartments.

A. NYCHA's Organization and Turnover of Vacant Apartments

NYCHA's Law Department, Housing Litigation Division, which is overseen by the Vice President and Deputy General Counsel of Housing Litigation, leads NYCHA's investigation and litigation of apartment occupancy disputes and coordinates with NYPD and DOI on reclamation. The relevant NYPD office for those reclamations is the Housing Bureau Reclamation Unit ("HBRU")—founded in 2023 by NYPD's Housing Bureau, with guidance from NYCHA's Law Department—to centralize NYPD's apartment reclamation operations and better coordinate with NYCHA.¹⁴

After an apartment has been vacated or reclaimed, and any occupancy disputes have been resolved, then NYCHA can begin apartment turnover—i.e., the process of making an apartment entirely ready for occupancy. Various NYCHA offices and employees are responsible for aspects of the apartment turnover process. Property management operations, and certain work related to apartment turnover (i.e., lead-based paint and asbestos testing and abatement), is overseen by the Executive Vice President for Property Management Operations ("EVP for PMO"), who reports to the Chief Operating Officer ("COO"). The EVP for PMO oversees NYCHA's Healthy Homes Unit, which is led by a Senior Vice President and responsible for lead-based paint and asbestos testing and abatement oversight. Lead and asbestos testing and abatement is complex work that is primarily done by vendors and is overseen by NYCHA's Healthy Homes Unit.

Apartment turnover also requires skilled-trades work (e.g., painting, plastering, and tiling), the majority of which is handled by Property Management

¹⁴ See N.Y.P.D., Bureaus, Housing (2025) <https://www.nyc.gov/site/nypd/bureaus/transit-housing/housing.page> (last visited Feb. 13, 2026) ("The Housing Bureau is responsible for the safety of nearly a half-million residents, employees, and visitors in the city's housing developments. Working in close coordination and partnership with resident patrols, community groups, and development managers, members of the Housing Bureau are committed to effectively reducing crime and aggressively targeting violations and other conditions that detract from the quality of life for residents in and around New York City Housing Developments.").

Operations, overseen by Vice Presidents (“VPs”) for Property Management, based in boroughs, who report to the EVP for PMO. In some cases, turnover is handled by vendors and/or NYCHA’s Technical Services Department.

B. Apartment Reclamation

Reclamation is the process of removing unauthorized occupants from a NYCHA apartment. It generally involves three phases: a report of suspected unauthorized occupancy; an investigation of the legal rights of the occupant(s), and litigation, if necessary; and the reclamation operation. Apartments that are already designated as vacant (as defined in this Report), and have been occupied by a trespasser (someone with no right to be in the apartment), may generally be immediately reclaimed by NYPD, after NYCHA investigates and substantiates the report.¹⁵ Cases of suspected unauthorized occupancy of apartments that are not technically vacant generally take much longer to resolve due to not only investigation, but also litigation in certain circumstances.

In most cases, first, NYCHA staff, DOI, and/or NYPD inform(s) the Housing Litigation Division of NYCHA’s Law Department that there is a vacant apartment that appears to be occupied by a potentially unauthorized individual. Investigators from NYCHA’s Law Department then investigate and conduct outreach (with the tenant of record, next of kin, etc.) to determine whether the occupant has a legal right to remain in the apartment. This can take varying lengths of time due to a variety of factors, including the ease of communicating with and receiving documentation from individuals such as the current occupant(s), prior tenant(s) of record, and any other individual(s) relevant to the case. If the occupant is found to lack such legal rights, NYCHA’s Law Department authorizes NYPD and DOI (or NYPD solely when the reclamation is not a joint operation) to recover the vacant apartment. NYPD (HBRU), in coordination with DOI (when it’s a joint operation), may then enter the apartment, arrest the occupants, if appropriate, and escort the occupant(s) out of the unit. Finally, NYCHA secures the apartment and can begin turnover.

If any individual asserts an occupancy claim that NYCHA disputes, then the dispute must be litigated in an administrative hearing and/or New York City Housing Court. A full adjudication, including possible appeal, can take over 24 months. When these disputes are ongoing, NYCHA’s potential security measures are constrained,

¹⁵ N.Y. Real Property Actions and Proceedings Law § 711 (In April 2024, New York State updated its landlord-tenant statute to specify that a “squatter” is not considered a tenant for purposes of the statute and associated tenancy protections).

as such occupants are generally permitted to reside in the unit (with the same rights to control the apartment that a legitimate tenant has) until a judicial decision is reached. Thus, NYCHA cannot change the locks or conduct monthly security inspections of these units during this period because they are considered to be occupied.

It is also worth noting that, prior to 2024, NYCHA did not have formalized procedures in place intended to address suspected trespassing in its vacant apartments, including with respect to reporting and documentation. Staff instead would generally call NYPD to report trespassing with varied results. However, in September 2024, NYCHA created a uniform procedure, and began requiring staff to call NYPD in response to trespassing only when there is a perceived imminent threat to public safety; NYCHA also began regularly recording information about suspected trespassing incidents and the apartments involved. As a result, there is less data concerning suspected trespassing and reclamations for the period prior to September 2024 than thereafter.

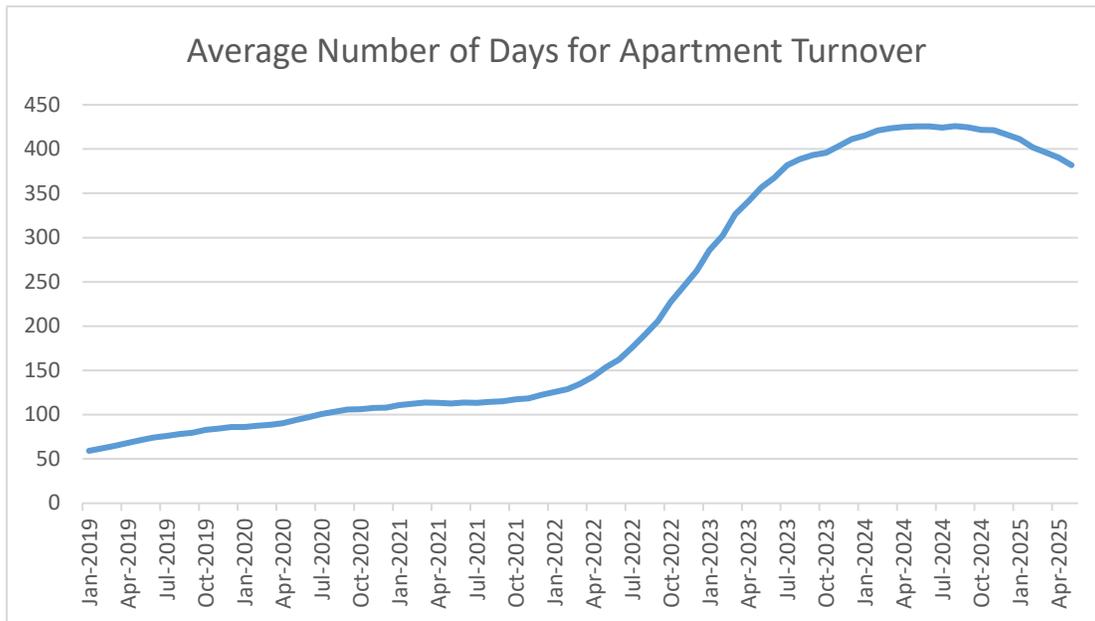
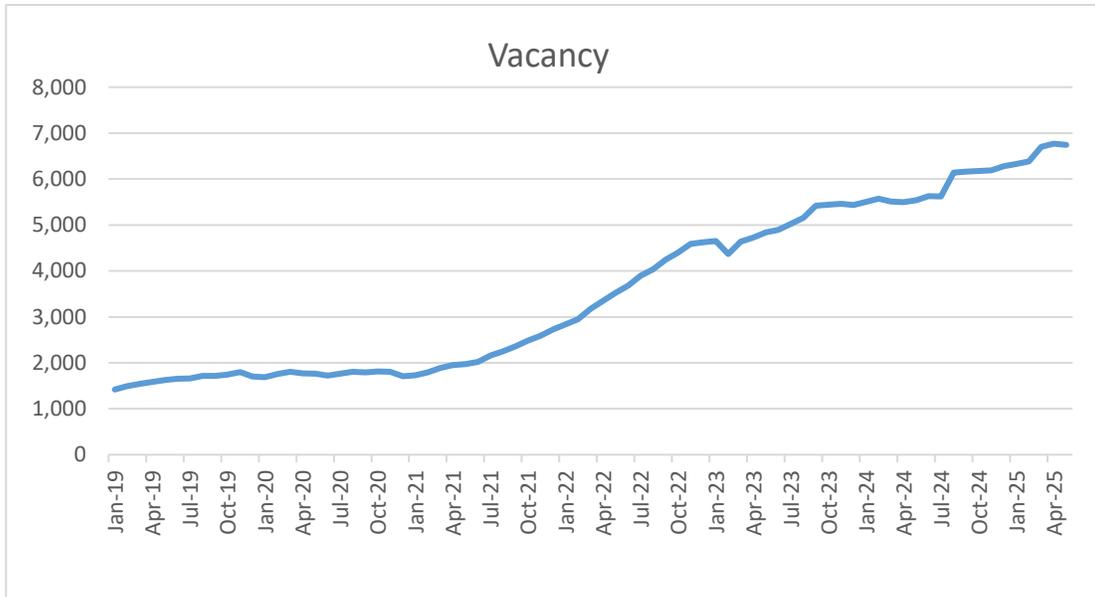
C. Factors Contributing to the Increased Quantity and Duration of Vacancies

As shown in the tables below, NYCHA vacancies¹⁶ have increased from approximately 2,840 in January 2022 to approximately 6,740 as of May 2025, and the average vacancy duration is currently approximately one year.^{17,18}

¹⁶ NYCHA has three types of vacant units: (1) units undergoing turnover; (2) units that are unavailable and off the rent roll, including (a) permanently off rent-roll units, which (i) are being converted to Permanent Affordability Commitment Together (“PACT”) apartments, (ii) are uninhabitable and cannot be rehabilitated, or (iii) are being used for another purpose (e.g., as a NYCHA Property Management office, for a NYCHA Resident Association, or by NYPD as a room for law enforcement purposes); and (b) temporary off rent-roll units, which are designated for short-term relocations (i) resulting from fire/explosion/disaster, (ii) during modernization efforts (i.e., comprehensive modernization), and (iii) for disability/accessibility modification; and (3) matched vacant units, which have been matched to prospective tenants. The second category of vacant units—units that are unavailable and off the rent roll—is not included in this vacancy total.

¹⁷ NYCHA provided these data sets to DOI on July 14, 2025. The charts do not include April 2021, when NYCHA had a system error that affected the Authority’s data accuracy. *See also* N.Y.C. Housing Auth., NYCHA Metrics, Vacancies, https://eapps.nycha.info/NychaMetrics/Charts/PublicHousingChartsTabs/?section=public_housing&ab=tab_repairs (last visited Feb. 13, 2026).

¹⁸ In August 2024, the average vacancy duration was 425 days, the highest during the period addressed in this Report. In May 2025, the monthly average was 376 days.



Factors affecting NYCHA’s increased vacancy and turnover timeline include ensuring that the apartment complies with lead and asbestos abatement requirements, in addition to general renovation work; overall funding constraints; and, depending on the circumstances, tenant transfer and relocation.¹⁹ The nature of these processes and costs are summarized below.

¹⁹ As approximately 60% of NYCHA move-ins are resident transfers, the elimination of one vacant apartment creates a new vacancy 60% of the time. NYCHA also must keep certain vacant units reserved for relocation of tenants due to comprehensive modernization projects.

1. Lead and Asbestos Abatement Requirements

Once apartments have been vacated and are within NYCHA's authority to refurbish, NYCHA must comply with a number of requirements—principally lead and asbestos testing and abatement—before undertaking the general construction work to refurbish and turnover the apartment.

NYCHA's lead testing and abatement obligations are governed by federal, state, and local laws and regulations. These include, on the City level, Local Law 66 of 2019,²⁰ which lowered the legal limit of lead in lead-based paint from 1.0 mg/cm² to 0.5 mg/cm², effective December 1, 2021, and resulted in an approximately 20% increase in the percentage of NYCHA apartments testing positive for lead and therefore requiring abatement.²¹ NYCHA also has obligations related to lead visual inspections, testing, and abatement from its January 31, 2019, agreement with the U.S. Department of Housing and Urban Development, the U. S. Attorney's Office for the Southern District of New York, and New York City ("Settlement Agreement"), which resolved a federal lawsuit against NYCHA alleging unlawful apartment conditions, including the failure to properly test for and abate lead-based paint. City law also governs NYCHA's asbestos abatement responsibilities, which affect the majority of the Authority's apartments. NYCHA records indicate that approximately 80% of the Authority's vacant apartments contain asbestos-containing materials—primarily vinyl asbestos floor tiles and asbestos-containing ceiling coatings—that may be affected during renovation and require abatement.²² The prevalence of lead and asbestos in NYCHA apartments, and the testing and abatement work required, are significant drivers of the lengthy turnover process for NYCHA apartments.

2. Costs and Funding

The average cost to complete the turnover process is approximately \$52,000 (\$17,000 for lead abatement, \$25,000 for asbestos abatement, and \$10,000 for general

²⁰ See N.Y.C. Admin. Code § 27-2056.2(7)(b) (codification of Local Law 66 of 2019's 0.5 mg/cm² standard).

²¹ Prior to December 1, 2021 (the effective date of Local Law 66 of 2019), the legal limit of lead in lead-based paint was still 1.0 mg/cm². Under the 1.0 mg/cm² standard, approximately 25% of NYCHA's apartments were testing positive for lead. Under the new 0.5 mg/cm² standard, approximately 45% of NYCHA's apartments are testing positive.

²² *Examining the Cause of Vacancies in NYCHA Properties: Meeting of the Committee on Public Housing*, (N.Y.C. Council 2025), <https://legistar.council.nyc.gov/MeetingDetail.aspx?ID=1313799&GUID=6679618F-2971-48C8-B9FF-A3CC69EC72F4&Options=info|&Search=>; see also N.Y.C. Housing Auth., 2025-2029 Capital Plan Narrative Final, <https://www.nyc.gov/assets/nycha/downloads/pdf/2025-2029-Capital-Plan-Narrative-Final.pdf> (last visited Feb. 13, 2026).

renovations, though those costs vary widely). While NYCHA receives City funding to aid with apartment turnover, NYCHA faces general funding constraints, including those related to the required renovation work (both lead and asbestos abatement work and otherwise), which can further delay completion of that work. First, once NYCHA has used the allotted funding for the particular year, monthly progress on renovation work inevitably declines until funding for the next year becomes available, and second the Authority prioritizes renovations of occupied apartments, rather than vacant units, and allocates funding accordingly.²³ Together, these funding issues make it difficult, if not impossible, for NYCHA to materially reduce the length of time necessary to ready an apartment for rental. For that reason, it is particularly important that NYCHA take steps to improve the security of its vacant apartments during the lengthy turnover process.

III. Findings

A. Trespassing and Reclamations

The Authority maintains over 150,000 apartments in its conventional²⁴ housing portfolio, and of those 150,000 apartments, approximately 140,000 were occupied as of May 2025, leaving approximately 6,700 units vacant (within the meaning described above).²⁵ NYPD's HBRU, since its inception in 2023, has documented reclaiming over 548 NYCHA apartments, with assistance from NYCHA in the preceding investigations: 100 in 2023; 356 in 2024; and 92 in 2025 (as of June

²³ For vacant units, skilled-trades work is performed primarily during overtime assignments to preserve capacity for resident work orders in occupied units, and therefore requires funding that can be appropriated to overtime.

²⁴ Conventional housing refers to NYCHA's apartments that receive funding through Section 9 of the United States Housing Act of 1937 and are managed by NYCHA Property Management. This Report does not address the 170,000 privately-owned Section 8 housing units for which NYCHA administers the housing voucher program, because those units are not managed by NYCHA Property Management.

²⁵ NYCHA has three types of vacant units: (1) units undergoing turnover; (2) units that are unavailable and off the rent roll, including (a) permanently off rent-roll units, which (i) are being converted to Permanent Affordability Commitment Together ("PACT") apartments, (ii) are uninhabitable and cannot be rehabilitated, or (iii) are being used for another purpose (e.g., as a NYCHA Property Management office, for a NYCHA Resident Association, or by NYPD as a room for law enforcement purposes); and (b) temporary off rent-roll units, which are designated for short-term relocations (i) resulting from fire/explosion/disaster, (ii) during modernization efforts (i.e., comprehensive modernization, discussed below), and (iii) for disability/accessibility modification; and (3) matched vacant units, which have been matched to prospective tenants. In total, NYCHA has approximately 10,000 vacant units, a figure which includes all types of vacant units. The 6,700 figure excludes units that are unavailable and off the rent roll.

2025).^{26,27} Joint DOI and NYPD efforts reclaimed 60 of these 548 apartments and arrested 81 unauthorized occupants engaged in criminal activity in, or with respect to, the apartments. These charges include trespassing (81), criminal possession of a controlled substance (17), and criminal possession of a weapon (3), amongst others.²⁸

From September 2024 through September 2025, the first year following NYCHA's implementation of specified reporting procedures for suspected trespassing in its apartments (as discussed above),²⁹ NYCHA became aware of a total of 305 apartments that were occupied by a suspected unauthorized individual. 296 of these apartments (included within the 548) have since been reclaimed and, as of September 2025, 9 were occupied by residents whose right to reside in the apartment remained under consideration by NYCHA's Law Department.

Below are examples of conditions discovered by NYPD, or NYPD and DOI jointly, during reclamation operations in vacant NYCHA apartments. Because of NYCHA's information-keeping practices prior to September 2024, the vacancy duration and other details about the particular apartments discussed in the examples are not available.

²⁶ Prior to NYPD's formation of its HBRU, NYPD was permitted to reclaim an apartment without approval from NYCHA's Law Department, while DOI was required to obtain approval before reclaiming an apartment. Both DOI and NYPD now obtain NYCHA Law Department approval prior to reclamation.

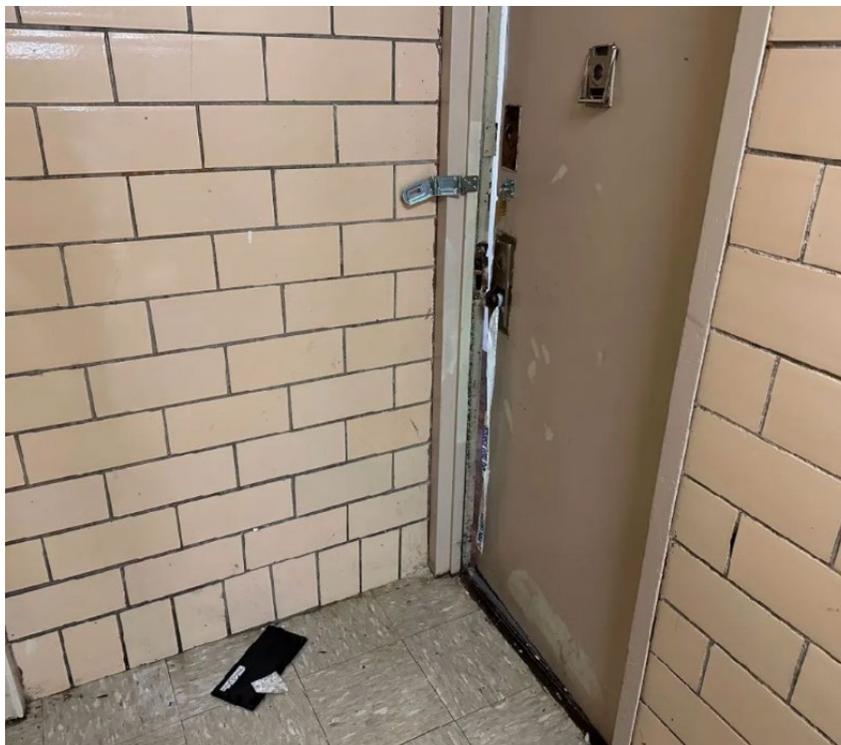
²⁷ *Examining the Cause of Vacancies in NYCHA Properties: Meeting of the Committee on Public Housing*, (N.Y.C. Council 2025), <https://legistar.council.nyc.gov/MeetingDetail.aspx?ID=1313799&GUID=6679618F-2971-48C8-B9FF-A3CC69EC72F4&Options=info|&Search=> (NYPD provided these numbers in their testimony to the N.Y.C. Council during this hearing. Based on the available information, DOI is unable to determine how many of these units were vacant, as defined by this Report.).

²⁸ Criminal Possession of a Controlled Substance (N.Y. Penal Law §§ 220.03 and 220.16); Criminally Using Drug Paraphernalia (§ 220.50); Criminal Possession of a Weapon (§§ 265.01, and 265.03); Grand Larceny (§ 155.30); Forgery (§ 170.15); Criminal Possession of a Forged Instrument (§ 170.20); Criminal Possession of Stolen Property (§ 165.45).

²⁹ *See supra* II, B.

1. Castle Hill Houses

In May 2023, NYPD officers responded to a 911 call and found a victim fatally shot in a vacant apartment in the Castle Hill Houses in the Bronx. NYPD reported that the victim allegedly was a member of the “Sex Money Murder” organization; had 28 prior arrests, including for robberies, burglaries, and grand larcenies; and had a current I-Card³⁰ for robbery.



Above is a photograph from a New York Daily News article showing the entrance to a vacant apartment in NYCHA’s Castle Hill Houses where NYPD officers found a deceased shooting victim.³¹

2. Mitchel Houses

After this Mitchel Houses unit was properly vacated on August 2, 2022, NYCHA suspected that unauthorized individuals had broken into the unit and were

³⁰ NYPD issues an “I-Card” (“Activate Investigation Card”) if there is probable cause to believe that an individual committed a felony.

³¹ Andrew Califf et al., *Aspiring young actor found slain in vacant Bronx NYCHA apartment, family shocked: ‘Had a whole future going for him’ (EXCLUSIVE)*, New York Daily News (May 21, 2023) <https://www.nydailynews.com/2023/05/21/aspiring-young-actor-found-slain-in-vacant-bronx-nycha-apartment-family-shocked-had-a-whole-future-going-for-him-exclusive/> (last visited Feb. 13, 2026).

residing therein. NYCHA reported this information to DOI on March 28, 2023. After DOI completed its investigation, including database searches and interviews of NYCHA staff, in May 2023, DOI and NYPD arrested a woman residing in the apartment who was charged with child neglect.



Pictured above are photographs of the conditions found in the vacant Mitchel Houses apartment.³²

3. Surfside Gardens Houses

On May 17, 2023, when Property Management for this development entered the apartment to complete turnover work, Property Management discovered two illegal occupants in the apartment and immediately notified NYPD of the situation.³³ That same day, NYPD responded; apprehended two individuals, both of whom were allegedly affiliated with the “Untouchable Gorilla Stone Nation” organization; and recovered one pistol and one loose 0.380 cartridge.

³² Source: DOI.

³³ Prior to 2024, NYCHA did not have procedures in place intended to address suspected trespassing in its apartments, including with respect to reporting. Staff instead would generally call NYPD to report trespassing—instead of notifying NYCHA’s Law Department (as is done now)—with varied results. Staff still call NYPD immediately if there is an imminent threat to public safety.

B. Areas for Improvement

1. Inspections

NYCHA does not proactively inspect its vacant apartments to ensure that the unit is in fact vacant throughout the entirety of the apartment turnover cycle. NYCHA procedure currently requires that Property Management inspect for unauthorized occupants only in vacant apartments that are *ready for rental*, meaning that any necessary renovations have been completed. Because renovations generally take one year on average to complete, NYCHA's vacant apartments are not inspected for unauthorized tenants or other signs of illegal activity for approximately one year, though staff enter the apartments to conduct work during that time.

After an apartment becomes ready for rental, NYCHA recommends an inspection every 14 days and requires an inspection every 30 days.³⁴ NYCHA's Property Management staff conduct monthly grounds inspections and could inspect vacant apartments in the course of those inspections. However, NYCHA has represented that Property Management staff are not required to do so because they are not sufficiently staffed to handle such inspections in addition to their existing responsibilities. NYCHA also takes the position that staff responsible for renovating the vacant apartment can report any signs of unauthorized occupancy or other illegal activity that they observe while completing renovation-related tasks, obviating the need for additional inspections.³⁵

Such reporting alone is not sufficient. First, renovation work generally does not start immediately after an apartment is vacated. Second, renovation work may occur intermittently during a year-long turnover process. Third, reporting in the course of the renovation of an apartment may not significantly mitigate the risk of unauthorized occupancy, because Property Management employees are not explicitly required to make such reports in the course of their renovation work, although they often do so, and the locks currently used by NYCHA for vacant apartments increase

³⁴ N.Y.C. Housing Auth., NYCHA Standard Procedure, 040:22:2, Apartment Turnover, Monthly Building, and Other Maintenance Inspections (During these inspections in vacant apartments that are ready for rental, Property Management must “secure apartments including windows *to prevent squatters and unauthorized individuals from entering the apartment* [emphasis added]; lights must be turned off; appliances must be turned off; plumbing fixture valves should be in the off position.”).

³⁵ NYCHA has agreed, at the request of the Office of the Inspector General for the United States Department of Housing and Urban Development, that the Authority include vacant apartments in their annual apartment inspections, which NYCHA had not previously done. But these annual inspections are intended only for the purpose of identifying certain habitability conditions (e.g., mold, leaks)—not to identify unauthorized occupants and secure the premises. Furthermore, annual inspections are insufficient to identify and prevent unauthorized occupants.

the risk of unauthorized use or residency, even while an apartment is undergoing turnover-related renovations.³⁶ Therefore, relying on renovation staff reporting alone is not a meaningful solution to the potential public safety risk posed by unauthorized occupants. The absence of regular inspections increases the risk that trespassing and other illegal criminal activity can occur undetected in the vacant apartment and heightens security risks to the NYCHA community at large. It also delays the discovery of unauthorized occupants and the initiation of the recovery process.

2. Locks

Ensuring that a vacant apartment is properly secured is a critical measure to reduce the risk of unauthorized occupants, and potentially, related illegal activity. NYCHA's vacant units are especially vulnerable to trespassing because the Authority uses generic locksets to secure vacant apartments throughout NYCHA developments. A generic lockset is a mass-produced lockset comprised of an identical lock and key that is used for multiple units and/or other rooms across NYCHA buildings, depending on the type of generic key.

NYCHA procedure currently requires that Property Management replace the unique tenant cylinder (and its related key) with a move-out cylinder: a generic, development-wide lockset for vacant units.³⁷ This means that NYCHA developments are required to use the same lockset—and, thereby, the same key—for all vacant apartments within that particular NYCHA development, presenting the risk that individuals could, upon acquiring a key, access any vacant unit in the development. In some instances, Property Management staff deviate from the required practice and fit vacant units with a “65 key”—a generic lockset used not only for vacant apartments in this instance, but also Authority-wide for certain rooms within NYCHA buildings, including some utility spaces and management offices. That is, Property Management's occasional and unauthorized practice creates additional risk by using a generic lockset for vacant apartments that is also used for other spaces within NYCHA.

This risk is not merely theoretical. In one apartment reclamation operation, DOI and NYPD found a 65 key left inside a vacant apartment. While this does not necessarily prove that the unauthorized occupant(s) used this key to access the

³⁶ N.Y.C. Housing Auth., Standard Procedure, 040:22:2, Apartment Turnover, Monthly Building, and Other Maintenance Inspections (In vacant apartments that are ready for rental, Property Management must “secure apartments including windows *to prevent squatters and unauthorized individuals from entering the apartment* (emphasis added); lights must be turned off; appliances must be turned off; plumbing fixture valves should be in the off position.”).

³⁷ *Id.*

vacant apartment, it does indicate that the unauthorized occupant(s) of that particular apartment likely had access to that key left inside the unit, and thus had access to numerous other apartments and spaces within NYCHA.

It is NYCHA's position that using unique keys for each vacant unit poses significant operational challenges, because many different employees and contractors must access a vacant apartment during the renovation process; a generic key is more efficient for those purposes and costs less, as it does not require the purchase of unique locksets for each vacant unit. Nonetheless, the current practice poses an unacceptable risk of facilitating unauthorized occupancy and even criminal conduct in vacant units, particularly in light of the absence of regular apartment inspections.

3. Resident Involvement

While NYCHA also has a Resident Watch program that is empowered to patrol and report suspected unlawful activity, NYCHA should more actively and effectively engage this program to encourage the reporting of suspected trespassing in vacant units.

In accordance with NYCHA's Standard Procedure,³⁸ NYCHA's Resident Watch program permits residents to opt in and create their own Resident Watch group at their development, which is led by a Resident Watch Supervisor (a paid role for a NYCHA resident). Currently, there is an active Resident Watch at over 100 NYCHA developments. The Resident Watch Unit of NYCHA's Office of Safety and Security oversees the Resident Watch program. The Resident Watch's duties include conducting patrols—which are not 24/7 and do not always cover an entire development—and reporting suspected unlawful activity on the Resident Watch's Quality of Life ("QOL") form, which it submits weekly to the Resident Watch Unit. The Resident Watch Unit responds to said reports and coordinates with other NYCHA departments, as necessary.

Notwithstanding these existing responsibilities, NYCHA's Standard Procedure does not explicitly state (1) that the Resident Watch Supervisor should report suspected trespassing in vacant units to Property Management immediately or (2) that Property Management should respond to such reports by the Resident Watch Supervisor by submitting the requisite forms to begin the reclamation investigation process within a reasonable time. NYCHA records further indicate that current Resident Watch participants are not reporting unauthorized occupancy in their

³⁸ N.Y.C. Housing Auth., Standard Procedure, 001:17:1, Resident Watch Guidelines.

developments at the same rate that such unauthorized occupancy occurs, as only 28 instances have been reported by Resident Watch from 2022 to 2025, despite over 500 apartment reclamations occurring during this same period. While the Resident Watch program could never entirely supplant inspections by NYCHA staff, nor does DOI expect it to considering the limited nature of the program (as explained above), NYCHA should revise its Standard Procedure and QOL form to more explicitly and effectively engage Resident Watch and Property Management in the process of identifying and reporting unauthorized occupancy in the areas they patrol. Resident Watch has an intimate knowledge of, interest in, and—with better guidance—ability to identify and report such issues in their developments.

IV. Recommendations

1. The Authority should edit Standard Procedure, 040:22:2, Apartment Turnover, Monthly Building, and Other Maintenance Inspections, to require that Property Management conduct monthly inspections (e.g., check the windows and door locks, check for signs of unauthorized occupants [personal belongings, waste]) in vacant apartments that are *not* ready for rental—i.e., units that have been vacated by the tenant of record and are not the subject of a legal dispute, and thus can be inspected by NYCHA. During those inspections, Property Management should secure vacant apartments, ensuring operational window and door locks, to prevent trespassing. If Property Management discovers that there is/are (an) unauthorized individual(s) during an inspection, the Property Management employee should immediately (no later than 72 hours after discovery) make a report to NYCHA’s Law Department. **NYCHA accepts. NYCHA, however, states that it will need approximately one year to implement this recommendation, as NYCHA Information Technology will need to create new auto-generated work orders for these inspections.**
2. NYCHA should evaluate the feasibility of alternative locksets or security technologies, including electronic locks and keys. While studying these alternatives, NYCHA should edit Standard Procedure, 040:22:2, Apartment Turnover, Monthly Building, and Other Maintenance Inspections, to require that developments have multiple (a minimum of two or three, depending on the quantity of vacancies at a development) versions of move-out cylinders (and their related keys) to use on a rotating basis. This will reduce the number of apartments within a development that can be accessed by a single key. No two developments should use the same versions of keys. If NYCHA determines that

an alternative lockset is feasible, then NYCHA should update the aforementioned Standard Procedure accordingly. **NYCHA accepts.**

3. The Authority should edit Standard Procedure, 001:17:1, Resident Watch Guidelines, to require that Resident Watch volunteers report to the Resident Watch Supervisor any suspected unauthorized inhabitants or illegal activity in a vacant apartment. The Resident Watch Supervisor should (1) inform Property Management of any such discoveries by the end of their shift and (2) include any such reports on their Quality of Life form. The Resident Watch should not take any action regarding these individuals other than reporting such discoveries to Property Management. NYCHA should also train Resident Watch related to this requirement. **NYCHA accepts. NYCHA, however, states that it will need approximately six months to a year to implement the portion of this recommendation pertaining to the Quality of Life form, as NYCHA Information Technology will need to make an enhancement to said form.**
4. Upon receipt of such a report from the Resident Watch Supervisor, as described in recommendation 3 above, Property Management should immediately seek to confirm the information and, if verified, immediately (no later than 72 hours after discovery) make a report to NYCHA's Law Department. **NYCHA accepts.**
5. If/when the Authority receives additional funding for refurbishment of vacant apartments, NYCHA should deploy that funding so as to reduce the period of time necessary to complete refurbishment. **NYCHA accepts, subject to funding.**

V. Conclusion

NYCHA's vacant units have increased in recent years—from approximately 2,840 vacancies in January 2022 to approximately 6,740 vacancies as of May 2025—and the average duration is now approximately one year. While the quantity and length of these vacancies are influenced by a variety of factors, many of which are difficult to control for both time and cost reasons beyond NYCHA's control, NYCHA's policies related to true vacancies—particularly the Authority's inspection and lock policies—need improvement.

While NYCHA has made some improvements, including with respect to its centralized reporting and reclamation practices and apartment turnover timeline, NYCHA's current security procedures (i.e., inspections and locks) for vacant apartments must be revised to better protect the NYCHA community from the risk of trespassing. Therefore, it is imperative that NYCHA implement further changes, including DOI's recommendations, to ensure that vacant apartments are free of trespassing and inaccessible to unauthorized occupants and that these units are prepared for rental as soon as possible.