

“Get Ahead of Lead” October 2025 Bulletin

Dear Property Owners,

Furthering our commitment to providing property owners information on their obligations under the law, the Department of Housing Preservation and Development (HPD) will be publishing a series of quarterly bulletins online and via email. Each bulletin will highlight one aspect of the law and is not meant to comprehensively cover all laws and rules that apply. Visit the [HPD website](#) to read this bulletin and past bulletins in other languages.

This publication is intended for informational purposes only and is not intended as legal advice. This information is not a complete or final statement of all the duties of owners and tenants regarding laws and rules relating to housing in New York City.

Local Law 123 - New Child Residency Provision

The deadline of August 9th, 2025 has passed to have all dwelling units and common areas of a building built prior to 1960 tested for lead-based paint. This requirement also applies to rental units in buildings built between 1960 and 1978 if the owner is aware of lead-based paint being present in the building. As an owner, you should be aware of which units in your building have lead-based paint and where the lead-based paint surfaces are. If you have not received a [Lead-Free Exemption](#) from HPD based on your testing for an individual unit in the building (all negative tests), you are strongly encouraged to do so. If you are interested in seeking funding for lead-based paint abatement, you may qualify through the [Lead Hazard Reduction and Healthy Homes Program - HPD](#).

[Download the Local Law 31 XRF Testing Requirement FAQ](#) for even more details on Local Law 31 or watch our [Required Lead-Based Paint Testing for All Rental Units in NYC](#) webinar on YouTube.

Child Under Six

Property owners should also be aware of which occupied apartments have a child under six, based on the [Annual Notice](#) that the owner is required to send every January. In addition to the annual investigation that is required for those units, there are new requirements for a more significant lead-based paint abatement activity. The new requirements mimic the requirements related to the work that an owner has to complete upon turnover of a unit.

When a child under the age of six either (a) resided in a unit as of January 1,

2025, or (b) moves in an occupied unit after January 1, 2025, owners are legally mandated to take following actions:

- I. remediate all lead-based paint hazards and any underlying defects, when such underlying defects exist;
- II. make all bare floors, windowsills, and window wells in the dwelling unit smooth and cleanable;
- III. provide for the removal or permanent covering of all lead-based paint on all friction surfaces on all doors and door frames; and
- IV. provide for the removal or permanent covering of all lead-based paint on all friction surfaces on all windows or provide for the installation of replacement window channels or slides on all lead-based painted friction surfaces on all windows.

When must owners perform this work?

Upon the earliest of

- I. Turnover of any dwelling unit in a multiple dwelling erected prior to January 1, 1960; or
- II. By July 1, 2027, for any unit where a child under six resides as of January 1, 2025; or
- III. Within 3 years after a child under six begins to reside in a unit (if after January 1, 2025)

Is tenant relocation required?

It depends on the circumstances of the work. Be advised that Ad. Code § 27–2056.11(a)(1) requires that an owner “... shall provide for temporary relocation ... of the occupants of a dwelling or dwelling unit to appropriate housing when work cannot be performed safely.” HPD Rule 28 RCNY §11-06(g)(1)(ix)(E)(a) further requires, “An owner must request that an occupant temporarily relocate from a unit pending completion of work where it appears that work cannot be performed safely with occupants in residence.”

If tenant relocation is necessary, does the owner need to provide for or financially support the relocation?

Yes. Per Ad. Code § 27–2056.11(a)(1), when tenant relocation is required, the owner “... shall provide for temporary relocation ... of the occupants of a dwelling or dwelling unit to appropriate housing ...” HPD Rule 28 RCNY §11-06(g)(1)(ix)(E)(a) further requires, “Such owner must offer a suitable, decent, safe and similarly accessible dwelling unit that does not have lead-based paint hazards to such occupants for temporary relocation.”

What happens if the tenant refuses to relocate to perform the work needed?

The property owner must document how they demonstrated good faith efforts to perform the required work and the tenant’s refusal to relocate, in the event that HPD audits your lead-based paint records.

What types of records do I need to keep to be in compliance?

You must keep all records of your attempts to schedule this work (especially if the work is not completed) and of any work done (including proof about use of

the proper certified vendors) for a minimum of 10 years.

Enforcement and Violations

Failure to comply with both the work requirements and record-keeping requirements can result in Class C immediately hazardous violations.

If you have additional questions, visit [Lead-Based Paint - HPD](#) or contact 212-863-5501 for more Lead Information.

National lead Poisoning Prevention Week 2025

Have questions about lead-based paint?

We may be in your neighborhood at the end of October, so look out for the HPD outreach van.

The Department of Housing Preservation, in collaboration with the Department of Health and Mental Hygiene is proud to host National Lead Poisoning Prevention Week from October 18th – 25th 2025. This annual campaign is dedicated to raising awareness about the dangers of lead-based paint exposure and providing families with the resources needed to ensure a safe, healthy and lead-free home.

Together, we are building on years of success and looking forward to another impactful week of education, engagement and giveaways. We look forward to seeing you in your community. For more information on event locations and times visit [Lead Poisoning Prevention - NYC Health](#).

If you can't join us in person, we will be conducting webinars during the same week. Check out for more information in our next Special Bulletin.