DELIVERING ON COMMITMENT:

THE 2025 NYC LEAD COMPLIANCE REPORT

Letter from Mayor Adams

Dear Fellow New Yorkers:

New York City is committed to ensuring that every child and family can live, learn, and grow free from harm. Yet, too many still face the hidden danger of lead exposure in their homes — a risk that persists due to our city's aging housing stock, older infrastructure, and the continued presence of outdated lead-based materials.

Our city has a long history of confronting this challenge with action, beginning with being one of the first cities in the nation to ban lead-based paint in the 1960s, which was later reinforced by Local Law 1 of 2004 — one of the most rigorous lead laws in the country. Building on that foundation, LeadFreeNYC was launched in 2019 as the next major step in accelerating progress. Since then, we've advanced stronger laws, new operational strategies, and impactful programs to better protect New Yorkers — especially our youngest — from preventable exposure. This report reflects on that progress, evaluates how current programs are performing, and helps chart the path forward to eliminate lead risk entirely.

Under this administration, we've made it our mission to safeguard the most vulnerable. Across agencies — from health and housing to education and infrastructure — we are acting decisively and collaboratively. Our childhood lead poisoning rate now stands at 20.4 per 1,000 tested children under age six. While this is one of the lowest rates among major U.S. cities, even one child exposed to lead poisoning is one too many.

That's why we've invested $757 million in the current capital plan to tackle lead hazards at NYCHA, which includes expanding targeted inspections and outreach, enforcing thousands of violations, and ordering abatement of thousands of homes. We've replaced over 6,200 private lead service lines to protect drinking water and reached tens of thousands of residents through multilingual education and community engagement.

This report — developed by the Mayor's Office of Risk Management and Compliance — marks the first time New York City is publishing detailed, cross-agency lead prevention metrics outside of legally required annual reports. It's an honest assessment of where we've made progress — and where we still have work to do.

Together, through sustained investment, accountability, and community partnership, we can build a safer, healthier, and more just New York City for all.

Eric Adams
Mayor, City of New York

Letter from the Citywide Lead Compliance Officer

Over the past two years, I've had the privilege of serving as New York City's Citywide Lead Compliance Officer. In that time, I've seen firsthand the strength of our multi-agency efforts, the dedication of public health professionals, and the collective progress our city has made toward a lead-free future.

New York City continues to lead the nation in childhood lead testing, with more than 228,600 children tested in 2024 and one of the lowest rates of elevated blood lead levels we've ever recorded. But as scientific understanding evolves and federal standards grow more stringent, we face new challenges, not because the threat has grown, but because our expectations for public health are rightly rising. This year's report, *Delivering on Commitment: The 2025 NYC Lead Compliance Report*, highlights our ongoing work to advance compliance across all agencies.

This report highlights the City's continued dedicated commitment to protecting New Yorkers from lead exposure. It also underscores the importance of partnership: between government agencies, with property owners and tenants, and above all, with the public. Not one of these groups can create a lead-free New York City on their own; we must work together.

Eliminating lead hazards requires trust, communication, and shared responsibility. With your partnership, we will continue this momentum and continue to work with relentless urgency so that every child grows up in a safe, healthy environment.

Sincerely,

Jean-Claude LeBec
Citywide Lead Compliance Officer
Mayor's Office of Risk Management and Compliance

Executive Summary

As a safe and thriving city, it is essential that we maintain infrastructure that protects the health and well-being of all New Yorkers. One major way to do that is through a proactive and aggressive approach to remediating lead. Since the 1960s, when New York City became the first major U.S. city to ban the sale and use of lead-based paint, we have made significant progress in reducing lead exposure. Yet the threat remains — especially in homes, as aging infrastructure, deteriorating paint, and environmental and socioeconomic factors persist.

Lead exposure is a national challenge, affecting urban and rural communities alike, but New York City has led the way in crafting comprehensive, forward-looking policies to combat this risk. In 2019, the City launched LeadFreeNYC, a multi-agency initiative building on decades of work to eradicate childhood lead exposure. The plan strengthened enforcement tools, expanded protections in private housing and shelters, prioritized high-risk populations, and laid out clear steps to reduce lead hazards across city-owned properties, consumer products, and soil and water systems. This administration reaffirms that eliminating lead hazards requires a sustained, multidisciplinary effort that remains fundamental to protecting New Yorkers' health.

Since then, New York City has built on that foundation with new investments, local laws, and operational improvements across agencies — from increased enforcement in private housing, to comprehensive inspections in schools and shelters, to major capital commitments at NYCHA. Under the Adams Administration, agencies have continued outreach, improved data coordination, and expanded environmental testing and remediation — all with the goal of protecting our most vulnerable residents and moving closer to a lead-free city.

This report takes stock of that work. It evaluates the progress made since LeadFreeNYC was launched, highlights the initiatives and outcomes that have had the greatest impact, and identifies the operational and policy areas that require continued investment and innovation. As we reflect on what's been accomplished, this report also sets the stage for where we go next — guided by data, public health expertise, and a citywide commitment to ending lead exposure for good.

Since 2022, the Adams Administration has made significant progress in reducing lead exposure and protecting public health, in alignment with the LeadFreeNYC roadmap. Key achievements include:

- **Promoting testing and increased outreach:** DOHMH has monitored the test results of over 228,600 children tested for lead exposure by their health care provider in 2024 and organized over 700 education and outreach events that engaged more than 19,500+ New Yorkers through community campaigns and events.
- **Aggressive enforcement:** HPD increased lead hazard inspections by 20% and violations by 21% over the past year, while launching targeted audits and legal action against noncompliant landlords.
- **Expanded abatement:** HPD and NYCHA collectively abated lead-based paint hazards in thousands of units, with NYCHA removing all lead-based paint from 6,000+ apartments in 2024 alone — a 26% increase from 2023. DOE identified and remediated all classrooms with deteriorated lead paint in 2024.
- **Improved data transparency and oversight:** Agencies, like HPD, DOE, and DSS have expanded audits and inspections in housing, shelters, and schools, and tested over 75% of NYCHA units under the City's stricter standard for lead-based paint.

- **Infrastructure upgrades:** DEP replaced 6,200 lead service lines since 2020 and Mayor Adams expanded a $48M program in 2024 to replace privately-owned lead or galvanized water service lines in low-income Bronx and Queens neighborhoods.
- **Legislative advancements:** The City enacted Local Laws 111, 122, 123, and 127 of 2023, expanding lead-based paint testing, recordkeeping, and abatement requirements, and strengthening audit criteria — further aligning local law with stricter standards to improve compliance in older housing stock.

These efforts reflect the City's commitment to proactive, data-driven, and equitable lead prevention — helping ensure that every New Yorker, regardless of zip code, has access to a safe and healthy home.

LeadFree NYC's Plan (2019) Commitments:	Continued Lead Work Under the Adams Administration (2022–Present):
• Set the nation's strictest lead remediation standards for paint and dust. • Expand lead safety rules to include 1- and 2-family homes. • Refer construction-related lead hazards to DOB for enforcement when the Health Department finds lead exposure risks during construction. • Assign nurses to support children with elevated blood lead levels (EBLLs). • Run ad campaigns encouraging child lead testing, promoting free water test kits, and raising awareness of harmful consumer products like spices, medicines, and powders. • Test and remediate all NYCHA units where lead is suspected. • Proactively test and remove lead hazards in all DHS family shelter units. • Launch a "Lead-Free" home designation after comprehensive testing. • Publish an index of consumer products containing lead and train businesses. • Map and replace private lead service lines, prioritizing low-income homes in replacement efforts. • Reduce soil-based lead exposure in community gardens and surveying all NYCHA playgrounds, covering exposed soil when needed.	• **DOHMH** received reports from health care providers on over 228,600 children tested for lead exposure in 2024. • **HPD** expanded inspection requirements to include one- and two-family homes. • **DOHMH & DOB** continued their task force to refer lead hazards found during construction for enforcement. • **DOHMH** hosted 700+ outreach events and distributed 101,000+ multilingual materials on lead safety in FY24. • **HPD** increased inspections by 20%, issued 21,800+ violations, and performed 722 apartment remediations in FY24. • **HPD** secured $230,000+ in civil penalties from landlords across 17 buildings for noncompliance in FY24. • **DOHMH** continued to assign a dedicated nurse to every child with an EBLL over 5 mcg/dL. • **DEP** replaced 6,200 private lead water service lines between 2020–2024; launched a public map of lead service lines to inform and protect residents; 100% of water test kit requests were fulfilled. • **Citywide** expanded a $48M program to replace privately-owned lead or galvanized water service lines in low-income Bronx and Queens neighborhoods; program helps homeowners save $10,000+ on replacement costs.

LeadFree NYC's Plan (2019) Commitments:	Continued Lead Work Under the Adams Administration (2022–Present):
• Inspect homes where young children spend significant time for lead hazards.	• **Citywide** committed $757 million over 10 years to improve environmental conditions in NYCHA housing. • **NYCHA** tested 75% of 147,000+ units required by the 0.5 mg/cm² standard; 13,000+ lead-positive units abated by March 2025. • **DOE** inspected over 32,000 rooms in 2024; all 218 rooms with lead-based paint were fully remediated. • **DSS/HRA/DHS** tested 1,143 units across 24 City-owned shelters (2021–2024); 100% of 197 lead-positive units were abated. • **Citywide** made legislative advancements to strengthen lead-based paint testing, abatement, recordkeeping, and audit requirements for property owners and city agencies.

This report was developed by the Mayor's Office of Risk Management and Compliance in collaboration with the following New York City agencies responsible for implementing programs to reduce lead exposure risks. The roles of each agency, along with key metrics and focus areas, are outlined in the report and summarized in the chart below to help measure progress, evaluate performance, and identify areas needing further attention.

Agencies	Primary Role in Lead Hazard Prevention	Key Metrics & Focus Areas in Report
DOHMH	Citywide lead surveillance, EBLL case management, Commissioner's Order to Abate (COTA), safe work practice enforcement, public education	EBLL testing data (children & pregnant people), investigations, violations, safe work practices, outreach efforts
HPD	Inspections, emergency repairs for lead-based paint hazards, audits of required records, legal action	Complaints, inspections, violations, emergency repairs, audits, legal interventions
DEP	Oversees water safety, lead service line mapping, and public lead testing programs	Water service line inventory, water testing kit use, service line replacement progress, mapping data
NYCHA	Lead paint testing and abatement in public housing, HUD compliance and progress	X-ray Fluorescence (XRF) testing, visual assessments, abatement progress, Permanent Affordability Commitment Together (PACT) program data
DOE	Lead testing, results, and remediation in schools for lead-based paint and drinking fountain water	Paint inspection/remediation data, water testing results in schools
DSS	Lead inspections and hazard management in DSS-owned buildings	Lead testing and abatement data
DOB	Building code enforcement, oversight of lead-related construction and renovation practices	Lead-safe work practice enforcement
DPR	Testing and mitigation of lead in public park amenities like drinking fountains	Lead fountain testing results and remediation metrics

The following priority areas were identified by the Lead Strategy Working Group led by the Mayor's Office of Risk Management and Compliance in collaboration with City agencies. These findings highlight opportunities to accelerate progress toward full compliance and reduce lead exposure — spanning source mitigation, public cooperation, and operational alignment. Alongside these areas, the chart on the next page highlights targeted recommendations and next steps that serve as a guiding vision for the next phase of the City's lead prevention strategy. As the City enters this new phase, these recommendations are forward-looking and are designed to scale and strengthen the programs and initiative the City is already running. Building on existing successes, the actions below aim to address root causes more directly and move the City closer to the shared goal of eliminating elevated blood lead levels.

Lead Compliance: Major Compliance Priority Areas Identified in the Report

Priority Areas	Key Findings
Source Issues	• Pre-1960s housing stock remains a major source of lead paint exposure. • Aging infrastructure increases risk of lead in water and soil. • Lead hazards in paint and water lines persist in private one- to two-family homes.
Public Cooperation	• Gaps remain in universal blood lead level testing for children under six. • Limited tenant residence access for lead paint inspections and remediation, hindering timely testing and abatement efforts. • Property owner noncompliance with proactive lead safety requirements. • Unsafe construction and renovation practices disturb lead paint and dust.
Operational Alignment	• Expanding program reach and strengthening inspection and abatement capacity could be supported by more strategic resource alignment and workforce planning. • Enhancing data sharing between agencies and programs can create a more unified and effective approach to addressing lead issues. • Modernize city programs to align with Local Laws and regulatory mandates, strengthening compliance and ensuring timely implementation.

Lead Compliance Strategy Recommendations and Next Steps	
1. Prioritize Programs and Resources to Further Target High-Risk Sources	The City will assess ways to further target and scale resources toward the most hazardous lead sources and vulnerable populations and close gaps of noncompliance—beginning with lead-based paint hazards, the most commonly identified cause of elevated blood lead levels in children. Agencies already have strong enforcement and remediation tools, but their impact is limited without the workforce needed to fully scale these programs. This could allow agencies, like HPD, to shift to a more proactive abatement approach and to further expand inspections and remediation in older housing stock and aging infrastructure.
2. Strengthen Cross Agency Data Integration and Transparency	Begin to design a centralized, real-time platform to integrate lead-related data from DOHMH, HPD, DEP, DOE, NYCHA, and DOB. This platform could track blood lead levels, inspections, violations, and remediation progress; include public-facing tools; and align agency standards. Improved data sharing offers opportunities to reduce delays, use resources more effectively, avoid agency overlap, and strengthen accountability.
3. Modernize and Align Local Laws to Improve Compliance	Revisit outdated laws (e.g., Local Law 39 of 2021) to close gaps and remove barriers that delay remediation, especially in schools. Consider new legislation that would require private property owners to replace lead service lines. Standardize safety requirements across public, charter, and private schools. Finally, educating and preparing newly elected officials and city council members on lead hazards and the need for local law compliance support is critical to future progress.
4. Expand Resident-Friendly Inspection Access and Engagement	Create more opportunities to offer flexible inspection schedules (evenings/weekends) and improve customer service. Expand education campaigns with multilingual outreach materials, tenant rights resources, and public messaging to increase blood lead testing and awareness in high-risk areas. Build on past DOHMH campaigns and partner with doctors, daycares, and community groups to reach families.
5. Launch Targeted Public Awareness Campaigns in High-Risk Areas	Building on DOHMH's past successful campaigns, the City can relaunch and expand public messaging to encourage regular childhood blood lead testing and to highlight lead risks—especially in neighborhoods and boroughs with the highest EBLL rates. Using subway ads, local media, and digital tools, these campaigns should emphasize the health impact of lead and publicize city services available to help.

Overview

PURPOSE OF THE REPORT:

This report builds upon the foundation established by LeadFree NYC, which was laid out in 2019, the City's comprehensive initiative to eliminate lead exposure and prevent lead poisoning among residents. LeadFree NYC was the City's most recent commitment to an aggressive set of policies and operations aimed at facilitating a multifaceted plan that tackled lead hazards in housing, consumer products, water, and soil — prioritizing protections for children under six, pregnant individuals, and vulnerable communities. It established a roadmap to ensure the safety and well-being of New Yorkers by addressing lead risks at their source.

The purpose of this report is to evaluate the progress made since LeadFree NYC by assessing the City's compliance with lead rules, regulations, and public commitments. It seeks to identify areas of success, highlight real-world challenges with compliance, and propose guiding strategies to address areas for improvement. It is the first time that cross-agency lead poisoning prevention metrics are being published by the City of New York outside of legally mandated annual reporting. By building on the original goals of LeadFree NYC, this report serves as a tool to guide ongoing efforts that can mitigate lead risks and ensure a healthier future for all residents.

LeadFree NYC's original initiatives focused on key areas of concern:

The primary objective of LeadFree NYC was to further reduce elevated blood lead levels in children. The City aimed to strengthen efforts to prevent childhood lead poisoning and ensure long-term public health improvements through targeted interventions, testing, and other strategies. Expanding resources for intervention and follow-up care, providing free blood lead testing for uninsured children, and enhancing outreach to high-risk communities were central to these efforts. The program also strengthened coordination across agencies and institutions to better serve affected families, promote compliance with childhood blood lead testing requirements, and promote awareness of lead hazard risks and resources available to New Yorkers.

Another critical component of LeadFree NYC was expanding efforts to **address lead-based paint hazards**, particularly in older housing stock where deteriorating paint poses significant risks. The initiative included lowering the threshold definitions for lead-based paint and lead-contaminated dust to create stricter safety standards, and supported the efforts to extend Local Law 1 protections to single-family homes with young children. Proactive measures included auditing landlord compliance against New York City lead rules, enhancing inspection protocols, and investing resources to abate lead-based paint in New York City Housing Authority (NYCHA) units and family shelters. Public outreach campaigns encouraged reporting of unsafe conditions while funding supported landlords in repairing units where there were lead hazards.

LeadFree NYC also addressed **lead's risks in consumer products** such as imported foods, spices, remedies, cosmetics, and cultural items. The initiative enabled the Health Department to expand its monitoring and enforcement programs that tracks unsafe products, and requires shop owners to remove hazardous products from store shelves or face monetary penalties and participate in required training on identifying these items to avoid future sales. Investments in

inspections and public education campaigns aimed to raise awareness and protect New York City communities from these hidden hazards.

Finally, LeadFree NYC focused on **educating homeowners about the health risks of Lead Service Lines (LSLs) and the options available to them to replace these lines.** Efforts included responding promptly to elevated lead levels in water, promoting the availability of free water testing kits, and publishing a comprehensive map of lead service lines. The City also invested in research and ongoing infrastructure improvements to ensure safe drinking water for all residents.

The report below delves deeper into the actual operations of these initiatives, describing their implementation and the key performance indicators used to measure their impact. For a guide to the acronyms and key definitions used throughout this document, please reference Table 1 in the Appendices at the end of this document.

The Current State of Lead Risk in New York City

Lead exposure is a nationwide concern, affecting urban and rural communities alike due to aging infrastructure, deteriorating lead-based paint, and socioeconomic disparities. As the most populous metropolitan area in the country, New York City faces heightened risks of lead exposure due to its aging housing stock and dense population. Annually, health care providers in New York City conduct more lead tests among children than any other U.S. city, with more than 228,600 children under six tested in 2024 alone. New York City also has one of the highest testing rates in the nation and state — where an estimated 80% of New York City children are tested at least once before their third birthday. The following section details the people and places where lead poisoning risks persist today.

PEOPLE AFFECTED

Children under six and pregnant individuals remain the most at-risk of serious health problems as a result of lead exposure. The city has robust intervention strategies for children and pregnant people identified with an EBLL, which is later discussed in this report.

EBLL refers to a confirmed concentration of lead in the blood that is equal to or greater than 3.5 micrograms per deciliter (µg/dL), as measured by a venous blood draw. The term µg/dL stands for micrograms of lead per deciliter of blood—and is the standard unit used to measure blood lead levels. This threshold is used to identify children with higher lead levels compared to most other children. According to the latest guidance from the U.S. Department of Health and Human Services (HHS), the Centers for Disease Control and Prevention (CDC), and the U.S. Department of Housing and Urban Development (HUD), it is recommended that children with confirmed blood lead levels of 3.5 or higher require prompt action and environmental investigation.[1]

Children under six: For children, EBLLs are especially concerning due to their heightened vulnerability to lead's harmful effects. Any degree of lead exposure presents a risk in children. Young children are more likely to ingest lead through hand-to-mouth activities, especially if they live in or frequently visit places with peeling lead-based paint or lead-contaminated dust, soil, water, or consumer products. Their developing brains and nervous systems are particularly susceptible to damage. Lead exposure in children can result in irreversible cognitive

STORIES FROM THE FIELD

A pregnant mother living in Queens enjoyed tea made with imported spices her family brought from abroad. Unbeknownst to her, the turmeric she used daily contained high levels of lead. During a routine prenatal visit, her doctor discovered elevated lead levels in her blood, putting both her health and her fetus's development at risk. An investigation by the NYC Health Department found that the tea she consumed used a lead-based paint pigment to give the tea a bright yellow color. The product was immediately removed from her diet, and her blood lead levels were closely monitored until they dropped below the 5 µg/dL threshold.

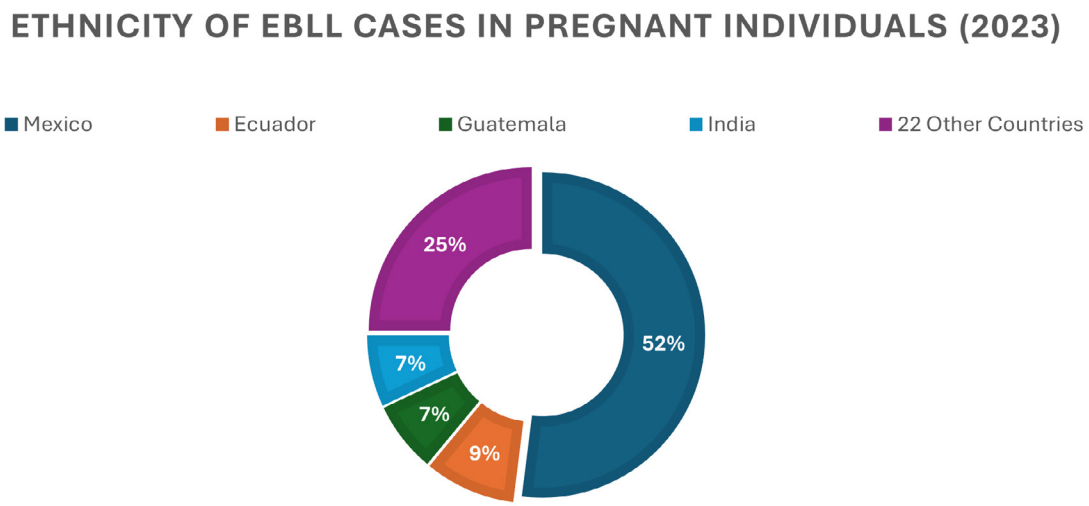
1 See CDC Updates Blood Lead Reference Value

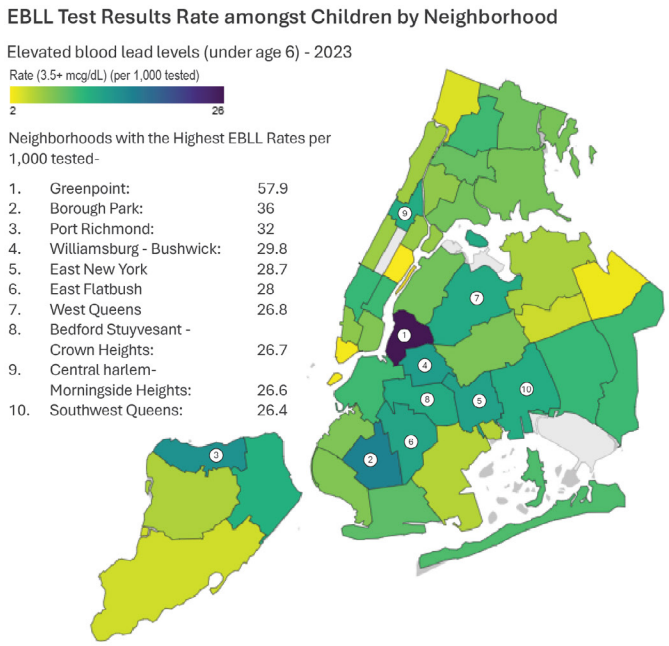
impairments, developmental delays, behavioral issues, and long-term health problems.

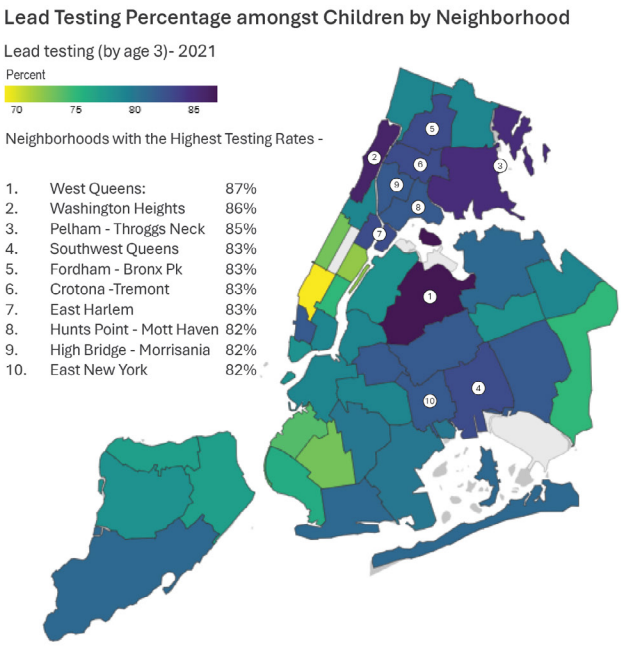
Pregnant individuals: Exposure can harm both the pregnant person and the developing fetus. In 2024, more than 285 people with confirmed pregnancies had EBLLs of 5 µg/dL or greater in New York City.

The primary source of lead poisoning in pregnant individuals is not lead paint. Instead, exposure is often linked to imported consumer products, commonly brought in from the family's country of origin. Some cases have also been associated with imported products used in traditional or alternative health practices, even when not tied to the family's cultural background.

Of the 285 people mentioned above, 86% were foreign-born from 26 different countries, with 75% being from just four countries (52% from Mexico, 9% from Ecuador, 7% from Guatemala, and 7% from India).







Source: New York City Bureau of Vital Statistics; New York City Healthy Homes Program

PLACES AFFECTED

The maps above show neighborhood-level patterns in blood lead testing and elevated blood lead levels (EBLLs). The right-hand map shows the percentage of children tested for lead poisoning before the age of three, calculated by dividing the number of children born in New York City who were tested before age three by the total number of children turning three years old in a given year in that area. The left-hand map shows the rates of children with EBLL, calculated by dividing the number of children tested in a given year with blood lead levels of 3.5 µg/dL or greater with the total number of tested children in that area, expressed per 1,000 tested.[2] They provide critical insights into EBLL rates and blood lead testing patterns across New York City neighborhoods and highlight areas where more cases of lead exposure are being detected. Neighborhoods were determined using the United Hospital Fund (UHF) neighborhood boundaries, which group zip codes.[3] Aggregating data at this level allows for meaningful comparisons across neighborhoods of different sizes helping to identify communities most at risk.

Places with high prevalence of EBLL cases: Neighborhoods facing disproportionately high risk of lead poisoning are those with older housing stock. New York City's childhood lead testing

2 This data is sourced from the NYC Health Department's Environment & Health (EH) Data Portal.

3 United Hospital Fund (UHF) neighborhoods are geographic areas in NYC created in the 1980s by the NYC Health Department, the United Hospital Fund, and other city agencies to support health research. These neighborhoods group ZIP codes, which are commonly found in health data and surveys, making them useful for analysis. Aggregating data at the UHF level protects privacy while enabling meaningful comparisons across neighborhoods. The most common framework is UHF42, which divides the city into 42 neighborhoods, though UHF34 is sometimes used to increase statistical power by combining certain areas.

rates are among the highest in the nation, with many neighborhoods reaching coverage levels above 80% by age three. With some exceptions, neighborhoods with higher rates of elevated blood lead levels (EBLLs) also tend to have high testing rates, indicating that most children at risk are identified timely and connected to appropriate services.

Places with high incidence of lead paint violations: The chart below describes the proportion of lead-based paint violations by borough and lists the neighborhoods with high violations. The neighborhoods below regularly appear in New York City's Department of Housing Preservation and Development (HPD) Lead Based Paint Annual Report to the City Council and are listed here for the City to consider hot spots that need the most immediate attention.[4] Neighborhoods in **red** also fall within the top ten New York City neighborhoods for EBLL among children, based on New York City's Department of Health and Mental Hygiene (DOHMH) data. Of the 19 neighborhoods with high lead-based paint violations over the years across the boroughs, 11 of the neighborhoods listed below have high rates of EBLL amongst children. Neighborhoods not highlighted may have higher rates of childhood lead poisoning than what is reported as a result of limited blood lead level testing in their areas. These neighborhoods may be candidates for new public information campaigns.

Hot Spots: Boroughs and Neighborhoods with High Lead Paint Violations*

*Red indicates a neighborhood that has a high prevalence of EBLL amongst 1,000 children tested (rate of >10)

Percentage of New York City's Lead Paint Violation by Borough	2022	2023	2024
Bronx • Tremont, West Bronx • Williamsbridge, Norwood, Allerton • Kingsbridge, Bedford Park, Fordham, University Heights	41%	42%	44%
Brooklyn • Flatbush • Midwood • Brownsville • Prospect Lefferts Garden	34%	33%	29%
Manhattan • Hamilton Heights • Washington Heights	14%	14%	15%
Queens • Jackson Heights • Ridgewood • Elmhurst	10%	11%	12%
Staten Island • St. George	1%	1%	1%

4 See HPD's Lead Based paint Annual Report FY2024

It is important to note that HPD and DOHMH data do not perfectly overlap, due to differences in their data collection methods and jurisdiction. HPD data is primarily driven by tenant complaints, often in high-density, multifamily housing — often missing lower-density neighborhoods where tenants may be less likely or able to report issues. In contrast, DOHMH's data is informed by childhood blood lead testing and often captures risks in more private 1- to 2-family homes, households with recent travel or foreign-born occupants, and areas where exposure may not be tied to complaints but to imported consumer goods, home remedies, or other sources. When used together, HPD and DOHMH datasets provide a more comprehensive picture of lead exposure risk across the city.

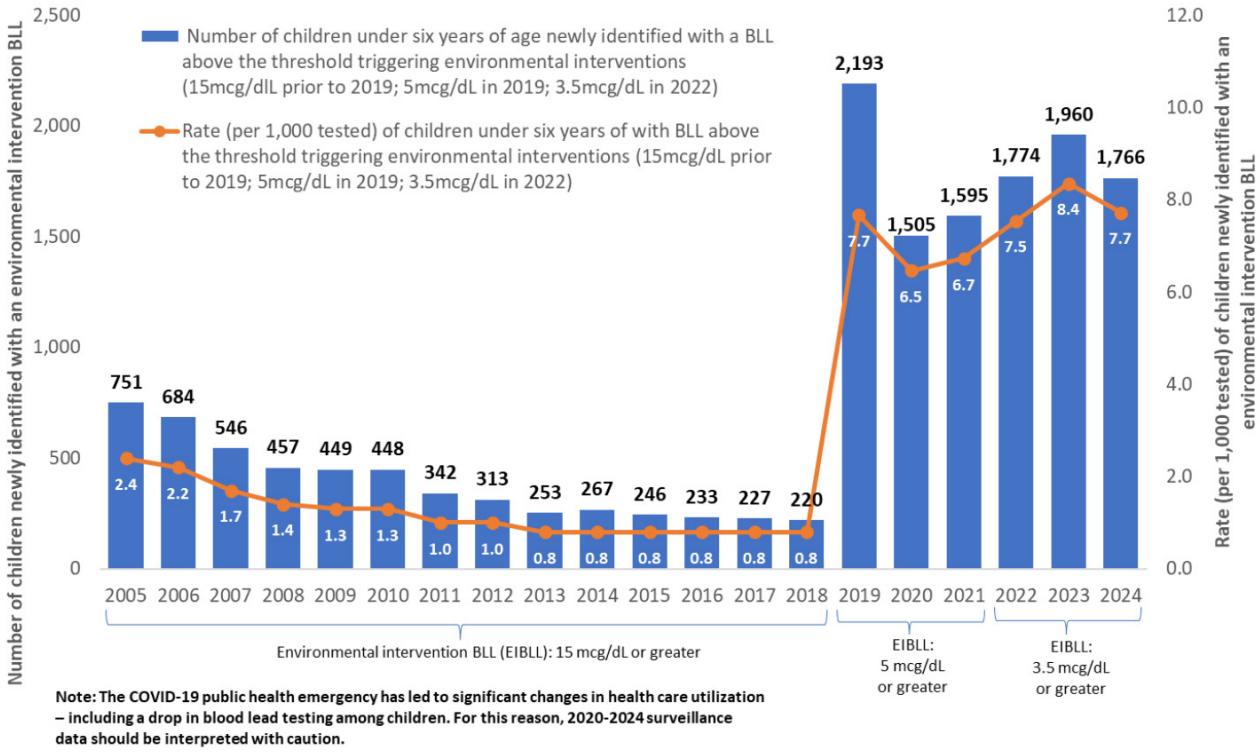
Overall, the increase in remediations citywide is a positive development, reflecting better efforts to mitigate lead-based paint risks. The lower number of remediations following COTA non-compliance indicates opportunities to support property owners in fulfilling their responsibilities and ensuring that lead-based paint hazards are addressed.

DATA TRENDS OVER TIME

New York City has long been a national leader of protective policies to reduce childhood lead exposure. In 1960, the New York City Board of Health made New York City one of the first jurisdictions to prohibit lead paint in residential buildings. The threshold for conducting an environmental investigation based on an EBLL has decreased from venous 60 µg/dL in 1970 to 30 µg/dL in 1981 to 20 µg/dL in 1992 to 5 µg/dL in 2019 and lastly to 3.5 µg/dL since October 2021. Since the enactment of Local Law 1 of 2004, New York City has seen a significant and consistent decline in children under six who have blood lead levels of 5 µg/dL or higher.

As testing standards become more protective with stricter standards, more cases of EBLLs are being identified and DOHMH is able to intervene. The chart below illustrates how the number of children with an EBLL has increased with the lower threshold for detecting an EBLL, as seen in the jump from 2018 to 2019.

Figure 2. The number and rate of New York City children under 6 years of age newly identified with a blood lead level (BLL) at or above the environmental intervention threshold



Note: The COVID-19 public health emergency has led to significant changes in health care utilization – including a drop in blood lead testing among children. For this reason, 2020-2024 surveillance data should be interpreted with caution.

Source: New York City Department of Health and Mental Hygiene Childhood Blood Lead Registry.

Eliminating Lead Poisoning From New York City

COMPLIANCE AND ENFORCEMENT TOOLS AVAILABLE TO THE CITY:

New York City employs several critical tools to combat lead poisoning and ensure compliance with safety standards. Below are a sample of some of the most impactful tools utilized by City agencies today.

All elevated blood lead tests taken at any doctors' office or laboratory in the city are routed to **the Department of Health and Mental Hygiene (DOHMH), which serves as the central hub for investigating lead poisoning cases**. DOHMH uses these reports to trigger environmental investigations and coordinate follow-up care, ensuring rapid response to protect vulnerable populations, and prioritizing children under six.

The **Commissioner's Order to Abate (COTA) is a powerful enforcement tool used by DOHMH to mandate the remediation of lead-based paint hazards**. When lead hazards are identified in a property, DOHMH issues a COTA, requiring property owners to hire certified lead abatement professionals and perform the necessary repairs. This ensures that lead hazards are addressed promptly and safely, preventing further exposure.

The Department of Housing Preservation and Development (HPD) plays a vital role in **enforcing compliance through its inspection and violation system**. HPD conducts inspections to identify lead hazards and issues violations when landlords fail to meet safety requirements. This process holds property owners accountable and ensures that lead hazards are identified and addressed in a time-limited manner.

HPD's **Emergency Repair Program (ERP) acts as a critical safety net** when landlords fail to comply with a COTA or address violations. Under this program, HPD performs the necessary lead hazard remediation using its own contractors. The costs of these repairs are then billed to the property owner, ensuring that residents are protected even when landlords neglect their responsibilities.

In 2019**, following a federal lawsuit, the City and NYCHA entered the HUD agreement, detailing substantial commitments relating to lead compliance** in NYCHA properties. The HUD agreement installed a Federal Monitor, three new oversight departments, a top-to-bottom reorganization of the Authority, and new performance metrics across six focus areas (lead-based paint, mold/leaks, heat, elevators, pests/waste, and inspections).

In the current capital commitment plan, **the Adams Administration has committed $3.96 billion over 10 years to support a range of NYCHA capital needs,** including but not limited to lead-based paint abatement. In addition to meeting the obligations outlined under the HUD agreement, NYCHA and the City have pursued broader reforms and investments that have improved environmental conditions across NYCHA properties.

Together, these tools create a robust framework for addressing lead hazards, protecting public health, and ensuring that New York City remains vigilant in its fight against lead poisoning.

Oversight Authorities

No city can go at it alone, federal, state, and local agencies, each with distinct roles, share the responsibility for setting standards and enforcing lead regulations. Their collaborative efforts ensure that lead hazards are identified, mitigated, and prevented across various domains. (City agencies directly involved in lead poisoning prevention efforts will be discussed in the compliance report section that follows).

NEW YORK STATE AGENCIES

The New York State Department of Health plays a key role in lead oversight within the state. It regulates the operation, design, and quality of public water supplies in collaboration with local health departments, ensuring the safety of drinking water. Additionally, the department oversees lead screening programs for children, requiring healthcare providers to conduct testing and follow-up for EBLLs. It also mandates testing of potable water in public schools for lead contamination to safeguard children's health.

The New York State Attorney General's Office has actively fought lead paint hazards by securing settlements and taking legal action against noncompliant landlords in New York City and across the state. In addition to enforcement, the office has led coalitions for stronger federal protections and advanced public education and policy reforms to better protect children and families from lead exposure.

FEDERAL AGENCIES

At the federal level, multiple agencies have traditionally contributed to lead oversight:

Center for Disease Control and Prevention (CDC): The CDC identifies the blood lead reference value to help healthcare providers identify children with elevated blood lead levels and recommends public health actions based on those findings. Historically, the CDC also supported state and local public health departments by funding surveillance and prevention programs aimed at reducing lead exposure.

US Department of Housing and Urban Development (HUD): HUD focuses on lead hazards in HUD-funded residential buildings, enforcing regulations designed to protect families, especially in low-income housing. Its efforts include establishing safety protocols for lead-based paint and ensuring compliance through inspections and remediation requirements.

US Environmental Protection Agency (EPA): The EPA sets national requirements and regulations for testing water systems and replacing lead service lines, crucial steps in addressing lead contamination in water supplies. It also establishes standards for certain lead-based paint hazards, providing a baseline for safety in residential and commercial buildings.

Agency Performance Report

The report below compiles agency data on their key roles and responsibilities, drawn from local laws and regulatory requirements, to evaluate their performance in meeting compliance obligations. To assess these performance indicators, the report utilizes Fiscal Years (FY) as a consistent metric, allowing for year-over-year comparisons that help track agency progress and identify trends over time.

The data in this report primarily reflects 2024 data, with some variation across agencies due to different reporting cycles. In certain cases, agencies were able to provide current 2025 data, while others rely on finalized figures from 2023 or earlier. These differences reflect the natural lag that comes with publishing and annual reporting processes.

Due to the many factors (progressively stricter legislation) and the stakeholders involved (the behavior of both tenants and property owners), City agencies do not always have control over the compliance with regulations for which they are responsible. For example, HPD cannot mandate tenants to give them access to conduct inspections, and DOHMH cannot ensure that every child under six in New York City is tested for lead.

The intention of this document is to provide a detailed overview while spreading awareness of the ongoing lead mitigation efforts among City agencies. The compliance reports below aim to illustrate lead metrics within the context of agency operations and the current public health landscape, helping to inform strategies to continue moving the needle against lead poisoning.

DEPARTMENT OF HEALTH AND MENTAL HYGIENE

DOHMH by the numbers in 2024

- 228,600 test results for children under age 6 were reported by their health care providers and monitored by DOHMH.
- 4,655 children tested with EBLL (rate of 20.4 per 1,000 tested), and all cases triggered an environmental investigation, including home inspection.
- 285 pregnant individuals tested with EBLL, and all cases were followed up with an investigation.
- 2,127 unsafe work complaints triggered inspections, resulting in 463 Notice of Violations.
- 3-5 buildings inspected per month by DOB-DOHMH joint taskforce.
- 101,000 educational materials distributed.

The Department of Health and Mental Hygiene (DOHMH) protects public health by addressing lead exposure through a comprehensive set of responsibilities. It monitors and reports results of blood lead testing and addresses EBLLs in children, pregnant individuals, as well as occupational workers by conducting investigations to identify possible sources of exposure.

Healthcare providers are mandated by New York State law to test children's blood lead levels at ages one and two.[5] Despite this requirement, not all children are tested at these ages, due to various reasons, including parental decisions or a lack of awareness. If a child's test result indicates an EBLL, DOHMH is required to investigate and implement appropriate enforcement or other intervention measures.

EBLL testing among children and pregnant people

Tracking and investigating EBLLs in children and pregnant individuals are a cornerstone of DOHMH's efforts to safeguard public health and prevent lead poisoning. DOHMH conducts investigations for those with newly identified confirmed EBLLs at or above 3.5 µg/dL to identify and address sources of exposure. For children newly identified with confirmed EBLLs at or above 5 mcg/dL, DOHMH assigns a care coordination nurse to monitor their blood lead levels and coordinate ongoing care, promoting thorough follow-up and support. A care coordination nurse provides support and consultation to the health care provider as well. For pregnant individuals with confirmed EBLLs, DOHMH conducts a risk assessment to identify and eliminate possible sources of lead exposure.

5 In New York State, health care providers are required by law to test all children at or around age 1 and age 2, and to assess and test those at risk of lead poisoning starting at age 6 months up to age 6.

Blood Lead Level testing among Children & Pregnant People	
Indicators	**Metrics**
Blood testing for lead poisoning in children under 3.	In 2024, 86,000 children, who were born in 2021, were identified as requiring testing according to NY State law, the same number identified in 2023 for the 2020 birth cohort.[6] An estimated 66,000 (76%) were tested for lead poisoning at least once. This represents a 3% decrease from 2023.
Blood testing for lead poisoning in children under 6.	In 2024, 228,600 children under 6 years of age were tested at least once to determine blood lead levels. This represents a 2.3% decrease from 2023, when 234,000 children under 6 years of age were tested.
Elevated blood lead levels in children under 6.	Of the 228,600 children tested in 2024, 4,655 (20.4 per 1,000 tested) had a blood lead level of 3.5 mcg/dL or greater, an 8% decline compared to 2023 when there were 5,078 children with EBLLs.
Rate of children with elevated blood lead levels that triggered Environmental Interventions	In 2024, 1,766 (7.7 per 1,000 tested) of the 4,655 children were newly identified with a confirmed blood lead level of 3.5 mcg/dL or above, triggering environmental interventions. This represents a 10% decrease compared to 2023.
Coordinated nursing care for every child with EBLL	For the newly identified children with confirmed EBLL of 5 mcg/dL or greater, a nurse has been assigned to each child to ensure BLL monitoring and coordination of ongoing care.
Elevated blood lead levels in pregnant individuals	In 2024, 285 pregnant individuals were identified with a confirmed blood lead level of 5 mcg/dL or higher, a 3.8% decrease from 2023. Among those with available birth country data, 86% were foreign-born, representing 26 different countries.

Understanding trends in Blood Lead Level testing

New York State law requires children to be tested for lead poisoning at ages 1 and 2. An estimated 86,000 children born in New York City in 2021 were therefore expected to complete both tests by the time they turned 3 in 2024. By the end of 2024, about 66,000 (76%) had received at least one test, while approximately 20,000 remained untested.

6 The 2021 birth cohort of children requiring testing (by 2024) differs from the total number of NYC births reported in 2021 vital statistics because it excludes children who no longer reside or relocated out of New York City during the three-year testing period.

This pattern reflects an ongoing challenge. In recent years, testing rates have hovered around 80%, with 79% of children in the 2020 birth cohort tested at least once by the time they turned age 3 in 2023. For the 2021 cohort, 76% were tested once, and preliminary data suggest that about 78% of the 2022 cohort will have been tested by the time they turn 3 in 2025.

While the majority of at-risk children are successfully screened, roughly one in five consistently remain untested. Potential contributing factors to this persistent gap include families moving out of the city before testing is completed, parental refusal, provider assumptions of low risk in higher-income communities, and cultural barriers to care. In addition, the COVID-19 public health emergency significantly disrupted routine healthcare utilization, leading to a decline in blood lead testing among children.[7]

DOHMH relies on health care providers to conduct lead testing during the child's routine wellness visits at ages one and two, and on parents to bring children to these appointments. To promote testing, the Department employs multiple strategies: annual outreach to providers; matching birth records with testing data to send reminder letters and texts to families who may have missed key visits; collaborating with Medicaid Managed Care Plans to identify providers who have not tested their pediatric patients; launching multilingual media campaigns in buses and subways; and sharing testing recommendations through the CIR Online Registry. If a child is not tested, those with EBLLs cannot be identified, and the Department is unable to initiate investigations. This reactive model makes it harder for children in high-risk communities to receive timely intervention, underscoring the need for expanded and proactive strategies to improve testing compliance.

7 See DOHMH's Annual Report to City Council on Progress in Preventing Elevated Blood Lead Levels in New York City, 2025

Safe Work Practices

Unsafe renovation practices spread lead dust and put children at risk.

Source: DOHMH's unsafe renovations example from a 2018 DOHMH public awareness campaign.

Proactive Monitoring: DOHMH conducts environmental investigations for every child identified with an EBLL, which includes inspecting the child's home and any other location where they spend significant time (more than five hours per week). When a lead-based paint hazard is found, DOHMH issues a COTA to the property owner. This legal order requires the owner to correct the hazardous condition, using safe work practices, within a specified time. DOHMH monitors compliance by conducting follow-up inspections, and if the owner fails to comply, issues violations subject to civil penalties. In cases of continued non-compliance, DOHMH refers the case to HPD, which can perform the necessary remediation work and charge the property owner for the costs.

Following the issuance of a COTA, property owners are required to use certified firms for remediation work and submit documentation before any lead abatement begins. DOHMH conducts post-COTA compliance inspections to confirm that ordered work was completed in a manner consistent with DOHMH directives. If work is ongoing at the time of the compliance inspection, DOHMH will check to see if work is being done according to their lead-safe protocols, including the proper containment and cleanup of dust and debris. These inspections are especially critical in New York City, where the aging housing stock means that renovations often disturb multiple layers of old lead paint. Ensuring safe work practices during abatement and full compliance with the DOHMH order helps prevent further exposure to children and other residents during the remediation process.

Responding to Complaints: In addition to monitoring compliance with COTAs issued during EBLL case investigations, DOHMH operates a safe work practices program that addresses lead exposure risks where a person up to 18 is present. This program responds to complaints from the public, typically submitted through 311, about renovation or construction activities in occupied buildings that may be generating hazardous lead-based dust. These cases are often unrelated to lead abatement and may involve contractors or workers who are unaware of, or not following, lead-safe practices. When work is being performed unsafely — for example, when dust is not contained in a home under renovation — it can pose serious risks to building occupants, particularly children. In such instances, DOHMH conducts inspections, issues Orders to Correct, and serves Notices of Violation where appropriate. This approach is essential for identifying and mitigating potential risks before they result in lead poisoning.

Occupational Lead Exposure: DOHMH also monitors occupational lead exposure, which is the primary cause of lead poisoning among non-pregnant adults in the City. Workers in the construction industry are particularly at risk, as disturbing old paint or contaminated soil can release lead dust and fumes. Additionally, individuals involved in metalworking, ceramics, or other recreational hobbies may be exposed to lead through pigments, glazes, or related materials. Addressing these exposures requires a broader public health strategy focused on education, regulation, and enforcement to protect both workers and the general public.

Unsafe renovation practices—such as dry scraping, sanding, or failing to use proper containment—can spread lead dust throughout homes and put children and families at risk.

Source: DOHMH's unsafe renovations example from a 2018 DOHMH public awareness campaign.

Safe Work Practices: Inspections and Violations	
Indicators	**Metrics**
Proactive Monitoring: Inspection following COTA	In 2024, DOHMH monitored 1,119 buildings for compliance following a COTA and conducted 2,663 inspections. In 2024, DOHMH issued 31 Orders or Notices of Violations for unsafe work associated with a COTA. This reflects a 17% increase in inspections and 25 more violations issued compared to 2023.
Responding to Complaints: Inspections following complaints about unsafe work practices	In 2024, DOHMH conducted 2,127 inspections in 893 buildings in response to complaints, identified unsafe work practices in 327 (36%) of these buildings, and issued 463 Orders or Notices of Violation. This reflects a 78% increase in inspections and a 54% increase in violations issued compared to 2023.
Occupational Exposures: Individuals affected by unsafe work practices	Between 2016 to 2018, 15 out of every 100,000 workers had an EBLL above 10 mcg/dL, totaling 1,771 individuals.[8]
Monthly inter-agency inspections in high-risk areas	Since 2020, DOB and DOHMH, as a joint taskforce, inspect 3-5 buildings per month in high-risk areas.

Understanding inspection, violation, and safe work practices trend data

The inspection and violation data from 2024 highlight two key dynamics in DOHMH's lead enforcement work. First, buildings monitored following a COTA saw a sharp drop in violations, despite a high number of inspections. DOHMH monitored 1,119 buildings for COTA compliance and conducted 2,663 inspections — a 17% increase from the previous year — and issued 31 violations, 25 more than in 2023. Still, violations were relatively limited: fewer than 3% of buildings monitored in 2024 received a violation. This comparatively low rate reflects the Department's rigorous oversight process: before work begins, DOHMH requires contractors to be certified, documentation to be submitted, and work methods to meet lead-safe standards. As a result, many property owners are already in compliance by the time of inspection, and active sites are closely monitored for safety.

8 In New York City, the most common cause of lead poisoning in non-pregnant adults is from working in the construction industry. Workers are exposed by breathing or ingesting lead dust or fumes during work that disturbs old lead-based paint. Workers in other industries, as well as hobbyists, may be at risk if they work with lead-containing metal, paint, pigments, ceramic glazes or bullets. Source: New York State Heavy Metal Registry; U.S. Bureau of Labor Statistics Current Population Survey.

Second, inspections triggered by 311 complaints about unsafe work practices — unrelated to an EBLL or COTA — reveal an ongoing risk. In 2024, DOHMH conducted 2,127 inspections across 893 buildings in response to these complaints. Unsafe work practices were identified in 327 of those buildings (36%), resulting in 463 violations — a 78% increase in inspections and a 54% increase in violations compared to 2023. This trend points to widespread noncompliance among contractors and workers who may not understand or follow lead-safe protocols, despite disturbing lead paint during renovations or general repair work. The unsafe work practices program exists to respond to these risks. Unlike COTA-related work, these investigations are not tied to a child's exposure but rather aim to prevent exposure in the first place. When construction work in occupied homes is poorly contained, dust and debris may contaminate living spaces, creating a serious hazard — especially for children. To support safer renovation practices and reduce lead exposure risks, DOHMH offers free Renovation, Repair, and Painting (RRP) training classes through its Healthy Homes Program. Taught by EPA-certified instructors, these classes train contractors, building owners, superintendents, and others working in pre-1978 buildings to meet both federal and Local Law 1 requirements and allowing them to become EPA Certified Renovators.

Unsafe work practices are not just a residential risk — they also endanger workers. Between 2016 and 2018, 1,771 workers were identified with blood lead levels above 10 mcg/dL— roughly 15 per 100,000 workers. Additionally, DOHMH and the Department of Buildings conduct joint inspections in 3–5 high-risk buildings per month to catch these conditions early and intervene. Despite strong oversight in post-COTA inspections, the increase in violations from complaint-based inspections signals that unsafe renovation work continues to threaten public health.

Education and Outreach

Education and outreach are central to DOHMH's efforts to raise public awareness about lead poisoning risks and prevention strategies. DOHMH distributes multilingual educational materials and organizes community outreach events to inform residents about lead exposure, testing, and preventive measures.

Promoting blood lead testing is a critical component of these efforts, focusing on getting children tested at ages one and two, as mandated by New York State law. DOHMH engages healthcare providers and Medicaid organizations to boost testing rates through targeted outreach and awareness campaigns. Targeted interventions further support at-risk populations by addressing lead-exposure risk factors and barriers to care.

DOHMH also collaborates with community and faith-based organizations, housing groups, and healthcare providers to extend its reach and provide resources. These partnerships enhance DOHMH's ability to identify at-risk individuals, promote testing, and support those most impacted by lead exposure.

Education and Outreach Focused on Childhood Lead Poisoning Prevention	
Indicators	**Metrics**
Education materials are distributed in multiple languages to increase awareness of childhood lead poisoning.	In 2024, DOHMH distributed more than 101,000 copies of printed educational materials in 16 languages on preventing lead poisoning among children, pregnant people, and workers in high-risk occupations.
Outreach focused on childhood lead poisoning prevention	In 2024, DOHMH organized over 700 education and outreach events. More than 19,500 New Yorkers participated, whereas in 2023, more than 16,000 New Yorkers participated in over 480 education and outreach events.

HOUSING PRESERVATION AND DEVELOPMENT

HPD by the numbers in 2024

- 81,269 complaints received
- 76,021 inspections attempted
- 21,854 lead-related violations issued
- 59 violations per day
- 91 HPD inspectors conducting fieldwork
- 722 apartment units remediated for lead hazards
- 110 emergency repairs completed following COTA
- 543 buildings audited following COTA referrals, 84 violations issued
- 207 buildings audited in yearly BLI, 36 violations issued
- 17 buildings with a total of 1,200 units were subject to civil enforcement actions

The Department of Housing Preservation and Development (HPD) plays a primary role in addressing lead-based paint hazards in New York City housing. Its responsibilities span inspections, enforcement, education, and remediation, all aimed at ensuring property owners meet safety standards and protect children under the age of six. Lead-based paint is identified using X-ray Fluorescence (XRF) testing, which measures the lead content of paint. In 2021, New York City lowered the definition of lead-based paint from 1.0 milligrams of lead per square centimeter (mg/cm²) to 0.5 mg/cm² — a unit that measures the concentration of lead on a painted surface by weight over area — underscoring the City's commitment to strengthening protections for children by addressing even lower levels of lead-based paint in housing.[9]

One of HPD's most significant challenges to mitigate lead-based paint hazards is gaining access to apartments. Access is needed multiple times during the process, including for inspecting, testing, performing remediation work, and/or collecting dust samples for testing. Each additional visit increases the risk of HPD staff being denied access, which may occur when tenants or owners are not home or refuse entry.

9 Under Local Law 1, lead-based paint was previously defined as paint containing 1.0 mg/cm² of lead or greater, as determined by laboratory analysis or by an XRF analyzer. Local Law 66 of 2019 reduced this threshold to 0.5 mg/cm², effective December 1, 2021. This change affects HPD's issuance and contestation of violations and requirements related to exemption applications. Local Law 31 of 2020 requires building owners to complete XRF inspections of all apartments by August 2025 and Local Law 111 of 2023 extended that requirement to common areas. Lead content is typically measured using handheld XRF analyzers, which provides on-site, non-destructive readings of lead concentrations in paint. In some cases — such as inconclusive XRF readings — laboratory analysis of paint chip samples may be used to confirm lead content. Certain DOHMH actions may still apply to concentrations as low as 0.5 mg/cm² or 0.25% by weight. See: NYC HPD Lead-Based Paint Threshold FAQs.

To improve access, HPD has made scheduling improvements to conduct inspections during evenings and weekends to better accommodate tenant schedules. However, repair work generally occurs during regular business hours.

If a tenant actively denies access, the HPD work order is canceled. After two failed attempts to gain access, HPD sends a letter asking the tenant to schedule an appointment. The job is canceled if the tenant does not respond within ten business days or access is denied after scheduling. When this happens, the lead-based paint hazard violation remains open.

Since February 2021, tenant occupied 1-2 family homes built prior to 1960 now fall under the umbrella of HPD's enforcement model. Tenants in one- and two-family private owned homes may have informal relationships with property owners and may be unaware of lead hazard risks, or may not report unsafe renovation or construction, making these homes harder to proactively monitor for lead hazards. Recent legislative expansions now require lead-based paint inspections and hazard remediation in these smaller rental properties.[10]

A second challenge for HPD is to expand their inspection and enforcement program to comply with recent local legislation changes. For example, Local Law 111 of 2023, in addition to placing new testing requirements on property owners related to common areas, also added a requirement for HPD to conduct visual inspections of common areas when conducting an inspection of a dwelling unit where a child of applicable age resides. HPD is currently procuring new contracts for code enforcement systems upgrades and expanding code enforcement staff to meet the requirements of local laws, including Local Law 111 of 2023.

Complaints, Inspections, and Enforcement

Enforcement authority is a primary responsibility for HPD. When property owners fail to address violations, HPD facilitates emergency repairs to eliminate lead-based paint risks. Tenants can file complaints with HPD through 311 for housing quality and safety concerns. 311 complaints can range from peeling paint, mold, broken plaster, or water damage around the home, which are then used as a proxy to identify lead-based paint hazards when children under six are in the home in a building built prior to 1960. Inspections of these complaints, or any inspections involving an apartment with a child under six residing in an apartment in a building built prior to 1960, can result in a lead-based paint violation if a hazard is identified. If a violation remains unresolved by the landlord, HPD will attempt to make the repair through a private contractor.

10 Local Law 29 of 2020 extended lead hazard requirements to one- and two-family rental homes not occupied by the owner or owner's family. Local Law 31 of 2020 mandates certified lead-based paint inspections using XRF analyzers for all pre-1960 residential buildings—and those built between 1960 and 1978 with known lead-based paint—including one- and two-family homes, with deadlines in 2025 or sooner if a child under six resides in the unit.

Lead-Based Paint Complaints and Inspections	
Indicators	**Metrics**
Complaints received by HPD prompting lead hazard inspections	In FY24, 81,269 complaints were received, prompting lead hazard inspections. This is a 19% increase from FY23 (68,138).
Complaints prompting lead hazard inspections in HPD-owned buildings	In FY24, 47 complaints were received prompting lead hazard inspections in HPD-owned buildings. This is a 32% decrease from FY23 (62).
Total complaint inspections attempted by HPD for lead hazards	In FY24, 76,021 inspections conductions were attempted. This is a 20% increase from FY23 (63,355).
Total inspections attempted for lead in HPD-owned buildings	In FY24, 65 inspections conductions were attempted in HPD-owned buildings which is a 54% decrease from FY23 attempted inspections (100).
Enforcement for Lead-Based Paint Hazards	
Indicators	**Metrics**
Total violations issued by HPD	In FY24, 21,854 violations for lead-based paint hazard were issued. This is a 21% increase from FY23 (18,112).

Understanding HPD's complaint metrics

HPD received more than 81,000 complaints – an average of 222 per day – that prompted lead-based paint hazard inspections in FY24, a 19% increase from the previous year. This rise is likely driven by a broader uptick in complaints related to water damage affecting painted surfaces, which any level of complaints revolving around water, peeling paint, and, or mold, can trigger lead inspections if a child resides in the home. Increased public awareness, intensified outreach, and heightened concern about lead risks may also be contributing factors. While the gradual demolition and renovation of aging housing stock is helping reduce potential lead hazards, the surge in complaints highlights both ongoing risks and the City's expanded capacity to identify and address hazards through improved outreach and faster response systems.

This may also represent a post-pandemic rejuvenation in the City. The volume of complaints may underscore issues related to deferred maintenance during and after the pandemic, especially in older buildings hit hard by lack of access during the pandemic and rent related issues since that time. HPD attempted 76,021 complaint inspections in FY24, a 20% increase from FY23, reflecting the agency's volume of work to address the surge in complaints.

Understanding HPD's enforcement metrics

HPD issued more than 21,800 violations – an average of 59 per day – for lead-based paint hazards, representing a 21% increase from FY23. The increase in the number of violations may reflect increased inspection activity, leading to the identification of more hazards, and the issues with deferred maintenance referenced earlier. This data suggests both progress and challenges. The surge in complaints and violations demonstrates the persistent scale of lead-based paint hazards in New York City and the need for continued focus on prevention and enforcement to address these risks effectively.

HPD's technical staff manage compliance with the Housing Maintenance Code and HUD guidelines by responding to complaints, performing inspections, issuing violations, and overseeing emergency repairs and environmental abatement. Their responsibilities also include field assessments, dust wipe sampling, XRF testing, and contractor oversight. These inspectors and technical staff perform complex, labor-intensive work that directly protects public health. Recognizing the specialized expertise required, HPD supports staff through EPA certification and lead assignment salary differentials. Looking ahead, scaling this program offers significant opportunity to meeting the City's public health and housing goals, ensuring that enforcement keeps pace with the ongoing need.

Emergency Repairs

When residential property owners fail to correct HPD lead-based paint hazard violations or DOHMH issued COTA's in a timely fashion, HPD classifies the lead hazard as an immediate emergency and intervenes through the Environmental Hazard Unit in its Emergency Repair Program (ERP). The emergency repair can involve lead-based paint abatement, remediation, and/or lead dust wipe clean-up, carried out by certified contractors. The cost of these repairs is then billed to the property owner. HPD also manages lead-based paint hazard reduction in HPD-owned housing, ensuring these properties meet the requirements of Local Law 1.

Emergency Repairs Performance	
Indicators	**Metrics**
Remediation by the city performed to correct conditions of violations[11]	In FY24, 722 unique apartment remediations were performed to correct violations, representing a 48% increase from 489 in FY23.
Remediation work performed by the City in response to referrals from DOHMH under a COTA	In FY24, following a COTA, 110 apartment remediations were performed, down from 179 in FY23, representing a 38% decrease.
Remediation performed by the city in HPD-owned building	In FY24, 27 corrections were made to address lead-based paint hazards in HPD-owned buildings, nearly identical to the 28 performed in FY23.

Understanding HPD's emergency repair metrics

In FY24, the city executed 48% more distinct apartment remediations for lead-based paint violations than in FY23, completing a total of 722 apartments. The agency consistently strives to meet its responsibilities and goals to correct lead-based hazards in homes, following years of increased complaints, inspections, and concerns.

In contrast, emergency repairs performed to correct a violation after a property owner failed to remediate following a COTA totaled 110 in FY24, compared to the 179 completed in FY23. Variations in this metric may be influenced by property owner compliance following COTA issuance, access limitations, and resource limitations, which all together impact the City's ability to execute emergency repairs when landlords fail to act.

HPD owns a small portfolio of ninety-five buildings in New York City that it manages through its Office of Asset and Property Management (APM). For HPD-owned buildings, 27 corrections were performed in FY24, nearly the same as the 28 performed in FY23. This consistency suggests that HPD's management of its own properties remains in good control.

Overall, the increase in remediations citywide is a positive development, reflecting better efforts to mitigate lead-based paint risks. The lower number of remediations following COTA non-compliance indicates opportunities to support property owners in fulfilling their responsibilities and ensuring that lead-based paint hazards are addressed.

11 During FY24, HPD utilized twelve requirement contracts with EPA-certified lead abatement firms for lead hazard reduction work, with a maximum annualized award capacity of approximately $6,000,000. Two additional contracts with another EPA-certified lead abatement firm are maintained for lead dust cleanup and are valued at $200,000. In addition, HPD utilized pre-qualified vendors to award lead hazard reduction work on an as needed basis.

Legally Mandated Audits

HPD must conduct audits to comply with new local laws aimed at strengthening lead-based paint safety, turnover compliance, and record-keeping requirements. The scale of expanding auditing capabilities and contracting to set new technology resources in place has significantly delayed the implementation of this mandate; at present, HPD does not expect to be in full compliance with some of the requirements until late 2026:

- Under Local Law 111 of 2023 (effective June 2024), property owners must conduct lead-based paint testing of common areas. HPD is authorized to request these testing records and will begin to do so for all audits beginning in August 2025 when the testing is required to be done.
- Local Law 123 of 2023 (effective September 2024), requires HPD to (a) audit records related to annual notices and investigations (where applicable), as well as conduct proactive XRF testing whenever a turnover violation is issued and (b) require property owners prior to or upon turnover to abate all lead-based paint on doors or windows with friction services and make sure all bare floors are smooth and cleanable. The auditing required by this law is delayed as mentioned above.
- Local Law 122 of 2023 (effective September 2024) requires HPD to (a) audit records related to annual notice and investigation (where applicable) and conduct proactive XRF testing whenever a lead-based paint violation is issued and (b) dismiss record-keeping violations if property owners submit necessary forms with either 10 consecutive years of records or at least 3 years of records along with a $1,000 fee per missing year. The auditing required by this law is delayed as mentioned above.
- An additional legally mandated audit, under Local Law 127 of 2023, is already in effect and has been carried out by HPD. This law modifies the requirement from 2019 for HPD to audit at least 200 buildings annually, by including in the selection criteria specific buildings which were issued violations for not complying with Local Law 1's turnover provision, and by removing two previously used random selection categories.
- The Building Lead Index (BLI) is a tool used by HPD to identify high-risk buildings for these audits by analyzing factors like past violations, environmental conditions, and geographic areas with elevated blood lead levels. [12]

12 Local Law 70 of 2019 (Local Law 70) requires that HPD audit the records of a minimum of 200 buildings each fiscal year to determine the owner's compliance with Local Law 1 of 2004, et seq. Local Law 70 and § 27-2056.17. (b). requires that the selection process of the buildings to be audited include, but need not be limited to, the following criteria: (1) buildings with peeling lead-based paint violations issued as a result of positive XRF tests; (2) buildings with violations that have been issued for other indicators of deteriorated subsurface including, but not limited to, mold and leaks; and (3) buildings with turnover violations. In order to meet this new requirement, HPD is modifying its methodology for the selection of buildings to audit, referred to as the Building Lead Index (BLI). To reach the required minimum number of buildings, HPD may choose to audit buildings other than those produced by this Index or limit selection to the criteria outlined above, as provided for under § 27-2056.17. (b). HPD will coordinate with the Department of Health and Mental Hygiene on the prevalence of elevated blood lead levels in certain geographic areas in the building selection process.

Audits of Records Related to Lead-Based Paint	
Indicators	**Metrics**
Audits following COTA referrals	In FY24, 543 buildings are audited following DOHMH's COTA referrals. This is a decrease compared to 573 in FY23.
Apartments issued violations for lead-based paint hazards in EBLL audited building	In FY24, 84 apartments were issued violations for lead-based paint hazards following the audit from DOHMH referral, which is 33% more than in FY23, when 63 apartments were issued violations.
Buildings audited based on HPD's BLI	In FY24, HPD audited 207 buildings based on BLI, which is the same as in FY23 (207).
Apartments issued violations for lead-based paint hazards in BLI-audited buildings	In FY24, 36 apartments were issued a violation for lead-based paint hazards following the audit based on BLI, whereas 30 apartments were issued this violation in FY23.

Understanding HPD's audit data

HPD audited 543 buildings referred by DOHMH under the COTA requirements for EBLL cases, presenting a slight decrease from the 573 buildings in FY23. These audits resulted in 84 apartments being issued violations for lead-based paint hazards, compared to 63 violations issued in FY23, showcasing that these audits are crucial for the City to identifying buildings with high lead risks.

In buildings identified through HPD's BLI, 207 audits were conducted, consistent with audits conducted in FY23. Following these audits, 36 apartments were issued violations for lead-based paint hazards, compared to 30 in FY23 which represents a 17% increase of identified buildings with violations. This indicates that targeted audits of high-risk buildings remain an important tool in proactively identifying and addressing lead-based paint hazards.

While the volume of audits may vary from year to year, the data suggests that HPD effectively uses these audits to correct problems in buildings where lead hazards are most prevalent, ultimately increasing their awareness. This underscores the value of collaborative data-driven tools like the BLI and DOHMH referrals in prioritizing resources and promptly identifying and addressing lead hazards.

Legal Intervention

When legal intervention is warranted, HPD initiates litigation to compel corrective action and enforce recordkeeping obligations under Local Law 1 and pursues civil penalties against property owners who fail to comply with lead-based paint requirements. Enforcement is a core mandate and HPD utilizes legal remedies in cases of noncompliance.

Legal Intervention	
Indicators	**Metrics**
Civil action for corrective action and non-compliance	In FY24, 17 buildings, comprising over 1,200 units—were found non-compliant and issued orders to correct, resulting in $230,000 in civil penalties.
Civil actions brought against the false certification of violations	In FY24, there was 1 instance where HPD sought civil penalties when a property owner falsely certified the correction of a condition, identical to FY23.
Civil actions seeking a warrant to access a home for HPD to perform emergency repairs	In FY24, the Housing Litigation Division (HLD) prosecuted 151 access warrant cases to allow EHU to perform lead repairs. In comparison to 75 issued in FY23, showing a 100% increase.

Understanding HPD's use of Legal Intervention

HPD utilizes legal intervention mostly on compliance cases where they can hold property owners or landlords accountable when not meeting lead-based paint requirements. In FY24, HPD's enforcement efforts resulted in over $230,000 in civil penalties and orders to correct across 17 buildings containing more than 1,200 homes. Notably, $180,000 of these penalties were associated with two landlord portfolios comprised of 12 buildings in the Bronx and Manhattan.

Access warrants and false certification violations is a smaller caseload for HPD. The Housing Litigation Division (HLD) initiated 151 access warrant cases in FY24, which demonstrates a 100% increase from the 75 cases requested in FY23. This sharp rise indicates a growing use of legal action to overcome access barriers, ensuring HPD can carry out critical lead hazard repairs when landlords or residents fail to comply.

The data highlights the value of civil actions as an enforcement tool. Civil penalties and orders to correct can target entire landlord portfolios, helping to address noncompliance across a large number of units. While the consistency in addressing false certifications suggests a steady approach and general compliance from property owners. The significant rise in access warrant cases highlights an increasing need to navigate tenant or landlord resistance to ensure timely remediation of lead hazards. This trend describes the ongoing challenges HPD faces in gaining access to properties, correcting non-compliant behavior of property owners, and the critical role of legal interventions in protecting public health.

Lead-Based Paint Hazard Repair Assistance to Owners

HPD's Lead Hazard Reduction and Healthy Homes Program (also known as the Primary Prevention Program/PPP) assists owners of older rental buildings and homes to proactively assess their building's lead paint situation through comprehensive inspection and testing; and

HPD Staff distribute outreach materials during the 2024 National Lead Poisoning Prevention Week, raising public awareness about lead safety and prevention

Source: NYC Department of Housing Preservation and Development

finances the repairs needed to eliminate lead-based paint hazards, making the housing safer and healthier for current and future occupants. The program is funded primarily through a series of HUD Lead Hazard Reduction Grants, which by and large set the eligibility rules for enrollment: buildings must be occupied mostly by low- and very low-income tenants or owner-occupants; must have at least some units with children under age six living or frequently spending more than 10 hours per week; and must have been constructed prior to 1960. In December 2024 the program completed one multi-year HUD grant and commenced a new four-year, $7M HUD grant. The program plans to remediate lead-based paint hazards in at least 280 units under the new grant, using a combination of federal grant funding and city capital.

Education and Outreach

As part of its role in lead hazard prevention, HPD conducts education and outreach to both property owners and tenants. HPD provides information about lead hazards through a variety of approaches, including webinars, informational bulletins, and public awareness campaigns. These efforts aim to increase understanding of lead-based paint risks and promote compliance with safety regulations. HPD also collaborates closely with DOHMH on lead-based paint poisoning prevention initiatives, including the annual observance of National Lead Poisoning Prevention Week (NLPPW) held during the third week of October, leveraging interagency partnerships to amplify its outreach and ensure at-risk populations receive the resources and support they need to prevent lead exposure (See page 38 on DOHMH's public outreach efforts). Since partnering with DOHMH on NLPPW in 2022, the initiative has demonstrated measurable year-over-year growth expanding its footprint across additional locations, increasing the number and variety of events hosted and significantly broadening its reach to vulnerable populations.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP by the numbers in 2024

- 7,000 miles of NYC's water supply system
- 1,100 City-owned lead service lines replaced
- 857,000 private service lines connect to the City's water system
- 120,163 private service lines identified as containing lead
- 123,758 private service lines are made of unknown material
- 6,200 private lead service lines have been replaced
- 310 lead-free tests conducted across all 63 water distribution sites
- 12,600 water testing kits distributed to the public
- 5,800 water testing kits returned and analyzed

The New York City Department of Environmental Protection (DEP) safeguards the City's water supply and takes measures to minimize the potential for lead exposure from drinking water through private plumbing. New York City's delicious and high-quality tap water is delivered lead-free through 7,000 miles of lead-free aqueducts, tunnels, and water mains in the city's water supply system.

Upcoming federal and local mandates aimed at reducing lead exposure and requiring the replacement of privately-owned water infrastructure within the City will pose significant challenges. New federal regulation, the Lead and Copper Rule Improvements (LCRI), which takes effect in November 2027, requires replacement of all lead service lines (LSL) in the control of the City within 10 years (by 2037).[13] However, water service lines in New York City are not owned by the City, and therefore are not under control of the City; replacement of those lines will require homeowner cooperation. Although there is no lead in the city's distribution system, pilot testing indicates that DEP will likely fail the initial round of sampling required under the LCRI, because of the presence of lead in some private service lines. This revised regulation lowers the action level, requiring 90% of sampled tap water to contain lead below 10 parts per billion (ppb). Failure to meet this stricter standard (down from 15ppb) would trigger citywide notification requirements to a population of more than 8.5 million residents, heightening public concern and necessitating immediate mitigation measures. Concurrently, DEP must submit a Service Line Replacement Plan to New York State by 2027, intensifying the urgency to address the risks posed by LSL (40 CFR § 141.84(c)).

New rules will challenge DEP to develop and implement strategies that manage compliance with stricter regulatory standards. Achieving compliance with upcoming mandates will demand new resource-intensive approaches and strengthened stakeholder collaboration.

13 See EPA's Lead and Copper Rule Improvements

Mayor Eric Adams speaks at a press event on the $48 million initiative to help low-income homeowners replace lead water lines.

Source: NYC Mayor's Office. Bronx, October 9, 2024.

At the same time, DEP must maintain public confidence in the safety and reliability of New York City's water supply.

In 2021, President Biden signed the Bipartisan Infrastructure Law (BIL), which dedicated $15B to LSL replacements nationwide. EPA's strategy to address lead in drinking water under the BIL prioritizes LSL replacements in environmental justice communities with high concentrations of LSL.[14] To date, New York City has applied for approximately $96M in Federal grants for LSL replacements in environmental justice neighborhoods in the Bronx, Brooklyn, and Queens where there is demonstrated severe financial hardship.

The award criteria used by New York State restricted New York City to $24M a year, with $10M in grant funding and $14M in interest-free financing. To date, New York City has been awarded $72M ($30M in grant funding and $42M in interest-free financing) with the potential to replace approximately 4,000 LSL. New York City anticipates receiving another $48M in the future, for a total of $120M ($50M in grants and $70M in no-interest loans) over 5 years.

14 See Bipartisan Infrastructure Law: EPA's Water Infrastructure Investments and the EPA's previous definition of environmental justice.

Privately Owned Water Service Lines

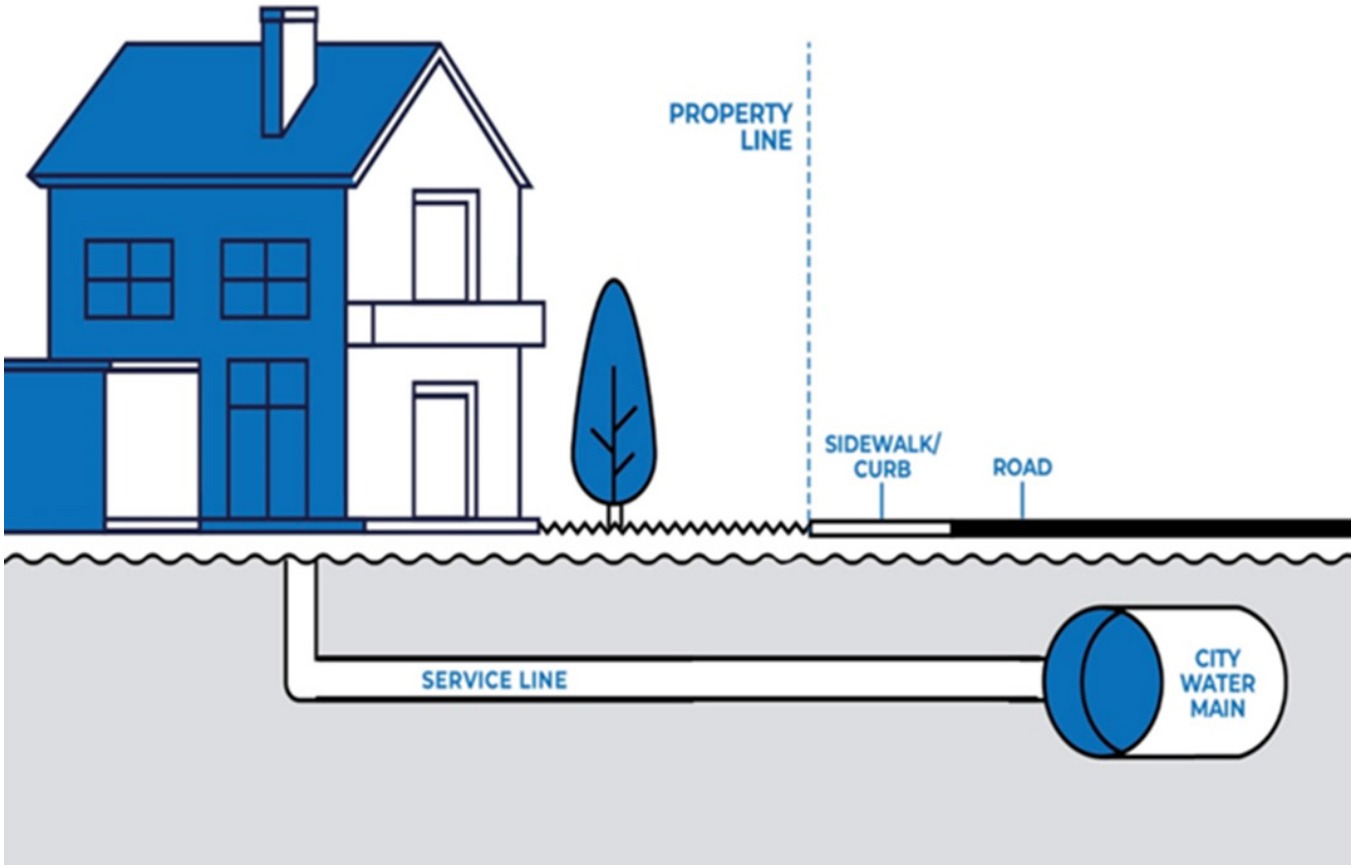


Diagram of water lines

Source: NYC Department of Environmental Protection

In New York City, the property owner owns the water service line in its entirety, from the home all the way to the water main in the street. Property owners are responsible for the maintenance, repair, and replacement of their service lines. Currently, there are no known City-owned LSLs. Every two years, DEP undertakes a comprehensive review of City-owned properties and service line records to identify any potential LSLs. Those locations are then investigated and, if the service line is confirmed to be lead, the City replaces the service line immediately. To date, 1,100 City-owned LSL have been replaced since 2005.

Preventing lead from entering drinking water

DEP's Water Quality Directorate conducts rigorous testing of the water supply, collecting thousands of samples annually from reservoirs, aqueducts, treatment facilities, and street-side sampling stations across all five boroughs to detect lead and other contaminants. Through Corrosion Control Treatment, DEP adjusts pH levels to reduce water corrosivity, and adds orthophosphate, a protective food-grade additive that forms a barrier on the inside of pipes, preventing lead from leaching into drinking water.

Preventing Lead from Entering Drinking Water	
Indicators	**Metrics**
Collection and testing of water samples	From January 1, 2024, through June 30, 2024, water samples were collected quarterly from 63 distribution sites for lead and copper analysis, consistent with the previous year.
Lead findings at water distribution sites	Annually, 310 tests from all distribution sites were found to be lead free.

Understanding drinking water metrics

The City follows all required steps to test drinking water and protect public health as seen in DEP's data where they conduct constant testing. When lead is found in water, it derives from residential building water lines attached to the City's water main. A common misconception is that lead may be in all pipes that enter a household, including the water main. DEP's distribution sites and water mains have all been confirmed to be lead-free.

With LCRI set to take effect in early 2027, pilot testing indicates that DEP is likely to fail the initial round of mandated sampling in early 2028 due to the presence of private LSLs. As the water monitoring unit expands sampling efforts, areas with privately-owned lines showing trace amounts of lead should be used to inform targeted neighborhood-level outreach and mitigation campaigns.

Lead Testing Kits

DEP's distribution of free residential water test kits empowers New York City residents to test for and monitor lead concentrations in their drinking water. Through 311, residents can request to have free lead testing kits delivered to them.

Lead Testing Kits	
Indicators	**Metrics**
Free water test kit distribution rate	In FY24, 100% of individuals who requested a water test kit to check lead concentration in drinking water received one, consistent with the previous year.
Rate of test kit returned	In FY24, approximately 46% of all requested or distributed test kits—around 5,800—were returned to DEP for analysis, consistent with the previous year's return rate.
Agency coordination with DOHMH	For every elevated lead detection (+above 15 lead ppb) in water, a notification alert was sent to DOHMH.

Understanding lead testing kit data

During FY24, DEP ensured that 100% of individuals who requested a water test kit received one, resulting in the distribution of approximately 12,600 test kits. This metric was consistent with that of FY23, when 100% of requesters received a kit. Of those kits distributed, approximately 46% or 5,800 test kits, were returned to DEP for analysis, providing essential data on household water quality. This return rate was consistent for both FY23 and FY24. As New York City residents can request lead testing kits through 311, the city's interactive service request map can be searched to see where in the city kits are being requested, as well as the status of those requests (see Appendix II).

To further safeguard public health, DEP has established strong coordination with DOHMH. For every instance where elevated lead levels in water were detected (above 15ppb), DEP promptly issued a notification alert to DOHMH to enable timely follow-up and intervention. Additionally, DEP sends lead water testing kits to the homes of children referred by DOHMH. The joint effort is another example of the near constant cross-agency collaboration required to further our lead mitigation efforts.

Progress to replace lead service lines

Mayor Eric Adams observes the replacement of a privately-owned lead service line during the expanded launch of a $48 million program to help homeowners in environmental justice communities in the Bronx and Queens replace lead or galvanized steel water lines at no cost.

Source: NYC Mayor's Office. Bronx, October 9, 2024.

New York City's water distribution system supports about 857,000 service lines, which connect individual properties to the City's water supply. Of these, approximately 120,163 lines are confirmed to be made of lead, posing a potential risk of lead contamination. The number of LSLs declines over time as they are replaced. Reasons for LSL replacements fall into various categories, including wear and tear, the BIL-funded neighborhood replacement program, and proactive replacements by the City during water and sewer main construction work.
Additionally, the material of 123,758 lines is unknown, but these lines may also contain lead. Addressing this issue of the unknowns remains an LCRI requirement and a significant priority in the City's commitment to a lead-free water system.

Using available BIL funding, DEP is replacing LSLs across the city, prioritizing no-cost replacements for privately-owned lines in environmental justice communities with high concentrations of LSL. While many replacements fall under this no-cost initiative, others—particularly those required under the LCRI mandate or due to normal aging and wear—will remain the responsibility of homeowners.

Progress in Replacing LSLs	
Indicators	**Metrics**
Water distribution service line in New York City	There are 857,000 service lines distributed throughout New York City. Approximately 120,000 are made of lead and 124,000 are made of unknown material, which may potentially contain lead.
Replacement progress of non-city owned Lead water service lines	Between 2020 and 2024, 6,200 lead service lines have been replaced.

Understanding lead service lines replacement progress

Though LSLs are not a major source of lead exposure in New York City, it remains important to replace them to further minimize the risk of lead leaching into drinking water. Progress on LSL replacements is well underway, with approximately 6,200 LSLs, representing 5% of the known lead inventory, having been replaced since 2020.

The LCRI mandates that all LSLs "under the control of the water system" be replaced by 2037, regardless of whether lead action levels are exceeded. The rule also sets a minimum annual replacement rate of 10%.[15] While compliance deadlines are still pending, DEP is proactively taking steps to operationalize core components of the rule.

Because LSLs are privately owned in New York City, full compliance will require significant funding and extensive coordination with property owners. DEP is actively pursuing federal and state support to subsidize replacements, particularly for low-income households. However,

15 40 CFR § 141.84(d)(4), (5)).

in the absence of a legal requirement, homeowner participation in these programs has been limited—even when the cost is fully covered. In that regard, local legislation requiring property owners to replace LSLs has been proposed. (See Local Law Proposal, Intro. 942 of 2024).

Mapping water service lines

To enhance transparency and empower residents, DEP provides an interactive public map of all water service lines in New York City (see Appendix III). This tool allows users to identify the material composition of service lines at specific addresses, where known, helping residents assess potential lead risks. The map is updated every six months to ensure accuracy and reflect the latest data on service line replacements and material classifications.

In November 2024, DEP launched the Service Line Identification Form for homeowners to self-identify their service line material online to assist with updating the inventory.

Public map of water services lines	
Indicators	**Metrics**
Public map of lead service lines in New York City	An interactive map of all water service lines is available on DEP's website and updated every 6 months. It was last updated on 6/24/2025. The next update will be available January 2026.

For guidance on how to identify the material of your water service line, please visit nyc.gov/dep/lead.

NEW YORK CITY HOUSING AUTHORITY (NYCHA)

NYCHA by the numbers in 2025

- 157,000 total public housing units
- 147,184 units identified for XRF lead testing
- 109,952 units tested with XRF to date
- 50,259 units tested positive for lead-based paint
- 59,693 units tested negative for lead-based paint
- 33,723 visual assessments completed
- 13,000 units successfully abated for lead hazards
- 500 abatements per month
- 37,259 units remain in need of abatement
- 73 COTA issued by DOHMH

The New York City Housing Authority (NYCHA) oversees approximately 157,000 public housing units, of which 147,184 required lead-based paint testing to meet the stringent standard of 0.5 mg/cm^2. On January 31, 2019, the City of New York, NYCHA, the U.S. Attorney's Office for the Southern District of New York (SDNY), and the U.S. Department of Housing and Urban Development (HUD) signed a joint agreement to address lead-based paint and other environmental hazards throughout NYCHA's portfolio.[16] The HUD agreement marked a turning point in NYCHA's efforts to eliminate lead-based paint hazards and improve housing conditions for residents. To achieve lead-safe housing in compliance with the HUD agreement, NYCHA implemented a comprehensive, multilayered strategy:

- Conducting detailed inspections using XRF detection tools, with a focus on units housing children under six.
- Expanding efforts to support full lead-based paint abatement across NYCHA's portfolio, prioritizing units with high-risk residents.
- Implementing interim controls, including annual Visual Assessments (VA), biennial risk assessments, and targeted paint remediation.

Additionally, NYCHA improved its resident communication and support strategies, providing notifications about inspections and abatement activities, as well as offering temporary

16 The 2019 HUD Agreement required NYCHA to prioritize lead abatement in developments with known high levels of lead, including two early abatement developments, Harlem River Houses and Williamsburg Houses. These two developments subsequently converted under the Permanent Affordability Commitment Together (PACT) program. This program allows NYCHA to convert developments to a federally funded program, Project-Based Section 8, and to fund comprehensive repairs. Due to their inclusion in the HUD agreement, reporting related to these two developments continues.

relocation options for residents during lead abatement. By adhering to the HUD agreement and leveraging its enhanced compliance and reporting mechanisms, NYCHA is now demonstrating measurable progress towards eliminating lead hazards.

NYCHA's HUD agreement required the Authority to perform VA and stabilize any identified deteriorating paint conditions. As the initial corrective response to the HUD agreement, NYCHA implemented a strategy of performing biannual visual inspections in all residential units classified as target housing where a child under six years of age (CU6) resides or routinely spends ≥10 hours per week, except in cases where the unit has tested as lead-free at the 0.5mg/cm² threshold or has undergone abatement. The primary objective of this strategy was to enable increased surveillance of painted surfaces for deterioration, thereby facilitating the timely identification and scheduling of interim control interventions when paint degradation is observed. As of September 2024, the Federal Monitor approved NYCHA's request to adjust the frequency of visual inspections for units occupied by CU6 from biannual to annual.

However, NYCHA faces challenges in meeting its obligations to correct deficiencies identified during VAs within the specified timelines. Factors such as limited access to units, scheduling conflicts, and changes in testing standards have hindered the Agency's ability to complete remediation work on time. These are similar issues to those faced by HPD. NYCHA's requirements to limit overtime, which limits weekend work, as well as resident fatigue from frequent assessments, further complicates the situation. To overcome these obstacles, NYCHA must implement strategies to improve access rates, streamline scheduling processes, and continue to prioritize high-risk units to ensure the timely and effective remediation of deficiencies.

Lead Paint Testing with XRF Machines

On April 15, 2019, NYCHA launched an initiative to test for lead-based paint using XRF devices in over 134,000 apartments within its public housing portfolio. This initiative specifically targeted pre-1978 units that did not have a prior negative XRF test result or a record of lead abatement. The goal was to identify and address potential lead-based paint hazards in older housing stock to enhance resident safety and identify the complete universe of apartments containing lead-based paint which require abatement.

NYCHA identifies lead paint and lead-based paint hazards through the use of an X-ray fluorescence (XRF) analyzer

Source: The NYCHA Journal[17]

However, on December 1, 2021, when New York City implemented a new, stricter standard under Local Law 66 of 2019, redefining lead-based paint as containing 0.5 mg/cm² or more, NYCHA suspended the program, operating under the previous New York City standard, which defined lead-based paint as containing 1.0 mg/cm² or more. While the updated standard reflected an increased commitment to protecting residents, it required NYCHA to re-test a significant portion of their properties.

17 Keeping Residents Safe With Lead Paint Inspections

XRF Testing	
Indicators	**Metrics**
XRF testing initiative for lead-based paint hazard	NYCHA will test 147,184 units to a standard of 0.5 mg/cm² by the end of 2025. As of March 31, 2025, NYCHA tested 109,952 (75%) apartments.
XRF testing results	As of March 31, 2025, 50,259 (46%) units tested positive for lead levels in paint while 59,693 (54%) units have tested negative.

Understanding XRF testing data

Of the 147,184 units NYCHA must test to meet the required standard of 0.5 mg/cm², testing was completed in 75% (109,952) of units as of March 31, 2025. This represents significant progress, and NYCHA is on track to complete testing in all units by the end of 2025.[18]

Of the units where NYCHA completed testing, 46% (50,259) tested positive for lead-based paint and required abatement. This is a substantial portion of tested units, underscoring the scale of NYCHA's ongoing efforts to address lead-based paint. NYCHA reports that it expects to complete all XRF testing by the end of 2025. The large number of units requiring lead abatement demonstrates both the magnitude of lead-based paint and the substantial resources needed to complete necessary remediation and abatement.

Visual Assessments (VA)

As part of the HUD agreement between the City of New York, NYCHA, SDNY, and HUD, the phased VA process focuses on identifying apartments that need interim controls to mitigate potential lead-based paint hazards. Following changes to NYCHA's Lead Action Plan, NYCHA will conduct one VA a year, allowing for better time management for the Agency as they have been progressing in meeting their lead risk mitigation requirements.

18 See January 2025 NYCHA Compliance Certification Report.

Visual Assessments (VAs)	
Indicators	**Metrics**
Phase 1-2024 (January-June) of VAs	In Phase 1, 2024 (January-June), NYCHA attempted 12,651 VAs (99% out of the12,771 CU6 units that required VAs). The un-attempted units did not require a VA as they were vacant or had been converted to PACT. Of those attempted, NYCHA completed VAs for 90% (11,370) of the units.
Phase 2-2024 (July-December) of VAs in not accessed CU6 units during Phase 1 and non-CU6 Units	In Phase 2, 2024 (July-December), NYCHA attempted VAs for 99% of units (34,117 out of total 34,462 units that required VAs.) Of those attempted, NYCHA completed VAs for 65% (22,353) of the units.
Access	The decrease in Phase 2-2024 assessments resulted from an increased "no access" rate, which was 35%. The Phase 1-2024 "no access" rate was 10%.[19]
Remediation of Units Where Lead is Present	
Indicators	**Metrics**
Remediation of deficiencies in CU6 units	From January to April 2025, 2,533 of 5,272 (48%) CU6 remediation work orders were completed.
Remediation of Deficiencies in Non-CU6 units	From July 2024 to April 2025, 1,101 of 5,876 non-CU6 2024 remediation work orders have been completed, representing 18% of the total.

Understanding VA and remediation of units where lead-based paint is present

In Phase 2 of 2024, NYCHA attempted required VAs for 99% (34,117) of the 34,462 CU6 units and other mandated units. However, only 65% (22,353) of these assessments were successfully completed, representing a significant decline from the 90% completion rate achieved in Phase 1 of 2024. This 25% drop over the phasing periods may describe growing obstacles in gaining access to units across the portfolio, further highlighting the need for effective interventions. In FY24, NYCHA's efforts to remediate lead-related deficiencies also revealed substantial backlogs in addressing outstanding work orders.

19 NYCHA's Lead Hazard Control Department's (LHCD) believes general fatigue among residents regarding the number of inspections in their units has contributed to a rise in the No Access rate. Additionally, Phase 2 of 2024 started later than usual in the year and units only received one attempt and to a minor delay in creating the inspection work orders in order to incorporate necessary changes to the inspection protocols, this resulted in a decrease in the access rate.

Beginning January 2024 to April 2025, 48% (2,533) of the 5,272 CU6 work orders identified as needing remediation had remediation marked as completed. Remediation progress on non-CU6 units was slower, with 18% (1,101) of the 5,876 work orders identified as needing remediation had remediation marked as completed. The remediation work from the 2024 VAs is ongoing.

NYCHA's Lead Abatement Program

The NYCHA Lead Abatement Program is called the Team for Enhanced Management Planning and Outreach (TEMPO). NYCHA's TEMPO Team manages the outreach, temporary relocation, inspection, and abatement program in NYCHA apartments where there is known or presumed lead-based paint, and where a child under the age of 6 lives or routinely spends more than 10 hours per week. The TEMPO program has different urgency priorities depending on whether children under 6 live in the apartment or only regularly visit. Under the terms of the HUD agreement, NYCHA is required to abate lead in 50% of its apartments by 2029, 75% by 2034, and all apartments by 2039.

Lead Abatement Across NYCHA's Portfolio	
Indicator	**Metrics**
Lead Abatement across NYCHA	As of March 31st, 2025, 26% of the 50,259 units that tested positive for lead-based paint have been abated (13,000 units). Approximately 74% (37,259 units) still require abatement.
Abatement Progress for NYCHA Apartments	In 2024, 6,039 units were abated—an increase of 26% from the 4,778 units abated in 2023. This averages to about 500 abatements per month in 2024, compared to 400 per month in 2023.

Understanding NYCHA's lead abatement data trends

NYCHA demonstrated measurable progress in lead abatement across its housing portfolio, aligning with the 0.5 mg/cm² lead-based paint standard established by Local Law 66 of 2019 and meeting critical benchmarks outlined in the HUD agreement. As of March 31st, 2025, lead abatement was completed in over 13,000 units, with 6,039 units abated in 2024, averaging about 500 abatements per month.

The HUD agreement requires NYCHA to abate 50% of lead-positive apartments (approximately 35,000 apartments based on current positivity rates of 46%) by 2029. NYCHA is on track to abate over 40,000 apartments by the end of 2029 if it maintains its current rate of abatement. When combining the over 13,000 units abated through the Lead Abatement Program in NYCHA's public housing portfolio with additional abatement completed through Permanent Affordability Commitment Together (PACT) program conversions, over 16,557 units have been abated to meet the updated 0.5 mg/cm² lead threshold.

NYCHA has completed XRF testing for lead based paint hazards in 109, 952 apartments as of March 31st, 2025

Source: The NYCHA Journal[20]

20 The NYCHA Journal, Keeping Residents Safe with Lead Paint Inspections

Development-Specific Abatement: NYCHA's PACT Program

Under the 2019 HUD Agreement, two developments—Harlem River Houses and Williamsburg Houses—were identified as having some of the highest levels of lead-based paint hazards in NYCHA's portfolio. Under the HUD agreement, these properties were required to be 100% abated by January 31, 2024.[21] After the HUD agreement, these two developments were converted through the PACT program and the lead-based paint abatement became part of the rehabilitation scope of work. As part of their PACT conversion, both developments were transferred to third-party management, with NYCHA oversight.

Lead Abatement in NYCHA's PACT Program	
Indicators	**Metrics**
Lead Abatement at Harlem River Houses	As of March 31, 2025, 685 units (99% of the total units) out of 693 total have been abated and cleared at Harlem River Houses.
Lead Abatement at Williamsburg Houses	As of March 31, 2025, 1,602 units (100% of the total required 1602 units that required abatement, 20 units tested negative for lead) out of 1,622 total have been abated and cleared at Williamsburg.
Lead Abatement across PACT Program	As of March 31, 2025, a total of 3,606 units have been abated across the PACT program, including Harlem River and Williamsburg Houses.

Understanding PACT Programs Lead-Based Paint Abatement

As of March 31, 2025 NYCHA and its PACT partners have completed abatement of all Williamsburg Houses apartments requiring abatement, and 99% of the apartments requiring abatement at Harlem River Houses. The near completion of abatement in the units at these developments represents a major milestone for NYCHA, as these developments had some of the largest amount of lead-based paint in NYCHA's portfolio.

At Williamsburg Houses, 1,602 apartments requiring abatement were fully abated and cleared as of March 31, 2025. An additional 20 apartments tested negative for lead, meaning 100% of the apartments requiring abatement have now been addressed. Harlem River Houses has abated 685 of the 693 total units — or 99%. NYCHA and its PACT partners anticipate completing abatement at Harlem River Houses by Q2 FY2025.

Although neither development met the January 31, 2024 deadline for 100% abatement (due to delays in closing and changes in the City's lead-based paint threshold standards), the near completion of abatement at Harlem River and Williamsburg Houses marks a milestone

21 See 2019 HUD Agreement, Ex. A ¶ 8.

in NYCHA's efforts to comply with the HUD Agreement and improve resident safety at historically high-risk sites. These projects required the temporary relocation of residents during construction, adding logistical complexity on top of accelerated abatement timelines.

Across the broader PACT portfolio, NYCHA's Real Estate Development Department reports that as of March 31st, 2025, approximately 3,606 out of an estimated 4,977 units — or about 72% — requiring abatement had been completed, with 3,557 abated at the updated 0.5 mg/cm² lead threshold.

This progress reflects NYCHA's broader commitment to environmental health and compliance, while demonstrating the capacity of PACT to address lead hazards at scale in partnership with third-party developers and service providers.

DOHMH COTA and NYCHA's HUD Requirements

NYCHA has specific obligations under the HUD Agreement in response to COTA issued by the DOHMH for cases involving EBLL in children under six. These responsibilities include prompt notifications, risk assessments, abatement work, and reporting.

Commissioner's Order to Abate (COTA) from DOHMH	
Indicators	**Metrics**
COTA received from DOHMH for children under six with EBLL	From January 2024 to January 31, 2025, 73 EBLL cases originated as a result of a COTA from DOHMH.
Notification to HUD following COTA	Out of the 73 EBLL cases, 67 required HUD notification within 5 business days. NYCHA met the requirement for 100% of the cases.
Abatement following COTA	NYCHA was required to complete abatement for 44 cases within 5 calendar days; 0 cases (0%) met this deadline requirement.
Report sent to DOHMH	NYCHA was required to submit clearance reports to DOHMH for 54 cases within 5 calendar days. NYCHA submitted clearance report to DOHMH for 100% of the cases.
Risk Assessment following COTA	NYCHA was required to perform risk assessments for 65 cases within 15 calendar days of receiving notification of EBLL. NYCHA performed risk assessments on time for 100% of the cases.

Commissioner's Order to Abate (COTA) from DOHMH	
Indicators	**Metrics**
Common Area Interim Control Work	NYCHA was required to perform common area interim control work for 65 cases within 30 calendar days. NYCHA performed common area interim control work for 98% of the cases within the required deadline.
Risk Assessment following COTA of other child-occupied units	NYCHA was required to perform risk assessments of other child occupied units for 56 cases within 60 calendar days of receiving notification of EBLL. NYCHA performed risk assessment for 68% (38) cases within required deadline.
Interim control work of other child occupied units	NYCHA was required to perform interim remediation of other child occupied units for 53 cases within 90 calendar days of receiving the risk assessment reports. NYCHA performed interim control work for 9 (17%) cases within the required deadline.

Understanding COTA data at NYCHA

Children living in NYCHA housing have, on average, a lower risk of lead exposure than those living in private housing. This difference is likely linked to the fact that much of the City's private housing is older than NYCHA-managed properties. In 2024, among children under six living in NYCHA housing, 13.3 per 1,000 tested had blood lead levels of 3.5 mcg/dL or higher. This rate is roughly 35% lower than both the overall citywide rate and the rate for children in private housing, which is 20.4 per 1,000 tested, respectively.[22]

From January 2024 to January 31, 2025, NYCHA received 73 COTAs from DOHMH relating to EBLL cases, of which 67 cases needed HUD notifications. These cases required prompt action under federal and local regulations, including HUD reporting, risk assessments, lead abatement, and interim control measures. NYCHA demonstrated consistent compliance in several key areas, such as notifying HUD within five business days for 100% of the 67 cases requiring notification and submitting clearance reports to DOHMH for 100% of the required cases within five calendar days.

In terms of abatement efforts, NYCHA was required to complete abatement within five calendar days for 44 cases. However, NYCHA did not meet the deadline for any of these cases. As discussed above in connection with HPD, factors such as lack of resident cooperation in permitting access to affected units can impact NYCHA's ability to meet required abatement

22 See DOHMH's Annual Report to New York City Council on Progress in Preventing Elevated Blood Lead Levels in NYC

timeframes. Upon receiving a COTA, NYCHA conducts comprehensive XRF testing and abates all identified positive components, going above the requirements of a COTA, ultimately making the unit lead-free with full abatement.

Additionally, because abatements require residents to relocate from their units during the work, it can be challenging to complete this process within the mandated 5-day window — even when residents are cooperative. NYCHA completed 100% (65) of the required risk assessments for common areas within 15 calendar days and completed 68% (38) of the required risk assessments of child-occupied units within 60 calendar days and performed common area interim control work within the 30-day deadline for 98% of the required cases. However, interim remediation of the other child-occupied units presented significant challenges, with NYCHA completing this work for only 17% (9 of 53) of the cases within the 90-day deadline.

NEW YORK CITY SCHOOLS (DOE)

DOE by the numbers in 2024

- 893 total DOE public school buildings identified for lead-based paint inspection
- 74 schools identified with lead hazards
- 218 classrooms with lead-based paint hazards
- 100% of affected classrooms successfully abated
- 3 inspections conducted annually per classroom
- 143,996 water fixtures tested across schools
- 8,655 fixtures tested positive for lead
- 100% of lead-positive water fixtures fully remediated
- Water fixtures are re-tested every 3 years to ensure ongoing safety

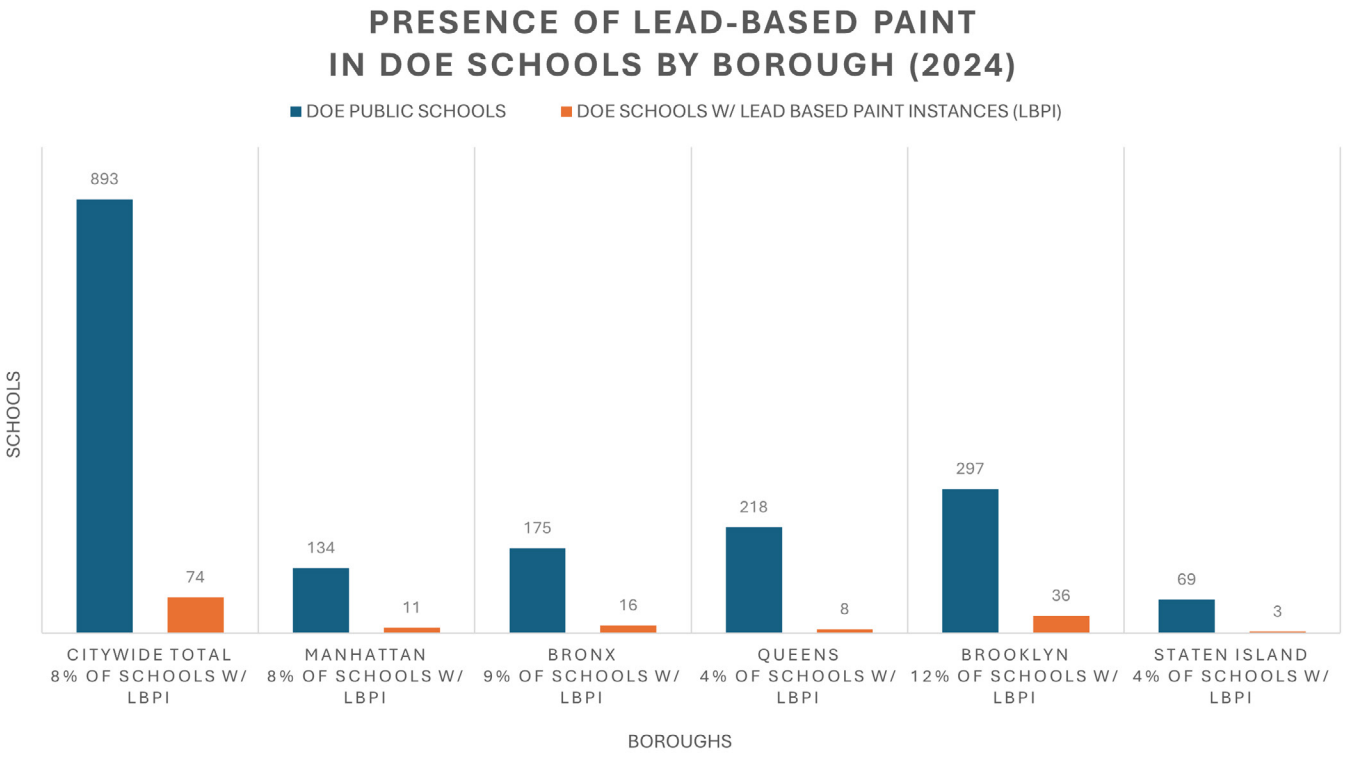
The Department of Education (DOE) actively monitors water quality and inspects for and remediates lead-based paint hazards as part of the LeadFree NYC initiative. DOE regularly surveys all infrastructure in city-owned schools containing lead-based paint and continues to address hazards through routine inspections, proactive maintenance, and the certification of staff engaged in paint-related work. These efforts focus extensively on spaces where children under six are regularly present, such as classrooms, libraries, auditoriums, cafeterias, gyms, and bathrooms.

In addition to lead-based paint protocols, the DOE adheres to New York State law, requiring water testing in all school facilities every three years. DOE tests every cohort fixture to meet the 5 parts per billion (ppb) lead threshold. This aligns with citywide water safety efforts led by DEP, which sets standards for water quality through continuous treatment, testing, and oversight. Despite the 1961 ban on lead service line installations, legacy lead service lines remain a concern in older infrastructure across the city. However, available records and previous assessments indicate that DOE school buildings are not supplied by lead service lines.

The DOE faces several challenges in achieving a lead-free NYC, particularly in addressing lead-based paint hazards and ensuring water safety in aging school infrastructure. The sheer scale of DOE's operations—monitoring over 1,600 schools across the city — makes inspections and remediation logistically difficult and resource-intensive. Managing the high volume of water testing and remediation further compounds DOE's operational challenges. As a practical example, during the 2018-2021 water testing cycle, DOE tested nearly 144,000 water fixtures across 1,622 school buildings, with 6% of fixtures requiring remediation due to elevated lead levels. The identified fixtures were immediately decommissioned, and the abatement process was initiated.

Inspection and remediation protocols for lead in schools

DOE implements a structured inspection and remediation protocol to address lead-based paint hazards in schools, with a focus on classrooms serving young children and common areas. Inspections begin with a visual survey to identify deteriorated paint. When deterioration is found, DOE conducts an XRF survey of all affected surfaces to determine whether the paint contains lead. Any identified lead-based paint instances are remediated immediately.



These inspections of classrooms and common spaces are conducted on a regular basis, with the results posted on their website. Appendix IV shows a DOE report of their Lead-Based Paint Testing Results in 2024. The chart above summarizes the data featured in the 2024 report, highlighting instances where lead-based paint was found, reported, and remediated in deteriorated paint across DOE schools during the 2024 school year. The data is broken down by borough, with Brooklyn public schools reporting the highest number of lead paint findings.

Inspection and Remediation Protocol for Lead in DOE Schools	
Indicators	**Metrics**
Inspection protocol for lead in classroom and common spaces	Classrooms (that serve children up to 6 years old) are inspected three times per year and common spaces are inspected once a year.
Standard Response Protocol	If lead-based paint is found from inspection, a standard response protocol is activated. In 2024, Custodian Engineers identified 450 (1.4%) rooms with deteriorated paint out of 32,477 rooms and common areas inspected from 893 buildings.
Presence of lead-based paint	Of the rooms with deteriorated paint, 218 (48%) tested positive for lead and required remediation in 74 buildings (8%) in 2024.
Remediation protocol	All 218 (100%) rooms were remediated in 2024.

Understanding inspection and remediation data

In 2024, DOE inspected 32,477 rooms and common spaces across 893 buildings. Classrooms serving children up to six years old were inspected three times annually, while common spaces were inspected once a year. Inspection results were made publicly available on the DOE website to support efforts of transparency to the public.

When lead-based paint is identified during these inspections, a standard response protocol is activated. In 2024, Custodian Engineers identified deteriorated paint in 450 rooms, representing 1.4% of inspected spaces. Of these, 218 rooms (48%) tested positive for lead-based paint, requiring remediation. These rooms were located in 74 schools, representing 8% of the total schools inspected.

Remediation efforts were effectively executed, as all 218 rooms with confirmed lead-based paint hazards were fully remediated.

Water safety protocols in schools

The DOE follows a water safety protocol to provide safe drinking water in schools, as mandated by state law. The previous testing cycle, covering the cohort from fall 2018 to spring 2021, involved testing 143,996 water fixtures across 1,622 school buildings at an action level of 15 ppb. The DOE is currently conducting a third round of water fixture testing, which began in 2023 and is projected to be completed in late 2025. The new action level for the new round of testing is 5 ppb, demonstrating DOE's proactive approach to identifying and addressing lead hazards in schools.

Water Safety Protocol in DOE Schools	
Indicators	**Metrics**
School water testing protocol	State law requires DOE to test the water in all schools for lead every three years. All schools have been tested from fall of 2018 to spring of 2021. (2022 and later years unavailable)
2018-2021 Cohort water testing	In 2018-2021 cohort, 143,996 water fixtures from 1,622 school buildings were tested.
2018-2021 Cohort water testing result	8,665 (6%) fixtures tested positive (in 1284 school building) for elevated lead in water out of 143,996 fixtures tested.
Elevated lead in water remediation protocol from 2018-2021 testing cohort	All of 8,665 (100%) fixtures that appear to have elevated lead in water were fully remediated.

Understanding water testing in DOE schools

This report focuses on data from the second round of water fixture testing conducted by the DOE, which took place from Fall 2018 to Spring 2021. During this period, the DOE tested 143,996 water fixtures across 1,622 school buildings as part of its water safety protocol. Of these fixtures, 8,665 (6%) across 1284 school buildings tested positive for elevated lead levels. In response, the DOE promptly followed its remediation protocol, successfully remediating 100% of the affected fixtures. Remediation efforts included replacing fixtures, conducting follow-up testing, and ensuring all water outlets met safety standards before being returned to service. As DOE is currently conducting a third round of water fixture testing, which began in 2023, early results of this preliminary testing indicate that ~7% of fixtures are above the new 5 ppb action level. This increase reflects the more stringent testing standard, not a decline in water quality. Overall, these efforts demonstrate DOE's commitment to providing safe drinking water across all school buildings.

Other Involved Agencies

DEPARTMENT OF SOCIAL SERVICES

DSS by the numbers in 2024

- 24 publicly-owned buildings were identified to be tested for lead-based paint
- 1,143 residential units were tested for lead-based paint
- 197 units tested positive for lead-based paint
- 100% of lead-positive units successfully abated

The Department of Social Services (DSS) is responsible for complying with all applicable lead laws at publicly-owned sites and for monitoring landlord compliance at privately-owned sites. Its portfolio includes both City-owned buildings operated by the Department of Homeless Services (DHS), or the Human Resources Administration (HRA) through third-party providers, as well as privately-owned units also managed by third-party contacted providers. While privately-operated units adhere to contractual reporting obligations, City-owned, and City-operated units, including Department of Homeless Services (DHS) shelters, Domestic Violence Shelters (DVS), and HIV/AIDS Services Administration (HASA) units are subject to direct oversight by DSS and HPD. To support citywide compliance, DSS convenes biweekly cross-agency meetings with HRA and DHS to set abatement goals, align strategies, and track progress.

DSS has completed lead testing in all publicly-owned units under its management and is now preparing to abate and test common areas, as required by Local Law 111. This effort is supported by contracts with EPA-certified vendors that utilize XRF testing. In parallel, DSS is developing internal metrics and enhancing policies and procedures to more effectively track inspection and remediation activities. The agency has conducted lead-related trainings for contracted providers and monitors the submission of lead compliance plans for privately leased buildings across its portfolio.

Lead Testing and Abatement in DSS City-Owned Buildings

DSS, through its oversight of DHS and HRA facilities, has made a concerted effort to conduct lead-based paint testing and abatement across its portfolio of City-owned buildings. From 2021 to 2024, DSS tested a total of 24 buildings, comprising of 1,143 units. Units where children were known to reside were prioritized for inspection and remediation.

Lead Testing and Abatement in DSS City-Owned Buildings	
Indicators	**Metrics**
Buildings tested for lead	From 2021 to 2024, DSS oversaw lead testing in a total of 24 buildings — 17 DHS and 7 HRA buildings.
Unit testing results	From 2021 to 2024, DHS tested a total of 1,143 units, with 17% (197 units) testing positive for lead. During the same period, HRA tested all 188 of its units, and all tested negative for lead.
Units abated	100% of DHS units that tested positive for lead, 197 units in total, were successfully abated.

Understanding lead testing in DSS City-Owned Buildings

Among the 1,143 units tested by DSS, 17% (197 units) were found to have lead-based paint, all of which have since been successfully abated. While testing and abatement have been completed for all city-owned units, DSS must now expand lead testing to the common areas of its facilities according to Local Law 111 of 2023. DSS has noted current challenges in securing certified vendors to conduct XRF testing in these spaces, with three contracts currently out for bid as of 2025.

At this time, tracking for lead testing is only available for city-owned buildings. DSS requires providers to submit lead testing and abatement plans and has offered online trainings on the dangers of childhood lead exposure, relevant local laws, and landlord responsibilities; however, reporting remains limited. In an effort to strengthen oversight, DSS has launched a Lead-specific mailbox to collect compliance documentation from providers, collaborated with HPD to establish a secure file exchange for the exemption and certification process, and continues to coordinate with DOHMH to identify sites that receive COTAs. Looking ahead, DSS plans to expand its data collection efforts to include testing and abatement of common areas in city-owned buildings as well as private landlord testing and exemption submissions to HPD.

DEPARTMENT OF BUILDINGS

DOB plays a critical role in preventing lead exposure by promoting compliance with its mandated safe work practices. Contractors must certify that individuals performing work that may disturb lead-based paint are properly certified before DOB issues construction permits. This certification and detailed information on lead-safe practices must also be included in the Tenant Protection Plan (TPP), which is submitted with the permit application and made available to tenants. DOB enforces compliance by conducting inspections, issuing Notice of Violations and, where necessary to protect residents, issuing stop work orders until the contractor cleans and is able to perform work safely.

To further promote compliance, DOB conducts interagency inspections in collaboration with DOHMH and the EPA to monitor construction activities. DOB also responds to referrals from DOHMH when it issues stop work orders due to unsafe practices involving lead hazards at permitted sites. Following inspections, DOB may take enforcement actions under the New York City Construction Codes, such as issuing stop work orders or violations for noncompliance with TPP requirements, reinforcing its commitment to minimizing lead exposure risks during construction.

DEPARTMENT OF PARKS AND RECREATION

The Department of Parks and Recreation (DPR) has been working closely with DOHMH and the EPA to test soil in park fields to address any potential contamination, including lead. Furthermore, as part of the 2019 LeadFree NYC plan, DPR tested over 3,500 outdoor drinking fountains to certify they are lead-free. If any fountain showed elevated lead levels above the federal threshold of 15 ppb, Parks would close it until remediation. They aim to return the fountains to full service as quickly as possible. As the water fountain testing progresses, DPR shares the results on their website. An interactive map allows the public to track the testing process and view the conditions of drinking fountains across the city (see Appendix V).

Continuing to Move the Needle

Government intervention, strengthened regulations, and public education have led to significant reductions in EBLL's citywide. During the Adams administration, these efforts were further accelerated through expanded testing, targeted enforcement, proactive remediation, infrastructure upgrades, and key legislative advancements.

The city is now nearing a turning point where interventions must focus more precisely on the root causes and sources of lead poisoning. The recommendations below, developed collaboratively through workshops with stakeholder agencies and the Mayor's Office of Risk Management and Compliance, offer a new wave of opportunities to prevent lead poisoning, with the north star of achieving zero cases of elevated blood lead levels. Taken together, these recommendations present opportunities to expand and scale the City's proven, multidisciplinary strategies. By applying these successful approaches consistently to the standards we have set, and across all impacted communities, the City can maximize the impact of its investments, strengthen protections for the most vulnerable children, and move closer to the ultimate goal of eliminating lead exposure entirely.

LEAD COMPLIANCE STRATEGY RECOMMENDATIONS AND NEXT STEPS

1. Prioritize Programs and Resources to Further Target High-Risk Sources
   The City will assess ways to further target and scale resources toward the most hazardous lead sources and vulnerable populations and close gaps of noncompliance — beginning with lead-based paint hazards, the most commonly identified cause of elevated blood lead levels in children. Agencies already have strong enforcement and remediation tools, but their impact is limited without the resources and expanded workforce needed to fully scale these programs. This could allow agencies, like HPD, to shift to a more proactive abatement approach and to further expand inspections and remediation in older housing stock and aging infrastructure.

2. Strengthen Cross-Agency Data Integration and Transparency
   Begin to design a centralized, real-time platform to integrate lead-related data from DOHMH, HPD, DEP, DOE, NYCHA, and DOB. This platform could track blood lead levels, inspections, violations, and remediation progress; include public-facing tools; and align agency standards. Improved data sharing offers opportunities to reduce delays, use resources more effectively, avoid agency overlap, and strengthen accountability.

3. Modernize and Align Local Laws to Improve Compliance
   Revisit outdated laws (e.g., Local Law 39 of 2021) to close gaps and remove barriers that delay remediation, especially in schools. Consider new legislation that would require private property owners to replace lead service lines at the point of sale or offered free replacement by the City. Standardize safety requirements across public, charter, and private schools. Finally, educating and preparing newly elected officials and city council members on lead hazards and the need for local law compliance support is critical to future progress.

4. Expand Resident-Friendly Inspection Access and Engagement
   Create more opportunities to offer flexible inspection schedules (evenings/weekends) and improve customer service. Expand education campaigns with multilingual outreach materials, tenant rights resources, and public messaging to increase blood lead testing and awareness in high-risk areas. Build on past DOHMH campaigns and partner with doctors, daycares, and community groups to reach families.

5. Launch Targeted Public Awareness Campaigns in High-Risk Areas
   Building on DOHMH's past successful campaigns, the City can relaunch and expand public messaging to encourage regular childhood blood lead testing and to highlight lead risks — especially in neighborhoods and boroughs with the highest EBLL rates. Using subway ads, local media, and digital tools, these campaigns should emphasize the health impact of lead and publicize city services available to help.

CONCLUSION

Government authorities and legislative action have effectuated sharp declines in lead poisoning over the last 20+ years. Since Local Law 1 took effect in 2004, the establishment of COTAs has driven significant progress in eliminating lead poisoning and demonstrated the power of effective government intervention. While issues remain, the next tranche of lead poisoning prevention initiatives needs to come with a smaller, sharper scalpel that focuses on a targeted approach to testing, identifying hot spots to focus on known problematic places. Unfortunately, lead poisoning, while a problem that money and time can solve, is often found in areas where money is not readily available and time is hard to come by; whether it be financially strapped property owners, or residents who cannot make the time to allow inspectors in, abating lead is expensive, time-consuming, and is a burden on tenants who must relocate while abatement activities proceed. It is time for a measured, more specific approach to removing the last of lead hazards from New York City's housing stock and infrastructure.

APPENDICES:

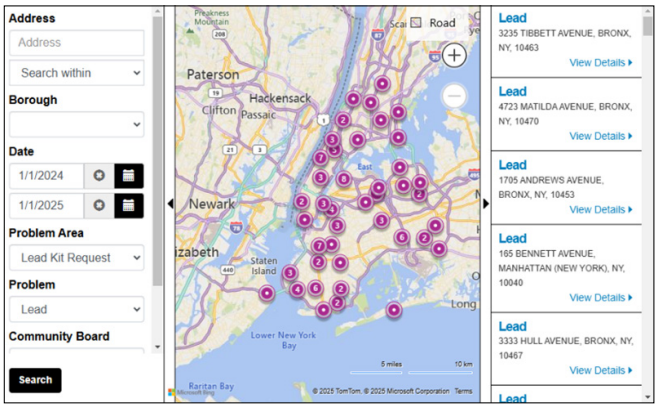
Appendix I- Table 1: Guide to Acronyms and Key Definitions

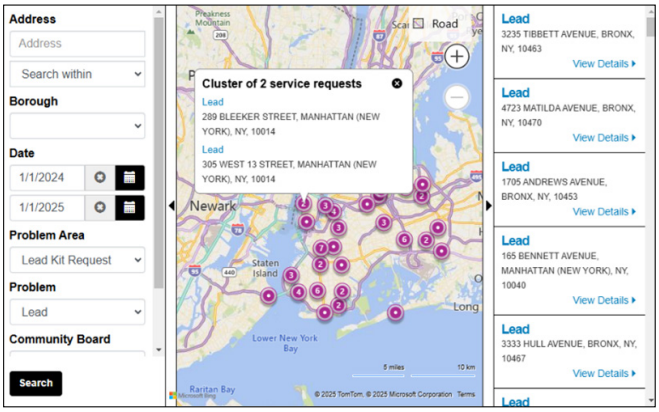
APM	HPD's Asset and Property Management
BLI	Building Lead Index
CDC	United States Center for Disease Control and Prevention
COTA	Commissioner's Order to Abate
DEP	Department of Environmental Protection
DHS	Department of Homeless Services
DOB	Department of Buildings
DOE	Department of Education
DOHMH	Department of Health and Mental Hygiene
DPR	Department of Parks & Recreation
DSS	Department of Social Services
EH Data Portal	NYC's Environmental & Health Data Portal by DOHMH
EPA	US Environmental Protection Agency
ERP	HPD's Emergency Repair Program
FY	Fiscal Year
HHS	US Department of Health and Human Services
HLD	HPD's Housing Litigation Division
HPD	Department of Housing Preservation and Development
HRA	Human Resources Administration

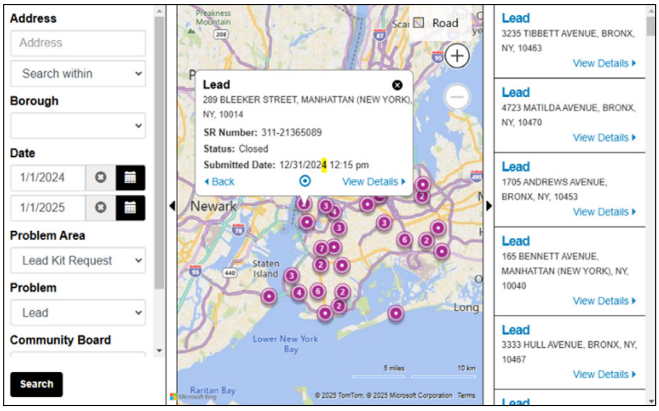
HUD	US Department of Housing and Urban Development
LCRI	EPA Lead and Copper Improvement Rule
LHCD	NYCHA's Lead Hazard Control Department
LSLRP	New York State Lead Service Line Replacement Plan
NYCHA	New York City Housing Authority
PACT	NYCHA's Permanent Affordability Commitment Together Program
SDNY	United States Attorney for the Southern District of New York
TEMPO	NYCHA's Team for Enhanced Management Planning and Outreach
TPP	Tenant Protection Plan
UHF	United Hospital Fund Neighborhoods
XRF	X-Ray Fluorescence
Child Under 6 (CU6) apartments	An apartment where a child 5 year old or younger lives or routinely spends 10 or more hours per week.
Elevated Blood Lead Level	Elevated blood lead level means a confirmed concentration of lead in whole blood of a child under age 6 equal to or greater than the concentration in the most recent guidance published by the U.S. Department of Health and Human Services (HHS) on recommending that an environmental intervention be conducted. The current EBLL standard is greater than 3.5 µg/dl or greater.
Emergency Repair	An emergency repair occurs when a residential owner, particularly a landlord, fails to meet HPD's deadlines for addressing any lead hazards identified during inspections. If the landlord does not comply after three notices, HPD sends a contractor to perform necessary work, such as lead abatement, remediation, or lead dust wipe clean-up. The landlord is then billed for these services.

Environmental Investigation	Once a child has an EBLL greater than or equal to 3.5 µg/dL, an environmental investigation is conducted to identify and address sources of lead exposure, which includes a detailed risk assessment, home inspection, and potentially testing for lead in consumer products and soil.
Interim Control	Set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards. Interim controls include, but are not limited to, repairs, painting, temporary containment, specialized cleaning, clearance, ongoing lead-based paint maintenance activities, and the establishment and operation of management and resident education programs.
Lead Abatement	Any measure or set of measures designed to permanently eliminate lead-based paint hazards. Abatement includes, but is not limited to: the removal of paint and dust, the permanent enclosure or encapsulation of lead-based paint, the replacement of painted surfaces or fixtures, or the removal or permanent covering of soil, when lead-based paint hazards are present in such paint, dust or soil.
Local Law 1	Local Law 1 of 2004 requires landlords to identify and fix lead paint hazards in the apartments of young children. This law applies to apartments if the building was built before 1960 (or between 1960 - 1978 if the owner knows that the building has lead paint), the building has 3 or more apartments, and a child under the age of 6 lives in the apartment.
Risk Assessment	An on-site investigation to determine the existence, nature, severity, and location of lead-based paint hazards; and the provision of a report by the individual or firm conducting the risk assessment explaining the results of the investigation and options for reducing lead-based paint hazards.
Visual Assessment	Visual assessment means looking for, as applicable: (1) Deteriorated paint; (2) Visible surface dust, debris, and residue as part of a risk assessment or clearance examination; or (3) The completion or failure of a hazard reduction measure.

Appendix II- 311 Service Requests







Source: 311 Service Requests from 2010 to Present

311's Service Request Map allows for queries into Lead Kit Requests by city residents, spatially visualizing what neighborhoods have been requesting kits. The status and key dates of the requests are also included in the details of the mapped data points, allowing residents to follow along the progress of their requests, including knowing when testing kits were mailed out and when their test results will be ready. In 2024, 77 lead test kits have been requested through 311.

Appendix III- Lead Service Line Map (2024)

The interactive web-based Lead Service Line Map was created by the Department of Environmental Protection to allow NYC residents to identify if their property has a lead service line in their area which connects to their home. The map enables residents to take precautions and be proactive in testing their water quality.

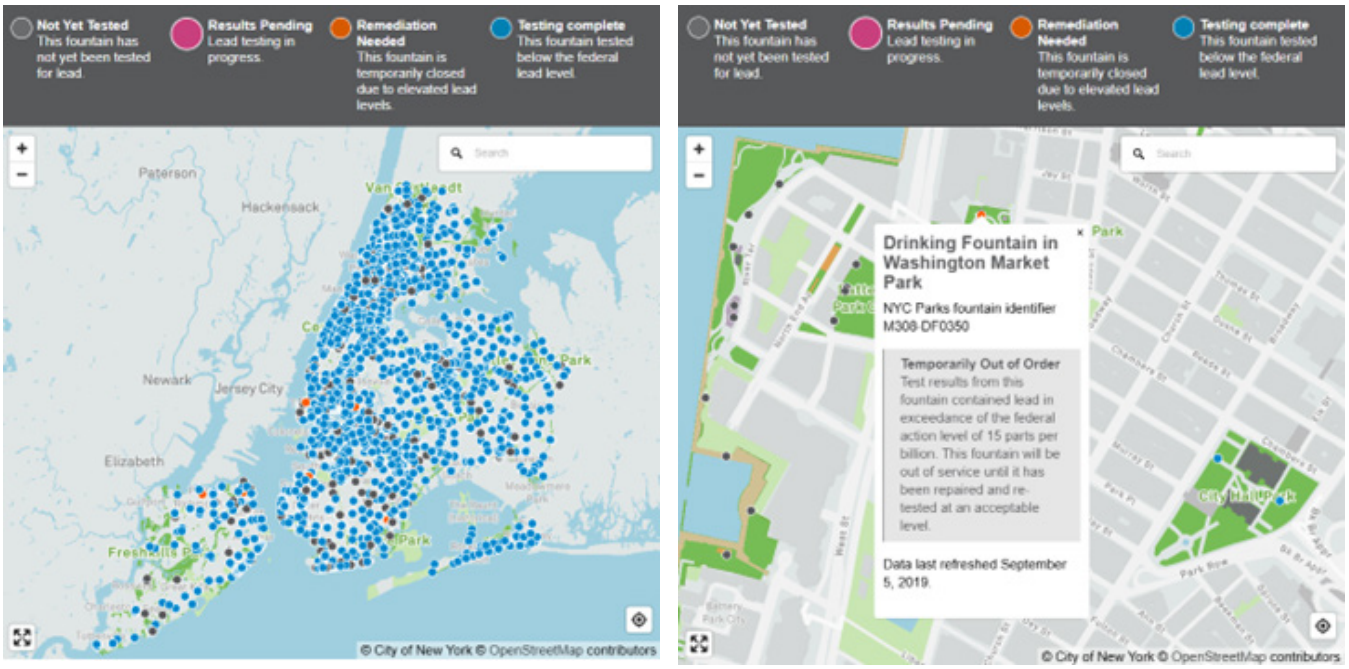
Appendix IV- DOE Lead Based Paint Testing Results: 2024 Cohort 1 Results

BOROUGH	BUILDING NAME	BUILDING ADDRESS	ROOM	DETERIORATED PAINT	PRESENCE OF LBP IN DETERIORATED PAINT	REMEDIATION REQUIRED	REMEDIATION COMPLETE
BROOKLYN	P.S. 11 - BROOKLYN	419 WAVERLY AVENUE	202	YES	YES	YES	YES
BROOKLYN	P.S. 29 - BROOKLYN	425 HENRY STREET	201 BR	YES	YES	YES	YES
BROOKLYN	P.S. 29 - BROOKLYN	425 HENRY STREET	202 BR	YES	YES	YES	YES
BROOKLYN	P.S. 29 - BROOKLYN	425 HENRY STREET	300	YES	YES	YES	YES
BROOKLYN	P.S. 29 - BROOKLYN	425 HENRY STREET	302 BR	YES	YES	YES	YES
BROOKLYN	P.S. 29 - BROOKLYN	425 HENRY STREET	310 BR	YES	YES	YES	YES
BROOKLYN	P.S. 29 - BROOKLYN	425 HENRY STREET	402 BR	YES	YES	YES	YES
BROOKLYN	P.S. 29 - BROOKLYN	425 HENRY STREET	502 BR	YES	YES	YES	YES
BROOKLYN	P.S. 54 - BROOKLYN	195 SANDFORD STREET	101 BR	YES	YES	YES	YES
BROOKLYN	P.S. 54 - BROOKLYN	195 SANDFORD STREET	105 BR	YES	YES	YES	YES
BROOKLYN	P.S. 54 - BROOKLYN	195 SANDFORD STREET	512A BR	YES	YES	YES	YES
BROOKLYN	P.S. 73 - BROOKLYN	251 MACDOUGAL STREET	CAF	YES	YES	YES	YES
BROOKLYN	P.S. 124 - BROOKLYN	515 4 AVENUE	108	YES	YES	YES	YES
BROOKLYN	P.S. 155 - BROOKLYN	1355 HERKIMER STREET	BOYS BASEMENT BR	YES	YES	YES	YES
BROOKLYN	P.S. 155 - BROOKLYN	1355 HERKIMER STREET	cafeteria	YES	YES	YES	YES
BROOKLYN	P.S. 157 - BROOKLYN	850 KENT AVENUE	508	YES	YES	YES	YES
BROOKLYN	P.S. 157 - BROOKLYN	850 KENT AVENUE	GIRLS 5th Floor BR	YES	YES	YES	YES
BROOKLYN	P.S. 158 - BROOKLYN	400 ASHFORD STREET	211	YES	YES	YES	YES
BROOKLYN	P.S. 167 - BROOKLYN	1025 EASTERN PARKWAY	354 BR	YES	YES	YES	YES
BROOKLYN	P.S. 167 - BROOKLYN	1025 EASTERN PARKWAY	403	YES	YES	YES	YES
BROOKLYN	P.S. 174 - BROOKLYN	574 DUMONT AVENUE	5402 BR	YES	YES	YES	YES
BROOKLYN	P.S. 179 - BROOKLYN	202 AVENUE C	104	YES	YES	YES	YES
BROOKLYN	P.S. 179 - BROOKLYN	202 AVENUE C	Cafeteria Boys BR	YES	YES	YES	YES
BROOKLYN	P.S. 184 - BROOKLYN	273 NEWPORT STREET	1ST FLOOR GIRLS BR	YES	YES	YES	YES
BROOKLYN	P.S. 184 - BROOKLYN	273 NEWPORT STREET	303	YES	YES	YES	YES
BROOKLYN	P.S. 184 - BROOKLYN	273 NEWPORT STREET	3RD FLOOR BOYS BR	YES	YES	YES	YES
BROOKLYN	P.S. 184 - BROOKLYN	273 NEWPORT STREET	4TH FLOOR GIRLS BR	YES	YES	YES	YES
BROOKLYN	P.S. 186 - BROOKLYN	7601 19 AVENUE	2ND FLOOR BATHROOM BR	YES	YES	YES	YES
BROOKLYN	P.S. 186 - BROOKLYN	7601 19 AVENUE	302	YES	YES	YES	YES
BROOKLYN	P.S. 200 - BROOKLYN	1940 BENSON AVENUE	122 BR	YES	YES	YES	YES
BROOKLYN	P.S. 200 - BROOKLYN	1940 BENSON AVENUE	160 BR	YES	YES	YES	YES
BROOKLYN	P.S. 200 - BROOKLYN	1940 BENSON AVENUE	459 BR	YES	YES	YES	YES
BROOKLYN	P.S. 316 - BROOKLYN	750 CLASSON AVENUE	108	YES	YES	YES	YES
MANHATTAN	P.S. 3 - MANHATTAN	490 HUDSON STREET	209	YES	YES	YES	YES
MANHATTAN	P.S. 3 - MANHATTAN	490 HUDSON STREET	211	YES	YES	YES	YES
MANHATTAN	P.S. 3 - MANHATTAN	490 HUDSON STREET	412 BR	YES	YES	YES	YES
MANHATTAN	P.S. 63 - MANHATTAN	121 EAST 3 STREET	CAF	YES	YES	YES	YES
MANHATTAN	P.S. 63 - MANHATTAN	121 EAST 3 STREET	CAF2	YES	YES	YES	YES
MANHATTAN	P.S. 63 - MANHATTAN	121 EAST 3 STREET	Near 219 BR	YES	YES	YES	YES
MANHATTAN	P.S. 98 - MANHATTAN	512 WEST 212 STREET	312 GIRLS BR	YES	YES	YES	YES
MANHATTAN	P.S. 102 - MANHATTAN	315 EAST 113 STREET	CAF	YES	YES	YES	YES
MANHATTAN	P.S. 115 - MANHATTAN	586 WEST 177 STREET	311	YES	YES	YES	YES
MANHATTAN	I.S. 118 - MANHATTAN	154 WEST 93 STREET	113 BR	YES	YES	YES	YES
MANHATTAN	P.S. 166 - MANHATTAN	132 WEST 89 STREET	203B BR	YES	YES	YES	YES
MANHATTAN	P.S. 166 - MANHATTAN	132 WEST 89 STREET	514 BR	YES	YES	YES	YES
MANHATTAN	P.S. 527 - East Side School for Social Action	323 EAST 91 STREET	G05 BR	YES	YES	YES	YES

Source: NYC Public Schools, Lead-based Paint Safety.

The yearly reports put out by DOE identify all classrooms, whether there was observation of peeling paint, and if there was, standard response protocol followed. Please note that in the chart, LBP means "lead-based paint." Abatement is part of the standard response protocol.

Appendix V- DPR LeadFreeNYC: Drinking Fountains



Source: DPR, health and safety in NYC Parks, 2019.

DPR has created an interactive map that allows NYC residents to track the lead testing progress and view site conditions of their local parks. The process of public open data allows for more transparency, public assurance, and a visual aid to see where remediation is needed.

October 2025

ACKNOWLEDGMENTS AND CONTRIBUTORS

This report was prepared by the **Mayor's Office of Risk Management and Compliance** with input and support from staff across City agencies. We thank all agency partners and contributors for their collaboration, data, and expertise in advancing the City's efforts to eliminate lead exposure and protect public health.

Mayor's Office of Risk Management & Compliance

- Tasrina Bari
- David Feldman
- Doug Giuliano
- Steven Kaiser
- Jean-Claude LeBec
- Erin Pilnyak
- Julian Ross
- Leyla Wahedi

Department of Health and Mental Hygiene (DOHMH)

- Yma Andries
- Andrew Faciano
- Corrine Schiff

Department of Housing Preservation and Development (HPD)

- Lizar Alexander
- AnnMarie Santiago

Department of Environmental Protection (DEP)

- Janet Aristy
- Chelsea McDermott Cawley
- Lori Emery
- Salome Freud
- Julie Herzner
- Anna Ponting
- Kaitlyn Richter

New York City Housing Authority (NYCHA)

- Matthew Charney
- Shireen Riazi Kermani
- Karolina Paruch-Kozlowski

- Jaclyn Sullivan
- Cassiah Ward

Department of Education (DOE)

- Mohamed Hemida
- Kevin Moran
- Saritha Thuma

Department of Social Services (DSS)

- Carol David
- Todd Hamilton
- Patrick Murphy
- Marlowe Paraiso