

Report to the City Council: The Department of Housing Preservation and Development's (HPD) Self-Closing Door (SCD) Proactive Program (July 2024 through June 2025)

Housing Maintenance Code § 27-2041.2 (e) requires HPD to submit to the Mayor and the Speaker of the City Council an annual report on the Department's proactive program to inspect self-closing doors. This report is being submitted in compliance with this requirement.

I. Background

Residential multiple dwelling buildings (with 3 or more residential units) are required to be equipped with self-closing doors pursuant to section 28-315.10 of the Administrative Code of the City of New York. Apartment and common area doors in multiple dwellings are required by law to swing closed and latch after being opened and released (self-closing) to limit the spread of fire and smoke. In accordance with § 27-2041.1 of the Housing Maintenance Code, it is the duty of the owner to keep and maintain such doors in good repair.

The Department of Housing Preservation and Development (HPD) enforces this requirement through the issuance of violations based on inspections of these doors. As part of HPD's standard inspection protocol, whenever a self-closing door (SCD) violation is issued, HPD inspectors post notices to tenants in each building to let tenants know HPD issued at least one SCD violation in the building and highlighting the importance of SCDs. The notice includes information on how to check the doors to ensure they are working properly, direction that tenants should report malfunctioning SCDs to the building owner or property manager and, if the doors are not fixed, report the condition to HPD through 311. Violations mailed to property owners also include information on how to ensure that the doors are properly functioning.

Pursuant to Local Law 71 of 2022, passed in the wake of the Twin Parks fire in the Bronx that led to multiple fatalities, HPD was tasked with creating a program to identify buildings at high risk of fire fatality for proactive inspection. The list of the 300 multiple dwellings for proactive inspection was derived using criteria such as:

- Prior tenant complaints for inoperable self-closing doors and for inadequate heat.
- Prior violations issued by the Department of Buildings (DOB) for violations related to fire safety systems or for failure of the owner to file annual boiler inspection reports.
- Any indicators suggesting that the building may pose higher than average risk for fire fatalities as determined in consultation the Fire Department. HPD began the proactive inspections of SCDs at apartment entrances and in common areas in September 2023 in 300 multiple dwellings, and selected another 300 multiple dwellings in October of 2024.

Program Implementation

HPD enacted various procedural and operational changes, and coordinated with partner agencies to facilitate program implementation:

- HPD codified Subchapter P of Chapter 25 of Title 28 of the Rules of the City of New York, establishing formal criteria for building selection.
- HPD collaborated with the Department of Buildings (DOB) and the Fire Department (FDNY) for the compilation of the list of 300 buildings. The selection of buildings placed on this list was based on specific criteria included in the Rules.
- HPD completed modifications to internal software applications to track inspections and manage violations.
- Inspection protocols were established by HPD and documented in manuals and other training resources for inspectors.
- To facilitate completion of inspections at certain buildings, HPD leveraged FDNY resources. Joint FDNY and HPD inspections were conducted at three buildings in FY 24 and two buildings in FY25 because property management personnel were unwilling to provide access to HPD for inspection.

II. Criteria and Building Selection

Criteria

The criteria for selection of buildings are that the building must have more than six dwelling units and must meet at least one of the following four (4) conditions:

- (1) Buildings with at least one complaint on record with the Department regarding a self-closing door within the three years prior to selection.
- (2) Buildings with more than five heat complaints on record with the Department in each of the three heat seasons prior to selection.
- (3) Buildings with at least one fire-safety related violation issued by the Department of Buildings within the three years prior to selection; or
- (4) Buildings that have failed to file an annual boiler report with the Department of Buildings, where applicable, within the three years prior to selection.

Buildings excluded from selection include:

- A multiple dwelling that is currently the subject of a court order appointing or a proceeding brought by the Department seeking the appointment of an administrator pursuant to article 7-A of the real property actions and proceedings law.
- A multiple dwelling that has been included in the Alternative Enforcement Program (AEP) pursuant to section 27-2153 of the administrative code and has not been discharged from such program.
- A multiple dwelling that is currently active in and is the subject of an order under the Underlying Conditions (UC) Program.
- A multiple dwelling that has been inspected by the Department under the annual SCD inspection program provided in these rules within the last five years; or

- A multiple dwelling that has had an inspection of a public part, as defined in administrative code §27- 2004(20), by the Department within the three years preceding selection for inspection, including, but not limited to, such inspections conducted by specialized enforcement program units within the Department.

Building Selection

The Department prioritized selection of buildings meeting the criteria which were built prior to 1999. Additional prioritization for selection was applied based on consultations with the FDNY.

The final selection included buildings in all boroughs and across building size and type.

Distribution by borough - FY25

	Manhattan	Bronx	Brooklyn	Queens	Staten Island	TOTAL
Buildings	93	110	93	3	1	300
Units	4,549	6,870	4,833	130	141	16,523
Minimum building size (units)	6	7	6	6	6	
Median building size (units)	43	58.5	48	43	6	
Maximum Building size (units)	250	312	180	81	6	
Buildings > 100 Units	9	9	10	0	0	

Selection Criteria - FY25

	Total	Percent of Total
Complaints Only	201	67%
SCD Complaints Only	36	12%
Missing Boiler Report, + Complaints	32	11%
DOB Fire Safety Violations, + Complaints	68	22%

Additionally, the majority (71%) of the buildings selected met two of the criteria, with most of this subset (66%) having both self-closing door complaints and heat complaints. 28% of the buildings selected fit one of the criteria, of which self-closing door complaints were most common. 2% of the buildings selected fit three of the criteria, with self-closing door complaints, heat complaints, and DOB fire safety violations issued.

III. Owner Notification

Once buildings were selected, HPD sent notices to the owners or agents of selected buildings via mail. Emails were also sent to property owners if email addresses were provided at the time of registration. Notice was sent to the person(s) identified in the most current Property Registration on file with HPD.

The notice encouraged owners to ensure that all doors in common areas and at apartment entrances were properly self-closing and fireproof, prior to HPD's inspections. It advised the property agent/owner that a full building inspection was going to be conducted specifically to check for these conditions.

Owners were reminded to test the doors using the following checklist, included in the notice to owners about selection:

- Does the door swing fully shut and close completely after being opened fully?
- If there is a latch, does it engage?
- Note any underlying condition or obstruction that prevents the self-closing door from operating properly.
- Door needs refitting - there is a large gap at the bottom of the apartment door?
- Defective closing mechanism?
- Device or item holding, or capable of holding, the door open
- Is there any damage to the self-closing mechanism?
- Are the hinges intact, or are they loose or missing?

Property owners were alerted about planned SCD proactive inspections. Afterwards, if gaining access to a building was problematic, HPD attempts to schedule inspection dates with property owners or their representatives. This approach has been largely successful, and most property owners are cooperative.

IV. Proactive Inspections

The SCD program inspectors attempt to inspect all doors in buildings selected for proactive inspections including common areas, public areas, hallways, corridors, and all apartment doors, where accessible.

From October 2024 through the end of May 2025, HPD inspected 300 buildings (mostly in the Bronx; table with city-wide totals above) containing approximately 16,725 apartments and 3,999 doors in the public areas, totaling 20,724 doors. With an almost 50% access rate to doors in apartments and public areas, inspections of 9,654 doors were completed and about 70% of doors inspected were found to be in proper working order. The inspections resulted in the issuance of 2,937 self-closing door violations by HPD. All but 11 of the buildings inspected resulted in issuance of at least one SCD violation. 51% (1,622) of the 3,151 violations issued were in buildings with ≥ 100 units.

Inspection results: Access

Apartment Doors		
Total Apartments	Total Apartments No Access	Total Apartment Doors Inspected
16,725	10,570	6,155

Public Area Doors		
Total public area doors	Total no access doors in the public area	Total public area doors inspected
3,999	500	3,499

Inspection results: Proper Working Order

Borough	Apartment doors inspected and in proper working order	Public area doors inspected and in proper working order
MN	1,206	821
BX	1,368	1,213
BK	1,469	590
QN	30	10
SI	50	8
Total	4,123	2,642

Inspection results: Violations issued for malfunctioning/missing self-closing doors

By location

Apartment Doors	Public Area Doors	Total Doors
2,033	904	2,937

By borough

Borough	Violations issued	% of violations	Building Count
MN	815	28%	93
BX	1,356	46%	110
BK	728	25%	93
QN	34	1%	3
SI	4	<1%	1
Total	2,937	100%	300

Compliance

For the most part, property owners/managing agents acted quickly to correct violations for SCDs issued during the proactive inspections. Of the 2,937 violations issued for malfunctioning self-closing doors, nearly 75% (2,221) were certified as corrected by property owners by the deadline specified, which is higher than the approximately 50% of SCD violations certified after being issued by HPD as a result of all inspections.

For the 2024-2025 round of the SCD program, HPD implemented additional outreach. In the event that 10 or more violations were issued during a proactive inspection, HPD made follow up calls to the owners or managing agents to inform them of the upcoming mailed Notices of Violation. This ensured that the owners or agents would be prepared for the correction and certification process, and served as an opportunity for further education and communication. Overall, the calls were received positively, and may have contributed to the high compliance rate.

Owner Compliance by Borough

Borough	Violations issued	Corrected by owner	% of Total
MN	815	595	73%
BX	1,356	1,042	77%
BK	728	562	77%
QN	34	22	65%
SI	4	0	0%
Total	2,937	2,221	75%

HPD attempts to reinspect all SCD violations when the deadline for the correction of the conditions has passed, whether the owner has certified correction or not. When violating conditions are found to be not corrected, the HPD's Emergency Repair Program (ERP) initiates emergency work orders and directs contractors to correct the immediately hazardous condition if they are able to gain access to the door in violation.

V. Program Assessment

HPD successfully carried out the SCD proactive inspection program for an additional 300 multiple dwellings, for a total of 600 inspected in the program overall since the program's inception. Program results are generally positive. Although nearly all the buildings inspected were issued at least one SCD violation (289 buildings were issued a SCD violation during proactive inspections in FY25), inspectors found most of the inspected doors (approximately 70%) to be properly operating: self-closing and latching.

Of the 2,937 SCD violations issued during proactive inspections, owners certified correction of ~76% of the time. This rate of violation certification far exceeds the certification of SCD violations noted during Calendar Year (CY) 2023 which totaled approximately 52% (from the Report to the City Council: Audits of Certification of Correction CY 2023). This suggests that the notice provided to owners about planned proactive inspections elicited better response and compliance.

Comparison of FY24 and FY25: Inspections, Violations and Compliance

	FY24	FY25
Total Doors Inspected	10,279	9,654
Apartment Doors	7,234	6,155
Public Area Doors	3,045	3,499
Total Violations	3,151	2,937
Apartment Violations	2,118	2,033
Public Area Violations	1,033	904
Total Violations Closed	2,507	2,348
Violations Closed by Owner	2,336	2,221
Violations Closed by HPD	164	119

Comparison of FY24 and FY25: Percent Compliance

	FY24	FY25
% of Doors in proper working order at time of inspection	71%	70%
% of violations closed by Owner	74%	76%

Comparison between the two years of SCD program implementation shows a consistent percentage of compliance prior to inspection, which again speaks to the efficacy of the owner notice and its instructions, and a slightly improved rate of compliance after the issuance of a violation.

VI. Next Steps

During FY26, HPD will:

- Finalize new list of 300 buildings designated for proactive inspection and conduct inspections.
- Contact corresponding property owners/managers and provide notice about building selection and upcoming proactive inspections.
- Track disposition of SCD violations issued during proactive inspections.

Additionally, HPD will continue analysis of program outcomes to determine both identify if any changes are needed to the criteria for selection and well as review the impact on participating buildings.

By combining enhanced enforcement with our regular enforcement of self-closing door requirements, education about self-closing doors, the safe use of space heaters, the importance of smoke detectors, and the dangers of lithium-ion batteries, HPD and other City agencies are working together to help tenants keep safe.