



# What to Know for Cycle 10 of the NYC Facade Inspection and Safety Program

*This year marks the start of a new five-year filing cycle for New York City's Facade Inspection and Safety Program (FISP). Fortunately, Cycle 10 presents building owners few new hurdles, and even offers relief to owners who may have fallen behind.*

## FISP Refresher

Preceded only by Chicago's 1978 law, which was later repealed, New York's facade initiative is one of the oldest and most robust in the nation. Launched with Local Law 10 of 1980, the rule was substantially updated in 1998 with Local Law 11, a moniker for the program that persists today, despite subsequent local laws that introduced further refinements.

A spate of accidents prompted new requirements for balcony and railing inspections in Cycles 7 and 8, as well as increased scrutiny of terra cotta facade elements. Staggered sub-cycles were introduced in Cycle 7 to help the City cope with the increasing volume of covered buildings (around 12,500 when the law was passed in 2007, and more than 16,000 today). Cycle 9 saw major changes, including new requirements for close-up inspections and cavity wall probes, along with more stringent penalties for noncompliance.

The essentials of the law remain largely intact. Under [1 RCNY §103-04](#), owners of buildings greater than six stories in height are required to file a *Critical Examination Report* evaluating the condition of facades and appurtenances with the New York City Department of Buildings (NYC DOB) every five years. Reports are due within two-year [sub-cycles](#) based on the last digit of the building's block number. For Cycle 10, the sub-cycle filing windows are as follows:

NYC Facade Inspection and Safety Program – Cycle 10		
Sub-cycle	Last digit of block number	Filing period
10A	4, 5, 6, 9	21 Feb 2025 – 21 Feb 2027
10B	0, 7, 8	21 Feb 2026 – 21 Feb 2028
10C	1, 2, 3	21 Feb 2027 – 21 Feb 2029

Not sure of a building's block number? The [DOB NOW Portal](#) has this information available to the public, along with past FISP and other compliance filings, violations, and additional records.

Each cycle, a *Qualified Exterior Wall Inspector (QEWI)* certified by the NYC DOB must oversee the Critical Examination and determine whether the exterior wall assemblies are [Safe, Unsafe, or Safe with a Repair and Maintenance Program \(SWARMP\)](#). A condition that will require repair or maintenance within the next five years is considered SWARMP, unless it requires remediation within a year, in which case it must be deemed Unsafe.

## Owners who failed to file in Cycle 9 may file early in Cycle 10, an opportunity to limit penalties and resume compliance.

Note that the same condition at the same location cannot be classified as SWARMP in consecutive filing cycles. If it was SWARMP in Cycle 9 and hasn't been corrected, it will be considered Unsafe in Cycle 10.

The QEWI must alert the owner and the NYC DOB of any Unsafe conditions immediately, along with recommended measures to stabilize the area and protect public safety. The owner must then promptly take action to follow these safety measures, with public protection remaining in place until the condition is resolved and an amended Safe or SWARMP report is filed and accepted. For SWARMP conditions, the QEWI is tasked with determining the appropriate timeframe for recommended repairs.

Beginning with Cycle 9, the Critical Examination must include *Close-Up Inspections* at least every 60 feet along the facade, covering its full height and using scaffolding or other observation platform. In 2021, the rule was [updated](#) to clarify that buildings which do not front a public right-of-way need only undergo Close-Up Inspections at a representative sample of elevations, with at least one per building. It's up to the QEWI to determine which areas of the facade pose the greatest potential hazards, and to perform the physical examinations there.

(Continued next page)



NEW YORK	462 Seventh Avenue, 20th Floor, New York NY 10018	212 789-9915	www.hoffarch.com
CONNECTICUT	265 Church Street, 16th Floor, New Haven CT 06510	203 239-6660	
WASHINGTON DC	277 S Washington Street, Suite 210, Alexandria VA 22314	703 253-9800	



Also starting in Cycle 9, probes are now required for all cavity wall construction in at least every odd-numbered cycle. That means owners who underwent the disruption and expense of probes in the last cycle can likely skip it this time around, unless the QEWI observes a new or worsening condition that warrants exploratory openings.

Since Cycle 8, guards and railings for balcony and terrace enclosures must be inspected as part of the FISP Critical Examination to evaluate whether their components are positively secured against movement. In Cycle 7, this assessment constituted a separate, supplemental report, but the [balcony enclosure evaluation](#) has since been incorporated into the standard FISP Critical Examination Report.

Within 60 days of completing the Critical Examination, the QEWI files a Critical Examination Report through the [DOB NOW: Safety](#) portal, categorizing the building as Safe, Unsafe, or SWARMP. The specifics of the report contents and organization are detailed in 1 RCNY §103-04; failure to follow these directives could result in rejection of the report.

**All Unsafe conditions must be corrected within 90 days of filing the report.** It's possible to request an extension, but it requires documentation and must be approved by the NYC DOB.

## Parapet Observations

In January 2024, the NYC DOB introduced a requirement for [Annual Parapet Observation](#), which applies to all buildings in the city, regardless of height. (In contrast, FISP applies only to buildings greater than six stories tall.) Rather than file the report with the NYC DOB as with FISP, owners instead retain Annual Parapet Observation reports for at least six years, making them available to the NYC DOB if requested.

Bundling parapet observation together with the FISP Critical Examination saves building owners the expense of duplicate efforts. Provided that the FISP report includes all information needed to satisfy the Annual Parapet Observation requirements, no separate parapet report for that year is required. Owners just need to keep a copy of the FISP report with their other parapet reports so it's available upon request. Bear in mind that Parapet Observation is required annually and so requires a separate report in years when a FISP report isn't filed.

## Catch-Up Early Filing for Missing Cycle 9 Reports

Building owners who are behind on FISP report filing have an opportunity to break the cycle of accumulating civil penalties through a new program that allows for [early filing](#). Rather than wait for their designated sub-cycle while facing years of compounding penalties, owners who never filed a Cycle 9 report can apply to file early in Cycle 10. After a Sub-Cycle Override is approved, the owner of a building with "No Report Filed (NRF)" status in Cycle 9 can return to full compliance by paying all existing civil penalties and filing a report in Sub-Cycle 10A.

## Public Shaming for Public Safety?

To encourage compliance, the NYC DOB created [an interactive map](#) with real-time data on every subject building in New York, color-coding each according to its FISP filing status. Making this data available to

the public is intended to prod owners into resolving hazardous facade conditions promptly so their properties move from red to green.

In Cycle 9, the NYC DOB introduced another means of prompting compliance, issuing Exterior Wall Condition Certificates proclaiming FISP filing status, which must be displayed in the building lobby or vestibule. Faced with a prominent "Unsafe" sign, the City reasoned, owners would be motivated to correct conditions quickly.

## Hefty Penalties

[Penalties](#) jumped substantially in Cycle 9, and these steep fines remain in place for Cycle 10. Compared with a penalty of \$1,000 per month for late filing, compounded by an extra \$5,000 per year for failure to file, the \$425 fee for filing a FISP report is a relatively modest expense, even considering the cost of retaining an experienced QEWI. Failing to correct SWARMP conditions incurs a civil penalty of \$2,000, whereas Unsafe conditions left unresolved yield a penalty of \$1,000 *per month*, plus additional monthly charges per linear foot of sidewalk shed, which grow exponentially the longer the sheds are in place.

## Key Takeaways for Cycle 10

Building owners who filed during Cycle 9 will find few surprises with Cycle 10. For owners who were remiss in filing during Cycle 9, the option to file early this cycle may provide a welcome opportunity to limit penalties and resume compliance. Performing the newly mandated Annual Parapet Observation as part of the FISP Critical Examination streamlines the inspection process and avoids the hassle and expense of repeating the same work twice.

For Cycle 10, owners are advised to:

- Determine the [Cycle 10 filing window](#) based on the [block number](#).
- Retain [a certified QEWI](#) early in the sub-cycle or before it starts.
- Apply to [file early](#) if no report was filed in Cycle 9 and the building falls within sub-cycles 10B or 10C.
- Address [outstanding Unsafe and SWARMP conditions](#) from Cycle 9 and file amended reports.
- Schedule the [Critical Examination](#) far in advance, allowing time to arrange for lifts, scaffolding, sidewalk bridging, contractors, and associated permits as part of the inspection process.

With a proactive approach, building owners and managers need not stress about meeting Cycle 10 FISP requirements. Taking it one step at a time will allow budgeting for needed repairs and avert surprise expenses, while protecting public safety and the long-term integrity of the building enclosure. ■

## Resources

[NYC DOB Facade Compliance Page](#)

[NYC DOB Annual Parapet Observation Page](#)

[Cycle 10 Service Notice: Early Filing for Non-Complying Owners](#)

[1 RCNY §103-04, Periodic Inspection of Exterior Walls and Appurtenances of Buildings](#)

[Hoffmann FISP Resource Page](#)

## Hoffmann Architects + Engineers specializes in the rehabilitation of building exteriors.

Our design professionals have been providing facade compliance services for NYC buildings since the first exterior wall rule in 1980. With QEWI's who understand the nuances of the law and the complexities of building enclosures, you're in good hands.

Reach us at 212-789-9915 or [hoffarch.com/contact](mailto:info@hoffarch.com).

This material is for informational purposes. Before taking action, consult a design professional.

© 2025 Hoffmann Architects + Engineers