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New York City Enacts Private Workforce Pay Equity Law

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New York City employers will soon face considerable new pay equity obligations. New York City enacted an [ordinance](#) on December 4, 2025, which will require large private employers to report pay equity information to an agency identified by the Mayor.

Who Is Covered?

The law applies to any private employer with 200 or more employees working in New York City. This includes full-time, part-time, and temporary workers. The employee count is determined by the highest number of employees concurrently employed at any point during the reporting year.

Key Requirements

1. Pay Equity Study and Reporting System

Within one year of the law's effective date, the Mayor will designate an agency to conduct a pay equity study of the private workforce located within the City. Within one year of being designated by the Mayor, this agency will develop a standardized fillable form for covered employers to submit annual pay reports.

2. Annual Pay Report Submission

Employers' first report must be submitted within one year of when the designated agency publishes its standardized form and must be submitted annually thereafter. The report must include pay information by job category, race/ethnicity, and gender. Employers may also provide explanatory remarks about their data.

Importantly, individual employee's personal information is not required in these reports, and employers may submit their reports anonymously.

3. Statement of Accuracy

Each pay report must be accompanied by a signed statement from an authorized agent of the employer, confirming the accuracy of the information submitted. If an employer chooses to submit its report anonymously, its signed statement of accuracy must identify the employer.

4. Publication of Non-Compliant Employers

The designated agency will publish an annual list of employers who fail to submit the required statement of accuracy. Employers will be notified and given at least 30 days to comply before being listed publicly.

5. Penalties for Non-Compliance

- First Offense: Written warning if cured within 30 days; otherwise, a \$1,000 civil penalty.
- Subsequent Offenses: \$5,000 civil penalty per violation.

Pay Equity Analysis

New York City also enacted a companion **ordinance** which directs the designated agency to conduct a pay equity study that evaluates disparities based on gender and race/ethnicity. The agency must publish aggregate information from employers' reports, but in a way that does not identify any particular employer or its employees. The agency will also make recommendations for addressing any disparities identified in the studies.

Compliance Timeline

Each step of the process has a one-year delay built in. The Mayor has up to one year to designate an agency to run the program, and the agency then has up to one year to create a standardized reporting form. Once that form is created, employers have one year to submit their first report. This means that employers may have until December 2028 to submit their first report, though the ultimate deadline depends on how quickly the Mayor designates an agency and how fast that agency creates a reporting form.

Takeaways for Employers

Large employers in New York City should review their payroll and HR systems to ensure required data is captured and assess current pay practices across job categories.