LABOR AND EMPLOYMENT LAW
INFORMATION MEMO
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New York City Council Passes New Pay Equity Reporting Bill

The sun rises, the alarm blares and Sonny & Cher's "I Got You Babe" plays on the radio. It's Groundhog Day— or, for New York City employers, another new bill from the City Council introducing additional compliance requirements.

On Oct. 9, 2025, the New York City Council passed, with overwhelming support, two bills that together would establish a framework requiring private employers in the city to report pay and demographic data for purposes of determining whether there are any disparities in compensation based on gender, race or ethnicity. While the bills currently await action by the mayor, it is widely expected that they will become law—either through approval by the incoming administration or by a veto override.

The first bill, Int. No. 982-A, requires private employers with 200 or more employees to submit a pay report annually. In determining the number of employees, all employees, whether full-time, part-time, or temporary, would be counted. While many employers have a fluctuating number of employees, the count is "determined by counting the highest total number of employees concurrently employed at any point during the reporting year."

The bill will require the mayor to designate a city agency to develop a standardized form for employers to submit reports. Once the standardized form is published, employers will be required to submit the pay report to the agency within the next year and every year thereafter. The city will allow employers to submit the information anonymously. Upon submitting the required data to the designated agency each year, employers must also sign a statement certifying the accuracy of the information contained in their report, which must identify the employer. Employers that fail to comply with the Bill's requirements would be subject to penalties. While a first time offense can be remedied within 30 days of a summons indicating a violation, if the employer does not remedy the violation, it would face an initial civil penalty of $1,000. For each subsequent violation, the employer would face a civil penalty of $5,000. There does not appear to be a cap on how many times the employer would be subject to this penalty.

The second bill, Int. No. 984-A, would work in tandem with Int. No. 982-A, requiring the designated agency to create a pay equity study no later than one year after employers submit their reports, and annually thereafter. This study must evaluate the data from the pay reports to assess disparities in compensation based on gender, race or ethnicity, identify prevalent industries with disparities and track trends in occupational segregation. Moreover, the report would be done in a manner that does "not reveal any particular covered employer's or employee's identifying information."

Given the annual reporting and the level of detail required, the bills are expected to impose additional administrative burdens on employers. Employers who have high turnover rates or seasonal employees may face obstacles in complying with this bill to the extent it may be difficult to gather, organize and report data accurately.

While not yet law, these bills are expected to take effect soon and we will continue to track their progress. Employers should remain aware of existing federal reporting obligations and consider taking steps to prepare for the collection and reporting of data under these potentially forthcoming requirements.

If you have any questions or would like any additional information regarding any policy updates, or other legal developments, please contact **Sam Dobre**, **Mallory Campbell**, **Samuel Wiles** or any attorney in Bond's labor and employment practice.

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