

# Now & Next

## Labor & Employment Alert

December 11, 2025

### **New York City to require employers to report employee pay and demographic data**

By Christopher J. Moro and Peter Wilms

Employers should review compliance obligations after NYC Council overrides mayor's veto of employee pay and demographic disclosure bill.



#### **What's the impact?**

- New York City employers with 200 or more employees in New York City will soon be required to annually report employee pay, race, ethnicity, and sex data.
- The law has a multi-step implementation period, which could extend up to three years before employers are required to report employee information.
- Covered employers who fail to submit required information will have their names published online on the appointed agency's website and be subject to monetary penalties.

On December 4, 2025, the New York City Council overrode Mayor Adams's veto of Introduction 982-A, a pay transparency law that requires private employers with 200 or more employees to annually report pay data and demographic information. This law was passed in the wake of

similar pay data reporting laws in California and Illinois and seeks to reduce gender and race pay inequities.

## **Covered employers**

The new law applies to all private employers with 200 or more employees employed in New York City. Employer size is determined by counting the highest total number of full-time, part-time, and temporary employees concurrently employed by that employer during the reporting year, and only includes employees employed within New York City.

## **Reporting requirements**

Covered employers will be required to submit an annual pay report to the City through a standardized fillable form that lists employee pay, race, ethnicity, and sex. Employers will be given the option to submit the annual pay report anonymously and will not be required to disclose individual employees' personal information. In addition to submitting the pay report, employers will be required to submit a signed statement confirming the report's submission and the accuracy of information contained therein.

## **Expected implementation**

This law will be implemented in several steps. Within the next year, the mayor must designate an agency to collect reported information. This agency then has one year to develop a standardized form for employers. Once developed, employers will have one year to submit the required information. Employers should anticipate the reporting system opening no later than two years from now and that reports will be due in approximately three years.

## **Penalties for noncompliance**

Employers who fail to report will be given notice of noncompliance and provided with 30 days to comply. Continued noncompliance will result in a \$1,000 fine for a first offense and a \$5,000 fine for subsequent offenses. Lastly, the appointed agency will publish an annual list online with the names of employers who fail to comply with the law.

Further guidance by the City or appointed agency is expected before employers are required to submit employee pay and demographic information. Our [Labor & Employment](#) lawyers regularly partner with employers to develop focused compliance solutions that minimize risk and disruption while prioritizing operational efficiency. For assistance in complying with these new laws, please contact your Nixon Peabody attorney or the authors of this alert:

**Christopher J. Moro**

516.832.7632

[cmoro@nixonpeabody.com](mailto:cmoro@nixonpeabody.com)

**Peter Wilms**

516.832.7570

[pwilms@nixonpeabody.com](mailto:pwilms@nixonpeabody.com)