

NYC CORE Evaluation

of the Mayor's Final Racial Equity Plan

September 2026



Dedication

The New York City Commission on Racial Equity (NYC CORE) commits every aspect of this work to remembering and honoring lives killed and lost due to racial and social injustice.

Holding government accountable to advancing racial equity and social justice is not only owed to the lives stolen from us but also to those who did not let their memory, their struggle, or their story be forgotten.

The Lenape (Lenapehoking) and other Native American and Indigenous peoples who settled here before the City's founding and were displaced by colonial violence. The African and Indigenous descendants whose land, labor, bodies, and dignity were exploited to build New York City over centuries of wrongful enslavement, now formally declared as the gravest crime against humanity.

We stand with those whose voices and stories have been erased from record, silenced, or pushed to the margins. Thank you to those who came before us for leading, demanding and inspiring the clear call for change outlined in this response.

Acknowledgments

Thank you to NYC CORE Organization Partners.

Over the course of the last two and a half years, NYC CORE has worked with thousands of New Yorkers to hear what Community Equity Priorities (CEPs) and actions that they want the NYC government to focus on to improve their wellbeing. We have solicited feedback from hundreds of organizations, including but not limited to NYCHA Tenant Councils, nonprofits, community and faith-based organizations, local community governance groups, volunteer-led and mutual aid entities, collectives, cooperatives, small businesses, and MWBEs.

Groups chosen for this work provide services in a racially and culturally competent, linguistically accessible manner, including engaging community members regardless of socioeconomic status, criminal justice status, immigration status, race, ethnicity, nationality, gender identity, sexual orientation, mental health status, physical ability or disability, religion, or previous or current child welfare or other systems involvement. We remain grateful for the time, expertise, and commitment from everyone who contributed to this work, voted for the ballot measures, and took to the streets to demand justice. This moment in history is due to your service to your community and the future of our city.

Thank you to NYC CORE Partners!

Thank you to Tyrik Washington of 4TE Capitol Solutions and his team for their time, dedication, commitment, and invaluable expertise as communications, community engagement, and political strategist working to advance racially and socially just New York City.

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Letter from The Chair & Executive Director



Dear New York City Leadership,

It is with great honor that the New York City Commission on Racial Equity (NYC CORE) puts forth an evaluation of the first-ever Mayor's Final Racial Equity Plan. Our review focuses on whether the City's efforts comply with the legal requirements of the Racial Equity Planning Process and integrate community voice, as presented in the NYC CORE Response to the Preliminary Racial Equity Plan, released in May 2026.

The Racial Equity Planning Process, which is law, plays a significant role in our city's willingness to meet the political moment. For decades, New Yorkers have demanded justice through institutional transformation to improve the well-being

of New Yorkers suffering from racism and social injustice. People of all ages, races, genders, sexualities, documentation status, and ability have taken to the streets, City Hall, City Council, and borough-based offices to demand an end to racist practices in government. A Racial Equity Plan should show New Yorkers that we are ready to meet this moment and say to communities harmed by racism and social injustice – we've got your back!

As City leadership, we must fight against the rising anti-Blackness, Xenophobia, anti-LGBTQIA+, and increasing injustices in our local, state, and federal government practices.

The Racial Equity Planning Process requires the Mayor's Office of Equity and Racial Justice (MOERJ) to develop a citywide plan and to direct individual city agencies to develop concrete goals, strategies, indicators, and outcomes. To effectuate change, MOERJ must present clear data disaggregation guidelines standardized across all city agencies. Agency and citywide racial equity planning and implementation must guide citywide budget priorities and center community needs.

As the only city in the nation with a voter-approved accountability commission focused on race, NYC CORE serves as a check and balance to ensure that all government agencies advance racial equity and increase community voice in government decision-making. Our

mission, our mandates, and our execution center community voice. We know that New York City will never achieve its mission of multiracial democracy if we do not take the Racial Equity Planning Process seriously and comply with racial equity law.

Racial equity law requires a cohesive citywide strategy for data disaggregation, system-level indicators, clear pathways to increase community voices in government decision-making, and city and agency level racial equity financial investments. Our evaluation of the Final Racial Equity Plan assesses compliance with the law by leveraging feedback we have received from past public engagement and a review conducted by Commissioners and staff.

We hope this review is helpful to you and members of the public in assessing the extent to which Racial Equity Law is being implemented in NYC and in determining the City's next steps. As a commission, we look forward to continuing partnership, growth, and increasing accountability across government.

In Service,

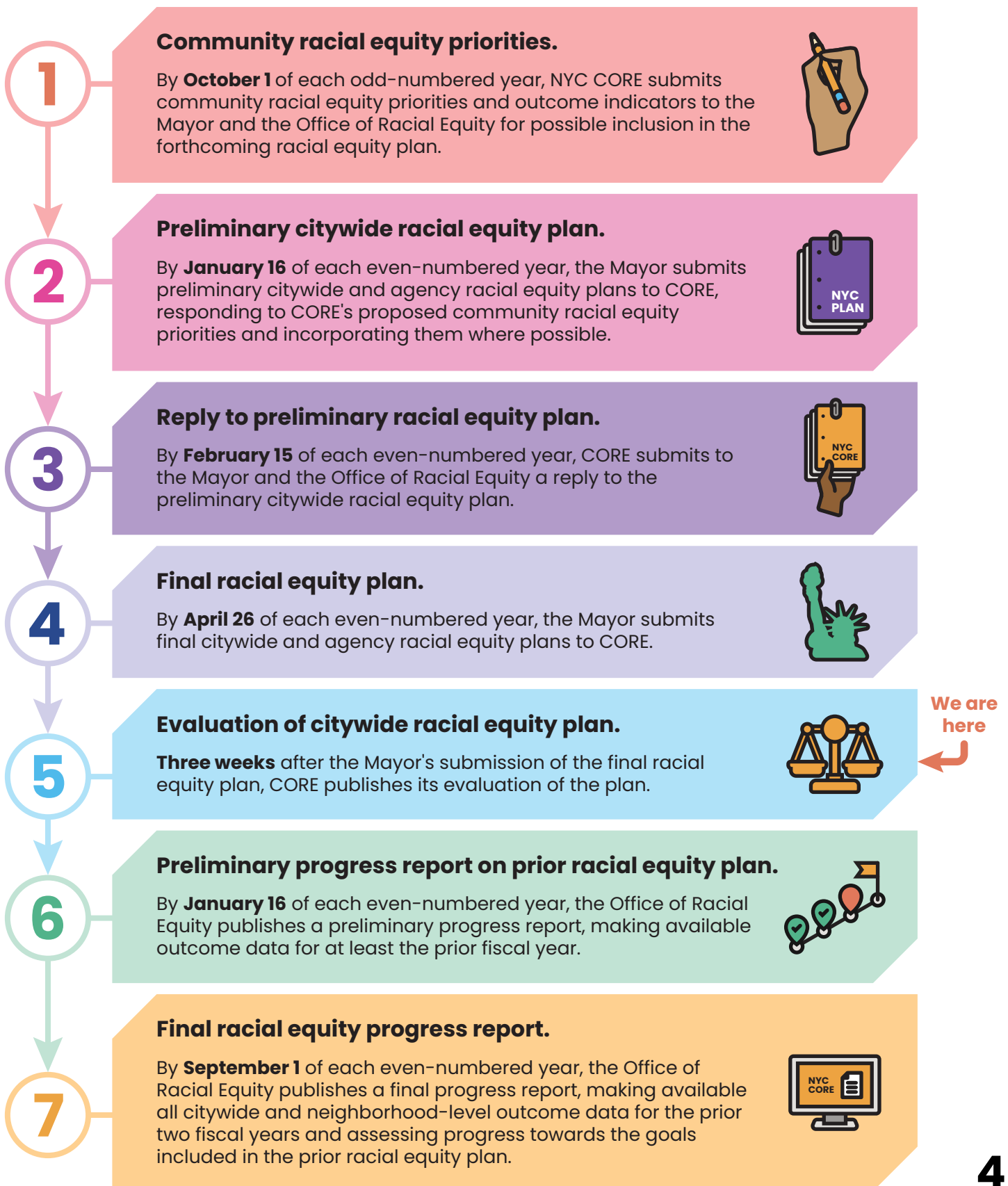


Linda Tigani
Chair and Executive Director





Racial Equity Planning Process



“We, the people of New York city, declare that our city is a multiracial democracy, and that our diversity is our strength. We honor and respect the cultures, languages, and histories of all who call and have called this land home, and we celebrate their revolutionary imagination, courage, and resiliency.”

– The New York City Charter, Preamble

Executive Summary

Racial equity requires a whole-of-government approach to structural change that reflects government’s political and financial commitment to ending racism. To be truly effective, the actions of the racial equity plan must reflect investments in the well-being of Black and Brown New Yorkers through city-wide and agency budgets. Following the Mayor’s Preliminary Racial Equity Plan’s release in April 2026, New York City (NYC) released the first-ever Final Racial Equity Plan on September 1, 2026. The Final Racial Equity Plan, while off schedule with the city’s racial equity planning timeline and city budgeting process, presents citywide goals and agency goals, strategies, and outcome-connected indicators.

Over the past 21 days, the NYC Commission on Racial Equity (NYC CORE) undertook an evaluation of the Final Racial Equity Plan to assess its compliance with the Racial Equity law outlined in the NYC Charter, its integration of community voice represented in the NYC CORE

Response to the Mayor’s Preliminary Racial Equity Plan, and responsiveness to the City’s Community Equity Priorities (CEPs).

The Mayor’s Final Racial Equity Plan fails to meet the basic legal requirements and provide sufficient evidence of what shifts, if any, are being made in agency operations to ensure that race is no longer a determinant of well-being in our city. Although some agencies have improved parts of their plans, more work is needed to comply with the law and be an effective tool for advancing racial equity in government. We offer the following areas for the Mayor’s Office of Equity and Racial Justice to improve and ensure effective implementation:

- Develop and incorporate overarching citywide racial equity strategies for each citywide goal.

- Develop clear, standardized citywide performance and outcome indicators to measure progress toward racial equity for citywide and agency goals.
- Identify and issue priority neighborhoods for targeted investment to improve the well-being of Black and Brown New Yorkers.
- Issue standard data disaggregation guidelines and citywide measures disaggregated by race, ethnicity and additional categories to track change in data collection, analysis, and reporting. Ensure data is publicly available, wherever possible, for independent tracking.

- Ensure that the Final Racial Equity Plan guides forthcoming city and agency budgets.

NYC government leaders should ensure the implementation of the Final Racial Equity Plan incorporates the recommendations and creates new and effective pathways for community voice in government decision-making throughout the policymaking process.

In the following pages, NYC CORE provides an evaluation of the Final Racial Equity Plan in accordance with the requirements outlined in the NYC Charter.



“There shall be established a commission on racial equity, the purpose of which is to enable community members with equity expertise or lived experience relevant to the goal of equity to propose priorities for racial equity in city decision-making and policy and assess performance towards those priorities.”

- The New York City Charter, Equity, Section 3404(a)

Introduction

It is with great honor that the NYC Commission on Racial Equity (NYC CORE) presents an evaluation of the first-ever Mayor’s Final Racial Equity Plan. In New York City (NYC), racial equity is the law; therefore, the Final Racial Equity Plan must meet the legal requirements and provide New Yorkers with a roadmap to a multiracial democracy.

Every city leader plays a key role in enacting racial equity in our city. Our goal is to ensure that government officials utilize our review to strengthen their work holding one another accountable to end racism and social injustice in our city. Most importantly, we aim to ensure that NYC can become a beacon of hope and social justice change in a moment of great racism, divisiveness, discrimination, and oppression.

For decades, New Yorkers of all ages have taken to the streets to fight for justice in our city. In response to decades of protests demanding an end to police

violence against Black and Brown New Yorkers, over a million New Yorkers voted racial equity into law. As law, the Racial Equity Planning Process outlines a structural foundation, clear vision, and shared language to advance racial equity in government. The NYC CORE, an independent commission integral to Racial Equity law, is here to hold government accountable to this vision, mission, and structural transformation. We serve as a check and balance on the Racial Equity Planning Process, and as the sole institution in NYC holding government accountable for redress of race-based harm by government.

The NYC Charter racial equity amendments, as implemented through the Mayor’s Office of Equity and Racial Justice (MOERJ), include completing the Racial Equity Planning Process to fidelity, managing the Taskforce on Racial Inclusion and Equity (TRIE) and renewing TRIE zip codes, producing and holding agencies to the implementation of

standard data disaggregation guidelines, developing and implementing a citywide access design program, and supporting all agencies in eliminating marginalization in employment practices within the City's workforce such as hiring, promotion, salary assignment, and limiting the use of criminal history and background checks wherever possible. The extensive duties and responsibilities of this office make clear that New Yorkers voted for a whole-of-government approach to racial equity.

The Final Racial Equity Plan is an essential component of implementing a whole-of-government approach to ending racism and social injustice in government operations, programs, policies, and budgets. The NYC CORE evaluated the full plan, and individual agency plans to assess alignment with the voters' will and the law. Racial Equity Plans are legally required to detail goals, strategies, and outcome indicators tracked using disaggregated data categories that reflect the diversity of NYC's communities.

The Final Racial Equity Plan serves as a central coordinating document that clearly shows what, how, and by when the government makes real efforts to improve the well-being of racial groups and neighborhoods. To further align the efforts, the Charter provides shared vocabulary defining racial equity and equity as a process and outcome, data disaggregated as the breaking down of data points into small categories, and priority neighborhoods as communities with disproportionate or the potential of future disproportionality in equity, health, or socio-economic burdens that can

increase racial equity disparities.

In NYC, the racial wealth gap, racial life expectancy gap, along with additional indicators, tell us that racial equity disparities are continuing to grow. Black and Brown people are losing their lives. Real transformational change that is fully funded in government is not only legally required, but also essential to keeping Black and Brown people alive and thriving. As the City moves to the next step, the NYC CORE evaluation of the final racial equity plan highlights gaps and areas for improvement during implementation.

In the following sections, we present an evaluation of the Mayor's Final Racial Equity Plan, along with corresponding sections of exact language from the Charter that outline what the law requires of the Mayor and MOERJ to complete. Our evaluation includes a brief discussion of the importance of fidelity to the Racial Equity Planning Process timeline, followed by next steps.



“The city of New York... will undertake a process of citywide and agency planning and reporting with a goal of eliminating racial inequity... guided by the principle of equity with a focus on racial equity,” as defined by “the closing of gaps in policy, practice, and allocation of city resources through the prioritization of access, opportunities, and resources to those people and communities with the greatest need, whether due to historical or current marginalization or oppression, underinvestment, disinvestment, or under-resourcing of those people and communities, or due to the way in which their intersecting characteristics of identity serve to magnify inequities.”

– **The New York City Charter, Equity, Section 3403(a), Section 3400(a)**

City-wide Plan Requirements

The New York City Commission on Racial Equity (NYC CORE), along with the many New Yorkers whose voices form the foundation of this work, welcomes the release of the Mayor’s 2026 Final Racial Equity Plan and the Administration’s effort to build a shared framework for advancing racial equity across City government. However, the Commission is concerned that the plan does not fully meet the City Charter’s mandate to “undertake a process of citywide and agency planning and reporting with a goal of eliminating racial inequity” through individuals and communities who, “based on at least in part due to race” have struggled with historic and current oppression, under-resourcing, and disinvestment by government.

The Charter sets clear requirements for the Citywide Racial Equity Plan, which goes beyond identifying broad, aspirational goals. At a minimum, the Final Racial Equity Plan must include goals and strategies to improve racial equity

in policymaking, operations, and the workforce; citywide and neighborhood-level outcome indicators permitting the assessment of year-over-year changes in wellbeing and disparity levels, to be reported in accordance with established data disaggregation standards; maps of needs-based priority neighborhoods; and a statement that explains the selection of these goals, strategies, and indicators and responds to NYC CORE’s submission of Community Equity Priorities (CEPs).

The Final Racial Equity Plan only partially meets these requirements, which is especially concerning given the time invested in its development. Over a million New Yorkers voted in 2022 to establish a racial equity framework as law in the Charter, and many would have expected great progress by now. In the past two years, thousands more New Yorkers engaged with NYC CORE to identify CEPs and provided feedback on the Mayor’s Preliminary Racial Equity Plan which was released in April 2026. The Final Racial

Equity Plan comes after this extensive process, at a time when New Yorkers are increasingly struggling to afford the city they sustain. Black New Yorkers continue to face a significant racial wealth gap and disparities in housing, employment, food access, health, transportation, and other basic needs that shape the outcomes of individuals' and families' lives.

The Racial Equity Plan cannot serve as a mere administrative document or symbolic gesture toward racial equity. It must guide city- and agency-wide budgets, policy, and practice as mandated by the Charter and informed by the needs of communities harmed by racism and social injustice. The Final Racial Equity Plan's goals, strategies,

indicators, and measures of progress must reflect the experiences of New Yorkers facing these racial and social disparities.

The City must do more than state its intentions; it must clearly outline how it will act, invest, coordinate, measure progress, and remain accountable for achieving racially equitable outcomes in the lives of Black and Brown New Yorkers. That significant work begins with meeting and adhering to the standard that the Charter has set, one specific enough to drive structural change across City government and NYC. The following sections expound on the Final Racial Equity Plan's partial fulfillment of the Charter requirements.





“Overarching citywide goals and strategies to improve racial equity throughout the city government’s policymaking, operations, and workforce, including the equitable distribution of benefits, of supportive services, and of environmental burdens by neighborhood;”

The New York City Charter, Equity, Section 3403(b)(1)

Overarching Goals and Strategies

The Final Racial Equity Plan does not fulfill the Charter requirement for the Citywide Racial Equity Plan to establish overarching citywide goals and strategies that will improve city investments, service delivery and policy making. The Final Racial Equity Plan includes eight citywide goals:

- 1. Connectivity**
- 2. Unemployment**
- 3. Housing**
- 4. Early Childhood Education**
- 5. K–12 Education**
- 6. Transportation**
- 7. Justice System Contact**
- 8. Health**

Citywide goals highlight key areas where racial disparities call for immediate government action, and some address CEPs identified by New Yorkers. However, the eight goals do not include the necessary overarching strategies to achieve the corresponding citywide goals.

The City refers to the eight citywide goals as a “shared layer of cross-cutting priorities,” “an initial set of priorities,” and “directional” goals which complement rather than replace the agency-level plans. The Final Racial Equity Plan also recognizes that no single agency or strategy can independently advance the goals and that coordination across government is necessary. This points out a key gap: while the Final Racial Equity Plan sets out the changes the City needs to make, it does not outline the broader citywide strategies the City as a whole needs to pursue to achieve these goals.

Rather than adopting citywide strategies, the Final Racial Equity Plan selected specific strategies from individual agency-level Racial Equity Plans. Although the strategies of individual agencies can help meet citywide goals, they cannot replace comprehensive, overarching citywide strategies. An agency-level strategy can only explain and direct what that particular agency will do, while a citywide strategy explains and directs how the City as a whole will act to achieve a citywide goal.

The distinction between citywide and agency-level strategies is important because the racial inequities presented in the Final Racial Equity Plan are interconnected and are either caused by or reinforced across multiple systems. Racial inequities across connectivity, unemployment, housing, education, transportation, legal and law enforcement system contact, and health cannot be fully addressed by individual agencies working in silos. Instead, a set of citywide strategies is necessary to clearly delineate interagency arrangement and explain how the appropriate agencies can collaborate and coordinate their policies, operations, programs, services, investments, budgets, workforce practices, and other resources to respond to and be held accountable for the structural conditions that cause racial disparities.

Although the various agency-level strategies outlined in the Final Racial Equity Plan can be part of the broader set of citywide strategies, the Final Racial Equity Plan does not provide the citywide framework necessary to link and

coordinate these efforts. Moreover, the missing citywide strategies are needed to achieve the outlined citywide goals by the targeted deadline. The Final Racial Equity Plan sets out an eight-year timeframe with targets extending to 2034.

NYC CORE understands that the structural factors of racial disparities need continuous investment, structural change, and time to be addressed. However, the Final Racial Equity Plan does not specify how the City will monitor progress and make adjustments along the way to achieve the citywide goal. The racial disparities described in the Final Racial Equity Plan directly and continuously impact the daily lives of New Yorkers; therefore, the City must take appropriate action and be accountable to the community throughout the entire planning period, not just at the end of the eight years.



“Performance and outcome indicators for citywide racial equity goals reported in accordance with the collection and reporting standards and guidelines, including for disaggregation of data, established by the office of racial equity;”

- The New York City Charter, Equity, Section 3403(b)(2)

Performance and Outcome Indicators

Citywide goals identify the outcomes the City wants to achieve, while citywide strategies describe the steps government will take to get there. Performance and outcome indicators are tools used to measure progress and whether racial disparities are improving. The Final Racial Equity Plan does not meet the Charter requirement to establish citywide performance and outcome indicators.

The Charter requires separate indicators for agency-level and citywide racial equity plans. Every Agency Racial Equity Plan must include at least one outcome indicator for each goal, and the Citywide Racial Equity Plan must set its own performance and outcome indicators for citywide goals. In other words, individual agencies' indicators alone are insufficient and cannot substitute for citywide indicators. The Citywide Racial Equity Plan needs its own measures to track progress at the citywide level.

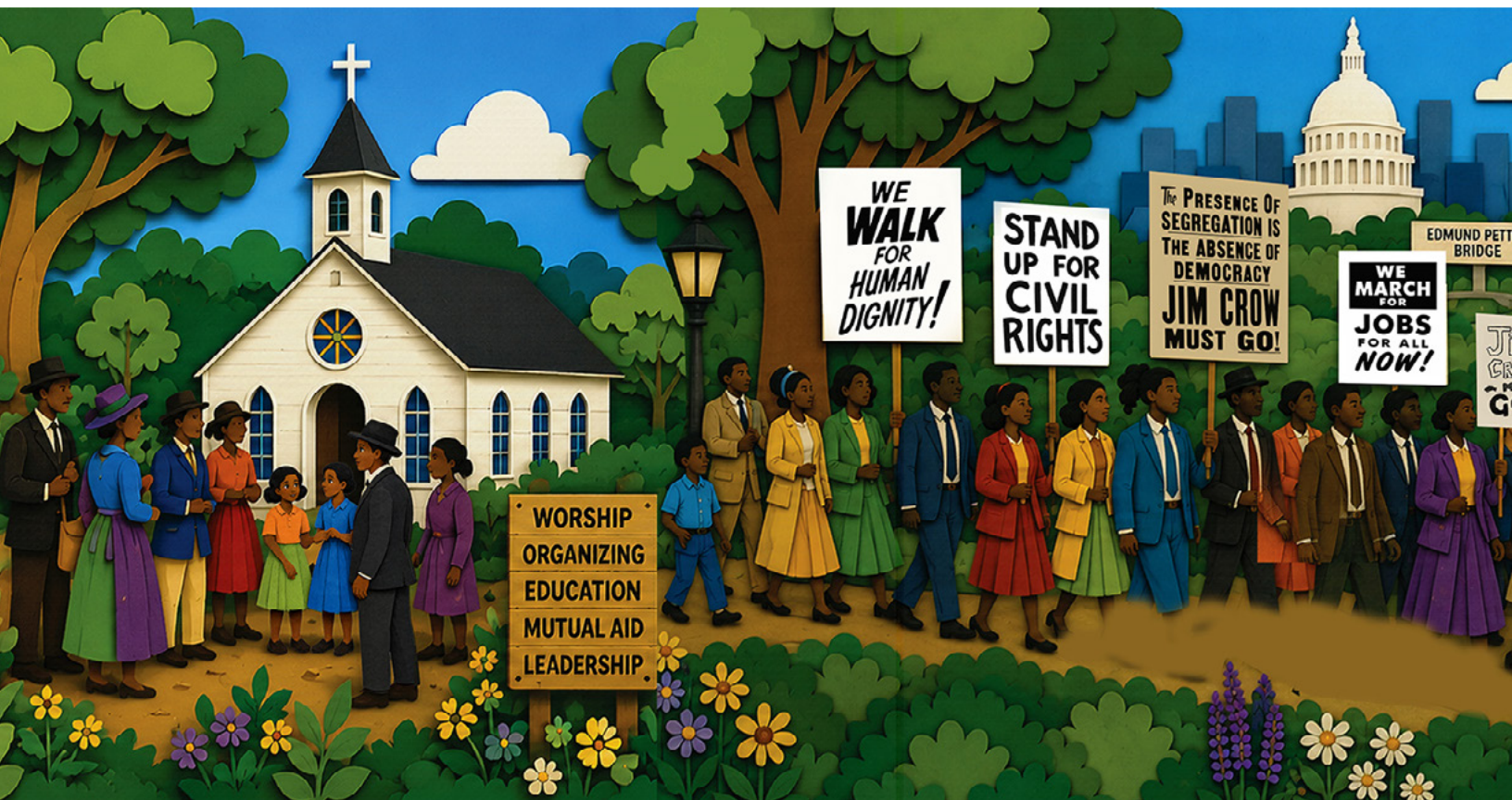
According to the Charter, an outcome indicator is “a measure of quantitative data that enables an assessment of the improvement, worsening, or stagnancy of an aspect of wellbeing or quality of life for individuals, communities, or populations.” However, the Final Racial Equity Plan does not establish performance and outcome indicators for its eight citywide goals. The Final Racial Equity Plan states that the City will track progress using data that is available by race, ethnicity, neighborhood, and/or other categories, but it does not define the exact indicators, baselines, or measures that need to be used to determine whether racial disparities are improving, worsening, or remaining stagnant.

This issue is concerning because the City still does not have citywide data disaggregation standards for racial equity planning. The Charter requires a shared set of uniform rules for what data to

collect, how to break it down, how to share it, and how to report progress. Without data disaggregation standards, the City ultimately cannot determine how racial equity outcomes change for different groups over time.

Citywide performance and outcome indicators are also essential for setting meaningful benchmarks and for conducting recurring assessments

through progress reports required by the Charter. With citywide goals set for the next eight years, from 2026 through 2034, the City needs starting points and benchmarks to determine whether it is on track and whether changes are needed along the way. Progress reporting could help, but only if clear measures accurately show whether things are moving in the right direction of advancing racial equity.





“Maps of needs-based priority neighborhoods as identified by the office of racial equity;”

– The New York City Charter, Equity, Section 3403(4)

Updated Maps of Needs-based Priority Neighborhoods

The Final Racial Equity Plan does not fulfill the Charter requirement to produce needs-based priority neighborhoods because it incorporates outdated maps and fails to include the indicators necessary to create such maps.

The Charter defines priority neighborhoods as “neighborhoods that have disproportionate equity, health, or socioeconomic burdens, or that have the potential to be disproportionately impacted by future events that could exacerbate racial disparities.” This definition directs a needs-based assessment to identify neighborhoods that warrant particular attention in the City’s racial equity planning and implementation efforts.

The Final Racial Equity Plan includes maps showing neighborhood-level disparities in its appendix, including the Taskforce on Racial Inclusion and Equity (TRIE) map, maps overlaying the TRIE neighborhoods with NYC poverty rates

(2021), premature mortality rates (2023), unemployment rates (2023), and the NYC Neighborhood Financial Health Index (2021). These sources provide useful information about neighborhood-level conditions and are important starting points for identifying neighborhood-level disparities are concentrated. These maps are existing mapping products developed by other City entities that draw upon previously established data and mapping frameworks.

The Charter calls for MOERJ to use existing geographic data and maps, as well as other relevant data, to make a policy determination on which neighborhoods to prioritize, and to use the newly determined priority neighborhoods to guide citywide and agency racial equity planning. However, the maps included in the Final Racial Equity Plan do not demonstrate that this determination has been made. The Final Racial Equity Plan neither identifies a set of the City’s needs-based priority neighborhoods as Charter-mandated

nor includes a map of such designated priority neighborhoods.

While the TRIE Map remains a relevant source and tool for the MOERJ to identify needs-based priority neighborhoods and coordinate attention to those experiencing disproportionate racial inequities, it is an outdated resource that can only serve as a starting point for racial equity planning and implementation. The TRIE map was originally developed in 2019 and has not been updated since despite the Charter's requirement for MOERJ to identify priority neighborhoods every two years, adjusting for change in racial equity across key areas, including but not limited to health and socioeconomic conditions.

The TRIE Map cannot be substitute for the Charter mandated needs-based priority neighborhood maps. Continued use of outdated mapping frameworks undermines the integrity of this work and responsiveness to community members' needs because neighborhood conditions, demographic patterns, health outcomes, economic conditions, and exposure to environmental and other burdens continuously change over time.

The absence of a citywide identification of priority neighborhoods used across agencies creates barriers to agency-level planning and implementation. Agencies need a common, standardized recognition of priority neighborhoods to avoid neglecting these communities in their planning and to avoid leaving agencies to identify them on their own. This can result in different definitions, criteria, and geographic areas (e.g., neighborhood

tabulation areas, Community Districts, census tracts, boroughs) being used instead of a coordinated citywide approach to directing racial equity planning and implementation. In fact, some agencies have included goals in their racial equity plans to identify priority neighborhoods as strategies to advance racial equity. Agencies should not have to bear this burden in isolation, as it is the responsibility of MOERJ.

Citywide identification of priority neighborhoods by MOERJ must include a public document and a current, needs-based methodology for identifying priority neighborhoods consistent with the Charter's definition. That methodology should then be used to identify and map a current set of needs-based priority neighborhoods, and to incorporate those maps into future racial equity planning processes, including the technical assistance and guidance provided to agencies to incorporate those neighborhoods into their planning and implementation. MOERJ should also establish a regular process for reviewing and updating the priority neighborhoods in response to changing conditions. In addition, MOERJ should begin and carry out the required work to maintain the TRIE within its office while continuing to serve as the citywide leadership and advisory body for racial equity and social justice as well as ensuring that all agencies cooperate and coordinate with the Taskforce's duties.



**STAND
UP FOR
CIVIL
RIGHTS**

The **PRESENCE OF
SEGREGATION IS
THE ABSENCE OF
DEMOCRACY
JIM CROW
MUST GO!**

**WE
MARCH
FOR
JOBS
FOR ALL
NOW!**

**EDMUND PETTUS
BRIDGE**

**JIM
CROW
MUST
GO**

Racial Equity Planning Schedule

In the wake of a two-and-a-half-year delay in publication, it is imperative that the City achieve full compliance with the mandated planning schedule. Further departure from the schedule outlined in the NYC Charter undermines the integrity of the process in a moment of increasing erosion of the rule of law and the very purpose of racial equity planning by uncoupling it from the budget cycle.

The timeline specified in the Charter is neither arbitrary nor subject to Mayoral discretion. As noted explicitly in the final report of the Charter revision commission responsible for the racial equity amendments, “[b]ecause of the importance of budgeting and resource prioritization to the racial justice process... the executive branch... will develop Racial Equity Plans simultaneously with... the Citywide Budget,” with community equity priorities shaping agency new needs requests in the fall and Preliminary Racial Equity Plans released along with the Preliminary Budget in January. After the

final Plans are released along with the Executive Budget in April, they inform the budget negotiation process in May.

Apart from its intentionality, the racial equity planning schedule is a matter of law, as confirmed in the State Supreme Court’s recent holding that “abiding by a Charter mandated deadline is not discretionary” (*The New York City Commission on Racial Equity v. Eric Adams, et al.*, Index No. 161269/2025 (Sup. Ct. N.Y. Cnty.)). As a result, simply “aim[ing] to remain on the racial equity planning schedule” will not suffice to demonstrate compliance.



“The office of racial equity shall have the power and duty to... coordinate citywide and agency racial equity planning... including establishing standards for disaggregation of data, across categories that shall include, without limitation, race and gender, and may also include other standard categories of disaggregation, including ethnicity, income, neighborhood, and socio-economic status, or other characteristics, at levels of granularity matching or exceeding generally accepted levels of disaggregation, and sufficient to permit identification of disparity among or within groups, and accounting for an agency’s function, to be utilized in citywide and agency racial equity planning;”

– The New York City Charter, Equity, Section 3401(d)(2)(b)

Data Disaggregation Standards

Data disaggregation is foundational to racial equity planning at both the citywide and agency levels, ensuring that all of the Racial Equity Plan’s requirements are implemented and work effectively. The NYC Charter requires data disaggregation standards to include, but not be limited to, race, class, gender, and other categories to help identify disparities within and across different groups.

The Final Racial Equity Plan contains a data disaggregation framework referred to as a “vision,” along with “working principles,” and “working standards” that the City “aspires to work towards.” The working standards outline why a citywide minimum for data disaggregation is needed for “the City to identify and understand disparities within and across population.” As a starting point, MOERJ has identified detailed categories such as income and socioeconomic measures, geographic units, sexual orientation and gender identity (SOGI) measures, and intersectional dimensions such as

race and ethnicity by gender, income, geography, language, disability status, and age. However, MOERJ has not clearly determined which of these disaggregated categories should be minimum requirements for agencies or under what circumstances agencies must collect and publicly share disaggregated data, and has yet to define and establish them as citywide standards.

In the working standards, the City uses expressions such as “should be considered,” “may include,” “can include,” “should collect as appropriate,” “would be encouraged,” and “may be considered as a framework.” This open-ended and non-directive language leaves implementation and considerations of data disaggregation such as the agency’s purpose and capacity, the population represented, data privacy concerns, and the intended analysis at agencies’ own discretion. Agencies may interpret this instruction differently and decide that some categories do not apply to their

work, omitting categories that are crucial for tracking progress in racial equity or, in some cases, data disaggregation practice entirely. Furthermore, the City's reliance on current City policies, such as Executive Order No.45 of 2019, does not comply with the Charter's requirements. Existing policies cannot replace the Charter requirements. Outdated orders, inconsistent agency practice, and varied interpretations are exactly what a citywide standard is meant to avoid.

The Final Racial Equity Plan also makes clear that the City's principles regarding data disaggregation are based on "best practices in equitable data collection and applicable federal statistical guidance." This highlights the importance and urgency of establishing a citywide standard for data disaggregation. While federal statistical guidance provides a valuable technical foundation and demonstrates expertise in the collection, classification, and reporting of demographic data, it should only serve as a source of information and not as a guide to determine NYC's standards for racially equitable disaggregated data. This is especially important given that changes in federal policies and administrative priorities continue to undermine racial equity and the disaggregation of data by race, ethnicity, sexual orientation and gender identity. Changes to federal policies in data collection can directly influence the availability and comparability of the data used to identify and understand disparities in NYC. More specifically, changes to data collection, racial and ethnic categories, or federal reporting practices for Census data

can affect the data available to states and local municipalities like NYC, which rely on Census data for government policymaking, reporting, and the development of the Mayor's Preliminary and Final Racial Equity Plans.

As the Charter requires the City to establish data disaggregation standards, those standards must not be subject to change based on federal priorities and interpretations. NYC must protect and revise its racial equity data infrastructure to ensure the City can measure progress and outcomes over time, even as federal data policies, administrations, and priorities changes. The City's duty to identify racial disparities and to advance racial equity must stay firm regardless of changes at the federal level. For this reason, the data disaggregation standard must be promptly issued and developed in response to the needs and lived experiences of New Yorkers.

Intersectional analysis based on disaggregated data is significant to advancing racial equity because it allows a thorough understanding and reflection of the racial equities and lived experiences among diverse New Yorkers. The Charter's approach to addressing disparities through disaggregated data bridges data and action, from identifying disparities to informing citywide and agency racial equity goals, strategies, implementation, analysis, and reporting on progress toward racial equity.

The City's statement that developing the necessary infrastructure for disaggregated data will "take time"

must not be confused with the need to establish data disaggregation standards themselves. As a city, we cannot put off establishing citywide data disaggregation standards until after the infrastructure is in place. Data disaggregation standards are a prerequisite to building a consistent

and accountable infrastructure for racial equity planning and advancement. New Yorkers should not have to wait until the next planning cycle in January 2028 for the City to establish standards that have long been required by law.





“The agency racial equity plan shall include, at a minimum:

1. Agency-specific goals and strategies for the short-term, to effectuate changes within the following two fiscal years, and for the long-term, to improve racial equity and reduce or eliminate racial disparities within the agency’s jurisdiction, including, but not limited to, how and where the agency provides services, resources, and access;”

– The New York City Charter, Equity, Section 3403(c)(1),(2)

Agency Plan Requirements

The Preliminary and Final Racial Equity Plans for agencies were evaluated at different stages of the Racial Equity Planning Process. Both plans are required to include at least one short-term goal to produce change within two fiscal years and one outcome indicator that measures change in racial equity in resource distribution, service delivery, and service location within the five boroughs. However, the Final Racial Equity Plan does fulfill agency-level plan requirements.

City agencies must provide outcome indicators, that can be measured, to show how the agency is moving towards closing racial equity disparities through changing investment, resources, and access to service delivery. The NYC CORE Response to the Mayor’s Preliminary Racial Equity Plan review of agency plans focused on what community members want agencies to do and whether the agency was responsive to the Community Equity Priorities. NYC CORE expected that recommendations

provided in our response would be included in the Final Racial Equity Plan. Our evaluation of the Final Racial Equity Plan examined whether the plan addressed basic legal requirements and agencies’ responsiveness to community-proposed recommendations.

NYC CORE’s evaluation of agency plans in the Final Racial Equity Plan showed some level of responsiveness to public feedback provided in the NYC CORE Response to the Mayor’s Preliminary Racial Equity Plan. A number of agencies incorporated community feedback, areas of progress, and areas for further development.

Of the 45 agency plans reviewed, NYC CORE Commissioners determined that:

58% incorporated at least one community-proposed recommendation provided in the NYC CORE Response to the Mayor’s Preliminary Racial Equity Plan.

20% did not incorporate at least one community-proposed recommendation provided in the NYC CORE Response to the Mayor's Preliminary Racial Equity Plan.

22% provided insufficient information to determine whether they incorporated at least one community-proposed recommendation provided in the NYC CORE Response to the Mayor's Preliminary Racial Equity Plan.

A Commissioner's determination that there is insufficient information in an agency plan to assess whether the agency incorporated a community-proposed recommendation does not indicate that the agency failed to consider community feedback. Rather, it indicates that the connection between the community-proposed recommendation and a corresponding revision in the agency's plan was not identifiable and could be clarified in a subsequent cycle.

Given the variation across agency plans, we provide high-level findings on overarching patterns across agency plans, rather than granular review of individual agency plans.

Agencies increased data disaggregation in outcome-connected indicators:

Commissioners found that some agency plans demonstrated increased efforts to disaggregate data and identify disparities by race, ethnicity, geography, or other demographics, an improvement from the Preliminary Racial Equity Plan. This progress was reflected in outcome-connected indicators that incorporated disaggregated data to measure progress

toward agency goals. This increased use of disaggregated data reflects agencies' shared recognition of the importance of identifying disparities and measuring outcomes across populations. It also highlights the urgency for the MOERJ to establish citywide data disaggregation standards.

Agencies should expand pathways for community voice in government decision making throughout the policymaking process: Commissioners highlighted the limited integration of community power and presence in agency plans, specifically the lack of agencies' specific mechanisms for community members to provide input and inform government decision making. Although some agency plans broadly mention community engagement, the plans do not detail the pathways, opportunities, and benchmarks for community, particularly Black and Brown New Yorkers from low-income and underserved neighborhoods, to engage, collaborate, and share feedback throughout the development and implementation of the plan. Commissioners recalled how community members, throughout NYC CORE's various community engagements, echoed the importance of having their voices included and valued to impact policy, programming, budgeting, and implementation in every phase of government decision making.

Agencies must shift beyond agency compliance to activities to advance racial equity outcomes: Commissioners expressed concern that agency

plans reflect the regular, day-to-day operational tasks and responsibilities that agencies are already carrying out. Advancing racial equity requires agencies to identify disparities, implement actionable strategies, and achieve outcomes that require fundamental shift in agency operations. Agencies are merely fulfilling and measuring the degree to which they complete standard operational tasks and responsibilities rather than ensuring that New Yorkers' experiences and outcomes have become more equitable.

Agencies must include goals, strategies, and indicators that directly impact Black and Brown New Yorkers: Commissioners drew attention to several agency plans that included limited to no indicators that address racial equity for Black and Brown communities. Indicators need to clearly and explicitly reflect how the agency will have taken action to provide targeted support and implement structural changes to address the racial disparities that exist among Black and Brown New Yorkers. Indicators need to go beyond counting and measuring agency performance to accurately assess structural change of advancing racial equity for Black and Brown communities and other New Yorkers harmed by racism and social injustice. Indicator language needs to clearly define who are underserved to avoid ambiguity.

Agencies must increase data disaggregation outcome-connected indicators: Commissioners reiterated the importance of collecting, analyzing, and sharing disaggregated outcome-

connected indicators to measure and assess meaningful progress in addressing racial disparities. This is foundational to ensuring that the Charter requirements are effective. Although some agencies increased their disaggregated data incorporation in their outcome-connected indicators, others continue to practice limited or no data disaggregation. All agencies must increase their use of disaggregated data outcome-connected indicators.

Agencies must provide justification and rationale for goals: Commissioners noted that agency plans did not provide clear justification for their selection and inclusion of the short-term, medium-term, and long-term goals. They were particularly uncertain about why certain goals were deferred to later years when racial disparities are currently prevalent and require immediate attention. The Racial Equity Plan is an accountability document to all New Yorkers who voted in the racial equity process and as such, must transparently detail the rationale for how and why agencies decide on goals, strategies, and indicators.

Community Response: Equity Priorities

CEP 13	68.0%	Increase access and lower the cost to basic needs such as quality food, transportation, medical, and housing.
CEP 07	64.4%	Expand access to safe, stable housing for those at risk of homelessness, eviction, and deed theft without delay. Access should be available to individuals and families.
CEP 16	60.6%	Ensure all city employees and their agencies, including the police and social service providers, are held accountable for any harm and abuse of power.
CEP 10	60.5%	Reduce racial and economic segregation and education gap by increasing support to schools. Help every student and family with education and other health related social needs.
CEP 11	60.2%	Expand health, mental health, substance use, and disability services. They must meet the needs of families and individuals harmed by racism and social injustice.
CEP 05	55.3%	Check for and remove any formulas and computer processes that may be biased based on race, ethnicity, or poverty. This will prevent inequities in health care, housing, policing, criminal justice, employment, social service and more.
CEP 18	54.7%	Expand services to prevent, intervene, and provide care for people and families harmed by policing, jails, and court supervision.
CEP 02	53.4%	Fund communities harmed by racism and injustice to shape and get updates on NYC government plans.
CEP 17	52.4%	Remove the gaps in racial, gender identity, sexual orientation, age, and disability access to job training and funds to start businesses.
CEP 09	51.8%	Use and expand non-punitive responses to mental health and all crises. These responses should rely less on police where possible. People should be allowed to decide or contribute to decisions about their own care.
CEP 15	51.6%	Remove barriers and increase access for people harmed by racial and social injustice to learn about buy and keep ownership of property.
CEP 03	51.6%	Remove the gaps in race, gender identity, sexual orientation, age, and disability in city pay, promotions, and contracts.
CEP 12	51.1%	Remove costs and barriers to CUNY enrollment and retention.
CEP 01	50.2%	Remove the gaps in race, gender identity, sexual orientation, age, and disability in city jobs. Ensure that government work and staff reflect the city's commitment to equity and social justice.
CEP 08	49.1%	Evaluate and remove fines and fees to reduce the impact on low-income people of all ages.
CEP 14	48.8%	Expand access for those harmed by racial and social injustice to inform local emergency planning. These include plans to prepare for, act in, and recover from emergencies.
CEP 06	44.7%	Collect, analyze, and share data on access to government services with the public, categorizing it by specific groups harmed by racism and social injustice.
CEP 04	43.8%	Ensure NYC offices and partners get funds for community-based language access services in the city's most spoken languages.



“Following the releases of the preliminary citywide racial equity plan and the citywide racial equity plan, the commission shall make public and submit to the mayor and the office of racial equity a statement assessing the extent to which the plan is responsive to the community racial equity priorities and making recommendations...”

– The New York City Charter, Equity, Section 3404(i)(2)

Responsiveness to Community Equity Priorities

The City’s Racial Equity Planning Process begins with the people’s voice through NYC COE’s submission of Community Equity Priorities (CEPs) to MOERJ. Priorities are a set of actions that New Yorkers want government to take to improve their well-being. As part of the Preliminary Racial Equity Plan, the Mayor must provide a response to the CEPs, and the Final Racial Equity Plans should provide the public with information on how the CEPs guided the development of their goals, strategies, and indicators. To date, we have not received a response from the Mayor on the NYC CORE Community Equity Priorities and have not been provided with information detailing how, if at all, the CEPs were considered in the development of the Final Racial Equity Plan.

The NYC Commission on Racial Equity launched the 2024 and 2026 cycles with thousands of New Yorkers to identify 18 Community Equity Priorities that demand government to take immediate action to improve the well-being of Black and

Brown New Yorkers. By law, the Racial Equity Planning Process begins with the people. NYC Charter requires that short-term goals are to be completed or show progress within two years of a single mayoral administration and not tied to any specific Mayor political agenda. New Yorkers, specifically Black and Brown, noted the top three urgent Community Equity Priorities in accordance with the fundamental values of government duties as established through the 2022 ballot measures:

- CEP 13: Increase access and lower the cost to basic needs such as quality food, transportation, medical, and housing.
- CEP 7: Expand access to safe, stable housing for those at risk of homelessness, eviction, and deed theft without delay. Access should be available to individuals and families.

- CEP16: Ensure all city employees and their agencies, including the police and social service providers, are held accountable for any harm and abuse of power.

New Yorkers established fundamental values with corresponding CEPs to guide the Mayor's team and agencies to develop goals, strategies, and outcome indicators that would improve the well-being of New Yorkers, specifically communities harmed by racism and social injustice. The Final Racial Equity Plan referenced the CEPs but did not indicate how the CEPs guided the development of agency or citywide goals, strategies, and indicators. Most concerning is the absence of evidence that government hears and is responding to the ongoing public demand for accountability.

Racial Equity Plans and infrastructure exist because New Yorkers, specifically Black and Brown, continue to lead campaigns for justice and reform. They have made clear that no government official or public servant is above the law or is protected from accountability. However, the Final Racial Equity Plan does not show how key public servants such as law enforcement and social service providers will be held accountable for their actions, if determined to be abuse of their power, or cause injury or death.

CEPs, if utilized by the City and government agencies, can build trust between government and public by holding government accountable. Although all CEPs were noted at least

once, the reference point was made at the end of their plan rather than integrated into their goals, strategies, or indicators. Trust cannot be built if the people's voice is not integrated in government plans, and if they are not accounted for in government measurement.

The 2022 changes in the NYC Charter created a Racial Equity Planning infrastructure that centers community voice and calls for agencies to create new pathways to address immediate concerns raised by New Yorkers about their well-being. Responsiveness to CEPs in this plan, and all future plans, is about showing the people that the government hears them and will work with them to create a better, and stronger New York City, specifically for Black and Brown New Yorkers "that have been historically underrepresented in, or underserved by, government and its processes."



Next Steps

The Mayor's Office of Equity and Racial Justice (MOERJ) must complete the Racial Equity Planning Process every two years. The Final Racial Equity Plan is the beginning of our work to redress longstanding harm to communities, particularly Black and Brown communities. Although the plan is not in compliance, the city has an obligation to proceed with the work and address these concerns during implementation, monitoring, and tracking. The evaluation results noted above, which include the identification of priority neighborhoods and zip codes for targeted investment, data disaggregation standards, and new pathways for community voice, are necessary to closing racial equity disparities in our city.

Over the next few months, the Mayor's Office and all city agencies will begin implementation, and NYC CORE will begin to monitor and track the City's progress. NYC CORE will use the outcome-connected indicator performance data specified in the Final Racial Equity Plan,

along with any subsequent updates from the MOERJ and input it receives from New Yorkers, to identify or revise proposed priorities for the following cycle.

As accountability partners, NYC CORE's work is to ensure the Charter requirements for the racial equity plans process are met. We also believe accountability is stepping up to provide support. NYC CORE remains ready, willing, and able to support the MOERJ and all city agencies as they implement their Final Racial Equity Plans and look forward to joining efforts to launch a new cycle starting October 1, 2027!



NYC CORE
Commission on Racial Equity

NYC CORE Evaluation

of the Mayor's Final Racial Equity Plan