



April 30, 2026

Commissioner Atta-Mensah
Mayor's Office of Equity & Racial Justice
Via email to racialequity@equityoffice.nyc.gov

RE: Comments on 2026 NYC Preliminary Racial Equity Plan

Dear Commissioner Atta-Mensah,

We write to offer comments on the 2016 NYC Preliminary Racial Equity Plan (the Plan). We commend the Mamdani Administration for releasing both the Plan and the True Cost of Living (TCOL) measure within its first one hundred days—a meaningful declaration of its stated commitment to advancing racial and economic justice. We are equally appreciative of the Mayor's Office of Equity and Racial Justice (MOERJ) for the opportunity to engage in this critical process.

FPWA is a leading anti-poverty, social policy, and advocacy organization committed to advancing economic security and strengthening human services organizations and faith institutions across New Yorker. For more than a century, we have worked to dismantle the structural and systemic barriers that perpetuate poverty and inequality and impede economic security and well-being, while strengthening the capacity of human services agencies and faith organizations that serve New Yorkers with low and moderate incomes. Our work is rooted in the belief that all New Yorkers deserve the opportunity to live with dignity, stability, and security.

We recognize the depth of effort that has gone into the development of this Plan. FPWA has been deeply engaged in the work that made this moment possible. In 2021, our CEO and Executive Director, Jennifer Jones Austin, chaired the NYC Racial Justice Commission, which created and advanced the ballot measures mandating both the Racial Equity Plan and True Cost of Living metric. Since then, we have consistently advocated for their realization. While we are encouraged to see these tools now in place, their true value will be determined by the strength and integrity of their implementation.

New York City's history of racial inequality is inseparable from a long-standing pattern of structural economic deprivation—a system in which policy decisions and institutional practices have systematically constrained access to opportunity and wealth for communities of color.¹ Simply put, there can be no racial justice without economic justice.

¹ Coined by Jennifer Jones Austin, structural economic deprivation is defined as a designed system in which public policies, institutional practices, cultural representations and other norms work in various, often reinforcing ways to normalize and enable limitations on the

In that regard, we strongly support the inclusion of the True Cost of Living as a benchmark for addressing income and wealth disparities. As a citywide measure, however, use of the TCOL should not depend on individual agency discretion; rather, it must be adopted as a citywide standard to ensure that all municipal workers can live security in the city.

Further, the City should extend this standard beyond its direct workforce. Each year New York City spends billions of dollars on goods and services provided by external vendors, making the City a larger procuring entity than most states. Given this reach, New York City has both the power and the responsibility to set equitable labor standards across its contracting ecosystem. Incorporating TCOL into procurement and contracting policies would ensure that vendors and nonprofit partners provide wages that support economic security for their workers. This is not only a matter of fairness, it is a strategic investment in the economic health of our communities.

The Preliminary Racial Equity Plan makes clear that addressing the legacy and ongoing impact of racial exclusion will require sustained, intentional action. Centering economic security as a governing standard and ensuring equitable access to just wages and resources is essential to that effort.

We are encouraged by the Administration's commitment and look forward to continued partnership in advancing policies that deliver meaningful, measurable change for all New Yorkers.

Sincerely,



Jennifer Jones Austin
CEO and Executive Director



Madeline Neighly
Chief of Policy & Research

ability of lower income people and communities to access financial, health, education, and social resources that build and sustain wealth, thereby all but ensuring a socioeconomic strata with individuals, families, and communities living perennially in or near poverty.