

July 18th, 2019

New Guidance on EEO-1 Component 2 Reporting Requirements

The Equal Employment Opportunity Commission (EEOC) has long required employers with 100 plus employees (and federal contractors, both prime and first level sub, with 50 plus employees and a federal contract amounting to \$50,000) to report on an annual basis regarding the makeup of their workforce categorized by sex, race/ethnicity and job category ("EEO-1 Report"). In 2016, the EEOC expanded the EEO-1 to include additional information regarding hours worked and wages paid (commonly known as "Component 2 data"). After a series of court-imposed delays, initial Component 2 reporting for 2017 and 2018 is due by September 30, 2019.

The EEOC recently announced that the filing window for the Component 2 pay data opened on July 15th, 2019. The Component 2 data must be submitted online. Employers subject to the requirement can access the EEOC's reporting website here: <https://eeocomp2.norc.org/>. The EEOC also recently released a series of Frequently Asked Questions ("FAQs") (<https://eeocomp2.norc.org/faq>) regarding the new Component 2 data.

The EEOC's 28 FAQs cover a variety of topics including the deadline, filing requirements, summary compensation data, hours worked, multi establishment reporting, online filing system, and confidentiality of data. The FAQs, instructions for filing, a user guide, upload specifications and other information regarding the Component 2 reporting requirements can be found under the "More Info" tab of the EEOC's reporting website. See <https://eeocomp2.norc.org/Info>.

The EEOC is directing employers with questions to contact the help desk at NORC at the University of Chicago, the entity that will be conducting the Component 2 EEO 1 Compensation Data Collection. NORC can be contacted toll free at 877-324-6214 or by email at EEOCompdata@norc.org.

Again, the deadline for EEO-1 Component 2 reporting is September 30, 2019. Employers subject to this requirement should begin preparing now.

Please visit moreton.com/category/compliance-updates for more information and to view other client alerts. This Client Alert was written by Carolyn Cox, Moreton & Company's in-house corporate counsel who provides our clients with compliance services. For additional questions, please contact Carolyn at 801-715-7110 or ccox@moreton.com.

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