

THE
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EEO-1 Component 1 Down ... Component 2 Pay Data Up Next

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The May 31, 2019, deadline for filing EEO-1 Component 1 race-and-gender data has come and gone. The [portal for filing Component 1](#) data will remain open for several more months, however, and there are no fines or penalties for filing late.

EEO-1 Component 2 pay-and-hours-worked data is due by September 30, 2019 (the same day federal contractor VETS-4212 reports are due). However, employers will find nothing on EEOC's website regarding Component 2. For now, only the draft materials and sample forms EEOC published in 2016 are available.

EEOC expects to publish updated materials before the opening of the EEO-1 Component 2 filing portal in mid-July. When open, the portal will be <https://eeocomp2.norc.org/>. EEOC states that it hopes to have an operational helpdesk soon. It will be at EEOCcompdata@norc.org and (877) 324-6214.

Filers should keep in mind the following points for successfully completing the required reports:

- **Two Reports - 2017 and 2018:** covered employers will file two reports; one using the 2017 Component 1 workforce snapshot, and the second using the 2018 workforce snapshot used for 2018 Component 1.
- **W-2, Box 1 Pay Data:** Contrary to the mistaken heading in the draft 2016 forms, do not file "Annual Salary" data. Rather, use 2017 and 2018 yearend W-2, Box 1 pay data to slot each snapshot employee into one of the 12 pay bands in each EEO category.
- **Hours Worked:** For **non-exempt** workers, report aggregate hours worked (or on call) for the number of employees in each cell. Hours worked means just that - excluding paid time on leave, vacation, PTO, and the like and not working. For example, if there are 5 non-minority women in the second pay band in EEO category 3 Technicians, aggregate the total number of hours these women worked for the calendar year in the corresponding cell.

For **exempt** workers, assume that each full-time employee works 40 hours per week and multiply 40 hours per week by the number of weeks in the calendar year each worker was "**employed**" by the reporting company. No need to exclude non-work hours. For part-timers, assume each worked 20 hours per week and multiply by the number of weeks "**employed.**" For example, if there are 5 Black men in the first pay band of EEO category 2 Professionals, calculate for each employee 40/20 hours/week multiplied by the number of weeks he was employed, aggregate the figures for the 5 men, and provide that data in the appropriate cell. There will be much work involved to pull the pay, hours worked, and race/gender data from multiple systems, reconcile the data, and determine hours worked and weeks employed. We will provide updates as they are available.

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