

The 2024 EEO-1 Component 1 Data Collection: Purpose, Clarification, and Time to Report

Alert

05.22.2025

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On May 20, 2025, the U.S. Equal Employment Opportunity Commission (EEOC) announced that the 2024 EEO-1 Component 1 data collection window is now open. The timeframe for covered employers to file the report is shorter than in past years, with the deadline to file set for Tuesday, June 24, 2025. Additionally, all communications to filers will be electronic rather than sent via postal mail.

In a simultaneous announcement dated May 20, 2025, the EEOC's Acting Chair Andrea R. Lucas provided additional clarification on the purpose of the EEO-1 Component 1 reporting and to whom the requirement applies.

Current EEOC regulations require covered entities to annually report on both the sex and the race and/or ethnicity of their employees. The announcement states the EEOC's position that this data helps to prevent and combat unlawful race, ethnicity, and sex discrimination, and it helps expand merit-based opportunity for all. However, an employer cannot use the data collected for EEO-1 Component 1 reports in order to facilitate discrimination against employees based on their race, sex, or any other protected characteristic in violation of Title VII of the Civil Rights Act.

In its announcement, the EEOC reaffirmed its commitment to collecting this data in wake of changes in the agency's priorities in recent months under the Trump administration. The EEO-1 Component 1 data collection and reporting remains a lawful practice and an ongoing obligation for covered entities.

Under current EEOC regulations, the following employers are required to file their EEO-1 Component 1 reports by the deadline:

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- Private employers that are subject to Title VII and have 100 or more employees.
- Federal contractors that have 50 or more employees and a contract, subcontract, or purchase order of \$50,000 or more.

Covered employers with questions or concerns about the requirements and how to comply can check the EEOC guidelines. The EEOC has posted its 2024 EEO-1 Component 1 Instruction Booklet on its dedicated website at www.eeocdata.org/eeo1.

Covered employers and federal contractors are strongly encouraged to work with their counsel to ensure compliance with the administration's executive orders and agency guidance. For more information, please contact Patrick Busch, Amy Conway, April Petrosino, Stephanie Scheck, or the Stinson LLP contact with whom you regularly work.

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