

CLIENT ALERT: EEO-1 Component 1 Online Data Collection System Is Opened, Accompanied by Message Regarding Agency Priorities

On May 20, 2025, the U.S. Equal Employment Opportunity Commission (“EEOC”) **announced** the opening of its 2024 EEO-1 Component 1 Data Collection. EEO-1 Component 1 reports provide workforce demographic data, specifically the number of individuals employed by job category and the sex and race or ethnicity of those employees. Private employers with 100 or more employees and certain federal contractors with 50 or more employees are required to file their annual EEO-1 Component 1 reports by **June 24, 2025**. The EEO-1 Component 1 Data Collection Instruction Booklet can be found [here](#), and FAQs on the EEO-1 Component 1 Data Collection can be found [here](#).

In a message accompanying the opening of the data collection, EEOC Acting Chair Andrea Lucas emphasized the EEOC’s commitment to “preventing and combatting unlawful race and sex discrimination; expanding individual, merit-based opportunity for all; and ensuring even-handed civil rights enforcement.” Acting Chair Lucas also took this opportunity to remind employers that they may not “take any employment actions based on, or *motivated in whole or in part* by, employee’s race, sex, or other protected characteristics.” The Acting Chair stated that there is no “diversity” exception to Title VII’s requirements of non-discrimination, and cautioned employers not to use any of the information collected for the EEO-1 Component 1 to justify treating any employee differently on the basis of race, sex, or any other protected characteristic.

The message accompanying the EEO-1 collection information also stated that the EEOC will de-prioritize investigations into disparate impact practices (*i.e.*, neutral employment practices that lead to differing consequences based on race, sex, or any other protected characteristic) in favor of addressing intentional discrimination claims.

Employers with questions about EEO-1 reporting or other workplace policies and practices should contact their MBJ attorney for advice on compliance and best practices.

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