
Show Me the Money: EEOC Requires Pay Data by September 30

JULY 12, 2019

As we alerted you in April, the Equal Employment Opportunity Commission (EEOC) extended the deadline for its new pay data reporting requirement from May 31, 2019 to September 30, 2019. As a reminder, this new requirement mandates that, as part of their EEO-1 filings, covered employers will be required to report “Component 2” data for all employees, *i.e.* wage-related information and total hours worked, broken down by salary band for gender, race, and ethnicity. Notably, for the inaugural 2019 submission, covered employers will be required to submit the Component 2 data for *both* the 2017 and 2018 calendar years.

In anticipation of the nearing deadline, the EEOC has begun to release information to the public and has plans to provide more information and access in the very near future:

- The EEOC has already published an [instruction booklet](#), a [sample form](#), [FAQs](#), and a [fact sheet](#) to guide employer submissions of employee pay data.
- Today, the EEOC is set to send employers the necessary log-in information to the on-line portal through which employers will be expected to submit their Component 2 data.
- On Monday, July 15, the portal, which is located at eeocomp2.norc.org, is expected to go live.

Although we cannot rule out the possibility of a further delay or modification, we recommend that, to the extent they have not already done so, employers begin in earnest collecting and preparing data in preparation for the September 30 deadline.

For more information or assistance in reviewing or revising your current pay practices and reporting procedures, please contact a member of WilmerHale’s HR Services Group, which is part of WilmerHale’s [Labor and Employment](#) team.

Authors



**Jonathan
Rosenfeld**

RETIRED PARTNER

✉ jonathan.rosenfeld@wilmerhale.com

☎ +1 617 526 6000



Laura E. Schneider

PARTNER

Chair, Labor and Employment
Practice

✉ laura.schneider@wilmerhale.com

☎ +1 617 526 6846



Andrew Stauber

PARTNER

✉ andrew.stauber@wilmerhale.com

☎ +1 617 526 6815