

Blog Post

Time's Ticking: How to Tackle the 2024 EEO-1 Filing Before the Deadline!

May 22, 2025

By Reeya Khurana

The 2024 EEO-1 data collection period is officially open, and the clock is ticking! If you're an employer who's required to file, mark your calendars — the **filing deadline is June 24, 2025**. But here's the catch: the reporting window is shorter than usual, and the EEOC has made it clear there will be no extensions. Plus, all communications this year will be electronic — so no paper notices will be sent. Let's dive into what you need to know.

Who Needs to File?

If you're a private employer with 100 or more employees, you're required to submit the EEO-1 report annually. And it's not just private employers — federal contractors with 50 or more employees are also required to file.

Despite the rescission of Executive Order 11246 on January 21, 2025, which previously required federal contractors to have affirmative action programs to ensure equal opportunity in employment, the EEOC's 2024 EEO-1 Instruction Booklet and sample 2024 EEO-1 report confirm that federal contractors meeting the 50+ employee threshold are still expected to file their EEO-1 reports for the 2024 cycle.

What's New for 2024?

Related People

Reeya Khurana

Related Work

Employment
Administrative Claims
Defense

Employment Training
and Compliance
Labor and Employment

Related Offices

New York

HR Defense

Akerman Perspectives
on the Latest
Developments in Labor
and Employment Law

[Visit this Akerman blog](#)

A few key changes this year could affect how you prepare your submission:

- 1. Nonbinary Option Removed:** The 2024 EEO-1 Instruction Booklet no longer includes an option to report nonbinary employees. You'll now only report as "male" or "female" in accordance with Executive Order 14168, which restricts agency forms from requesting data collection on gender identity.
- 2. No Extensions:** This year, the EEOC has removed the notice of failure to file letter that was typically sent to employers with incomplete or unfiled reports. Once the June 24, 2025 deadline passes, there will be no grace period — employers who fail to file will be deemed out of compliance.
- 3. New Process for Undue Hardship Requests:** If filing the EEO-1 report would create an undue hardship, employers can submit a written exemption application to the EEOC. However, applications must be postmarked on or before June 24, 2025 — no exceptions. You'll need to provide detailed facts and documentation explaining why filing is a hardship. While the application is pending, employers must continue to collect and prepare the required data in case the exemption request is denied. Exemption applications must be submitted in writing and sent to the EEOC's Office of Enterprise Data and Analytics (ODEA) at 131 M Street NE, Washington D.C. 20507.

How to Prepare for the EEO-1 Filing

Preparation is key! Here's a step-by-step breakdown of what you'll need to do:

- 1. Pick Your Snapshot Date:** The EEO-1 report requires employers to select a payroll end date between October 1 and December 31 to serve as your "workforce snapshot period." You'll report all employees as of this date. If you reached 100+ employees during the fourth quarter of 2024, make sure you file.

2. Categorize Your Workforce: The EEOC breaks down employee job titles into categories for reporting. Make sure your workforce is correctly classified under these categories:

1. Executive/senior-level officials and managers
2. First/mid-level officials and managers
3. Professionals
4. Technicians
5. Sales workers
6. Administrative support workers
7. Craft workers
8. Operatives
9. Laborers and helpers
10. Service workers

3. Collect Employee Data: In addition to job categories, you must report each employee's race, ethnicity, and sex. The EEOC's race/ethnicity categories include:

1. Hispanic or Latino
2. White (not Hispanic or Latino)
3. Black or African American (not Hispanic or Latino)
4. Native Hawaiian or other Pacific Islander (not Hispanic or Latino)
5. Asian (not Hispanic or Latino)
6. American Indian or Alaska Native (not Hispanic or Latino)
7. Two or more races (not Hispanic or Latino)

4. Designate an Account Holder: Choose an employee to serve as the account holder for the EEO-1 filing. This person will be responsible for entering data into the EEO-1 Component 1 Online Filing System (OFS). The account holder will either manually enter data or upload a file, and

the certifying official will then need to certify the report electronically.

5. **File On Time:** The deadline is June 24, 2025, but there's no harm in filing early! Be sure to meet this deadline to avoid penalties and compliance issues.

What If You Have Multiple Establishments?

The EEOC defines a single-establishment employer as an employer with a single establishment where business is conducted or where services or industrial operations are performed. Whereas, a multi-establishment employer is an employer with more than one establishment where business is conducted or where services or industrial operations are performed.

The filing process is slightly different for employers with more than one establishment:

- Single-establishment employers must submit only one EEO-1 report.
- Multi-establishment employers must submit three types of reports:
 - Consolidated Report;
 - Headquarters Report; and
 - Establishment-Level Report(s) for each location.

Start Preparing Today!

With the June 24, 2025, filing deadline fast approaching, it's crucial to begin preparing now to avoid any last-minute stress. The changes to the reporting process mean you need to be more organized than ever, but if you get started early, you'll have plenty of time to meet the deadline.

If you need any help with gathering or submitting your workforce data, don't hesitate to reach out to your Akerman labor and employment attorney for assistance!

This information is intended to inform firm clients and friends about legal developments, including recent decisions of various courts and administrative bodies. Nothing in this Practice Update should be construed as legal advice or a legal opinion, and readers should not act upon the information contained in this Practice Update without seeking the advice of legal counsel. Prior results do not guarantee a similar outcome.