



Revised EEO-1 Form: Are You Ready?

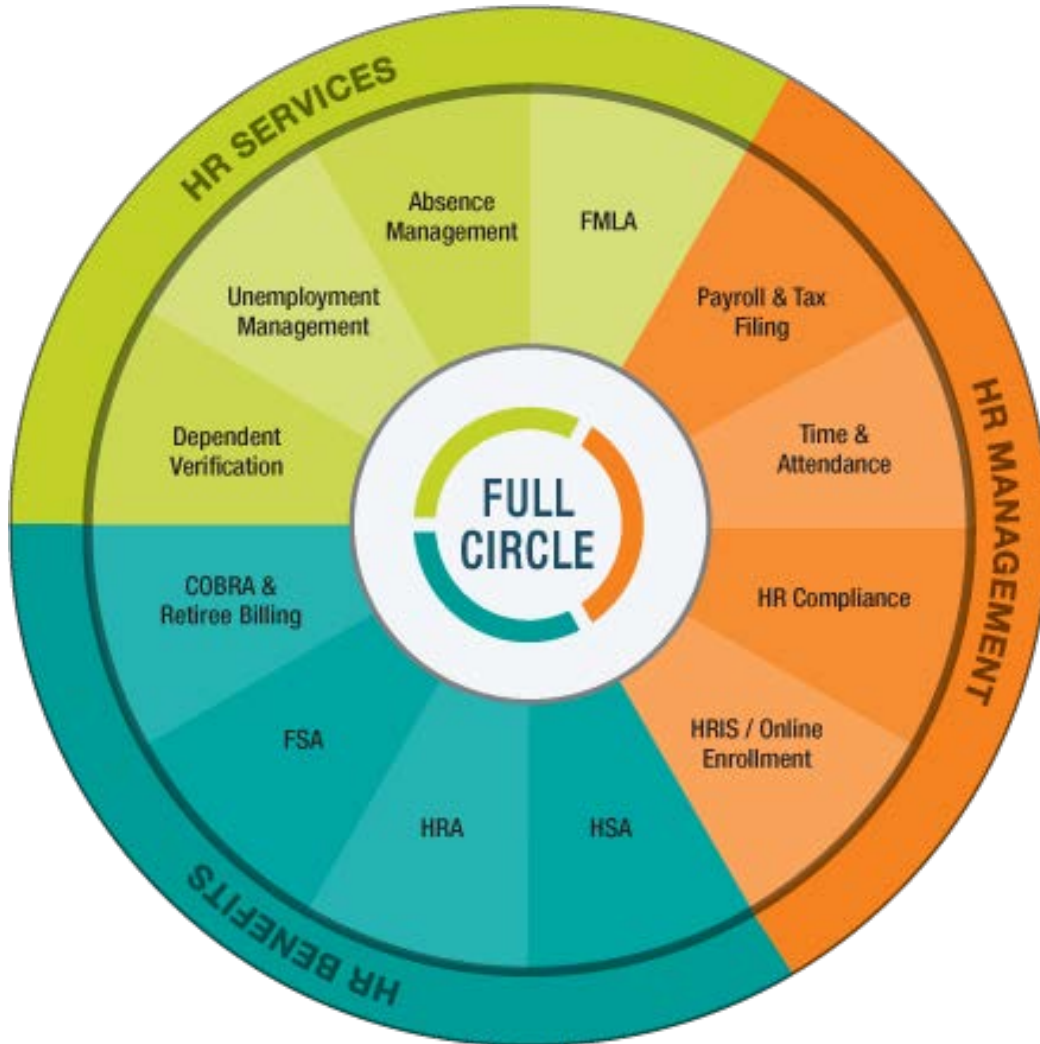
Presented by: Gary A. Chamberlin



- HR Benefits
- HR Management
- HR Services

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Keep it BASIC.

BASIC's integrated HR solutions come full circle for employers nationwide. Consistently recognized as an Inc. 5,000 Fastest Growing Private Company, our expertise allows you to control costs, manage risks and improve staff focus and effectiveness.



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Before acting on the basis of any information or material, readers who have specific questions or problems should consult their lawyer.



EEO-1 REPORT HISTORY AND BASICS

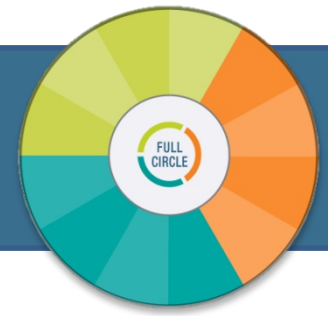
EEO-1 Reports



- Employer Information Reports (EEO-, or Standard Form 100)
- 1966: EEOC first requires EEO-1 reports
- Reports profile 25 million employees and 45,000 employers
- After first reports submitted, EEOC sponsors a series of public hearings between 1967 – 1971 to discuss data
- EEOC gathers information from individual workers regarding discrimination against minorities
- EEOC begins pattern of requiring reports annually and its charge enforcement process



Employer Information Reports (EEO-1 / Standard Form 100)



- Who is covered?
 - All employers with 100 or more employees
 - Federal contractors
 - At least 50 employees
 - Federal contract / purchase order of at least \$50,000 annually
 - Banks and financial institutions that serve as a federal depository in any amount, or have FDIC insurance (*formerly also included transaction of U.S. Savings Bonds, which is now done online*)

Pre-2017 Reporting



- Forms available from Joint Reporting Committee or EEOC web-site (eEOC.gov)
- When to report:
 - 2016 and before = Due date was September 30 each year
- What to report:
 - 2016 and before = “Snapshot” of workforce during any payroll period July-September

September 2016

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	

The date 30 is circled in red with the text 'EEOC' written across it.

Multiple Establishment Employers – Separate EEO-1's



- Principal or Headquarters Report
- Establishment Reports for each facility with 50 or more employees
- List identifying each facility with less than 50 employees, total employment, address and principal activity, or a small establishment Report
- Consolidated Report

EEO-1 Occupational Categories



10 EEO occupational categories (typically an EEO category is determined and assigned to each job title in HRIS)

- 1.1 Executive / Senior Level Officials and Managers
- 1.2 First / Mid-Level Officials and Managers
- 2 Professionals
- 3 Technicians
- 4 Sales Workers

EEO-1 Occupational Categories



- 5 Administrative Support Workers
- 6 Craft Workers
- 7 Operatives
- 8 Laborers and Helpers
- 9 Service Workers



Racial / Ethnic Classifications



- Hispanic or Latino (yes or no)
 - If yes, stop.
 - If no, then:
 - White (not Hispanic or Latino)
 - Black or African American
(not Hispanic or Latino)

Racial / Ethnic Classifications



- Native Hawaiian or Other Pacific Islander (not Hispanic or Latino)
- Asian (not Hispanic or Latino)
- American Indian or Alaska Native (not Hispanic or Latino)
- Two or more races (not Hispanic or Latino)
 - Employees do not have to disclose which two or more races

EEO-1 Race / Ethnicity Identification



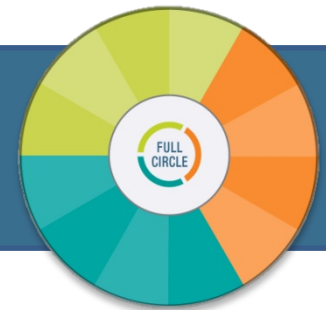
- Based on data from 2000 US Census
- EEOC strongly prefers voluntary self-disclosure by employees, and visual identification may be used only if employee declines to self-identify
 - “If I think I know an employee’s ethnicity, can I just write that in on the report?”
 - *“No. Self-identification is the preferred method of identifying the race and ethnic information necessary for the EEO-1 report. Employers are required to attempt to allow employees to use self-identification to complete the EEO-1 report. If an employee declines to self-identify, employment records or observer identification may be used.”*

EEOC’s EEO-1 Report Frequently Asked Questions



“OLD” EEO-1 FORM

Employer Information Report For EEO-1



Simple 2-Page Form Cover Sheet

- Joint Reporting Committee
- Equal Employment Opportunity Commission
- Office of Federal Contract Compliance Programs (Labor)

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER INFORMATION REPORT EEO-1

Standard Form 100
REV. 01/2008
G.M.S. No. 3048-2007
FORM APPROVAL: www.regInfo.gov/public/do/PRAMain
169-214

Section A—TYPE OF REPORT
Refer to instructions for number and types of reports to be filed.

1. Indicate by marking in the appropriate box the type of reporting unit for which this copy of the form is submitted (MARK ONLY ONE BOX).

(1) Single-establishment Employer Report

(2) Consolidated Report (Required)

(3) Headquarters Unit Report (Required)

(4) Individual Establishment Report (submit one for each establishment with 50 or more employees)

(5) Special Report

2. Total number of reports being filed by this Company (Answer on Consolidated Report only)

Section B—COMPANY IDENTIFICATION (To be answered by all employers)

1. Parent Company

a. Name of parent company (owns or controls establishment in item 2) omit if same as label

Address (Number and street)

City or town State ZIP code

2. Establishment for which this report is filed. (Omit if same as label)

a. Name of establishment

Address (Number and street) City or Town County State ZIP code

b. Employer identification No. (IRS 9-DIGIT TAX NUMBER)

c. Was an EEO-1 report filed for this establishment last year? Yes No

Section C—EMPLOYERS WHO ARE REQUIRED TO FILE (To be answered by all employers)

Yes No 1. Does the entire company have at least 100 employees in the payroll period for which you are reporting?

Yes No 2. Is your company affiliated through common ownership and/or centralized management with other entities in an enterprise with a total employment of 100 or more?

Yes No 3. Does the company or any of its establishments (a) have 50 or more employees AND (b) is not exempt as provided by 41 CFR 60-1.5, AND either (1) is a prime government contractor or first-tier subcontractor, and has a contract, subcontract, or purchase order amounting to \$50,000 or more, or (2) serves as a depository of Government funds in any amount or is a financial institution which is an issuing and paying agent for U.S. Savings Bonds and Savings Notes?

If the response to question C-3 is yes, please enter your Dun and Bradstreet identification number (if you have one):

NOTE: If the answer is yes to questions 1, 2, or 3, complete the entire form, otherwise skip to Section G.

Employer Information Report For EEO-1



Report "Grid"

Section D - EMPLOYMENT DATA

SF 100 - Page 2

Employment at this establishment - Report all permanent full- and part-time employees including apprentices and on-the-job trainees unless specifically excluded as set forth in the instructions. Enter the appropriate figures on all lines and in all columns. Blank spaces will be considered as zeros.

Job Categories	Number of Employees (Report employees in only one category)														Total Col A - N
	Race/Ethnicity														
	Hispanic or Latino		Not-Hispanic or Latino												
	Male	Female	Male					Female							
A	B	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	O	
Executive/Senior Level Officials and Managers 1.1															
First/Mid-Level Officials and Managers 1.2															
Professionals 2															
Technicians 3															
Sales Workers 4															
Administrative Support Workers 5															
Craft Workers 6															
Operatives 7															
Laborers and Helpers 8															
Service Workers 9															
TOTAL 10															
PREVIOUS YEAR TOTAL 11															

1. Date(s) of payroll period used: _____ (Omit on the Consolidated Report.)

Section E - ESTABLISHMENT INFORMATION (Omit on the Consolidated Report)

1. What is the major activity of this establishment? (Be specific, i.e., manufacturing steel castings, retail grocer, wholesale plumbing supplies, title insurance, etc. Include the specific type of product or type of service provided, as well as the principal business or industrial activity.)

Section F - REMARKS

Use this item to give any identification data appearing on the last EEO-1 report which differs from that given above, explain major changes in composition of reporting units and other pertinent information.

Section G - CERTIFICATION

Check one All reports are accurate and were prepared in accordance with the instructions. (Check on Consolidated Report only.)
 This report is accurate and was prepared in accordance with the instructions.

Name of Certifying Official	Title	Signature	Date
Name of person to contact regarding this report	Title	Address (Number and Street)	
City and State	Zip Code	Telephone No. (Including Area Code and Extension)	Email Address

All reports and information obtained from individual reports will be kept confidential as required by Section 709(e) of Title VII. WILLFULLY FALSE STATEMENTS ON THIS REPORT ARE PUNISHABLE BY LAW, U.S. CODE, TITLE 18, SECTION 1001



2016 EEOC PROPOSAL

Revised EEO-1 Report



- In September 2016, EEOC approved and published proposal outlining major changes to annual EEO-1 reporting
 - Applies to **all employers with 100 or more employees**, regardless of whether a federal contractor/contractor
 - Wages/hours worked reporting does NOT apply to federal contractors/subcontractors with 50-99 employees

Revised EEO-1 Report



- What's new?
 - **Summary Pay Data**
 - Employers report the total number of full and part-time employees in each of 12 pay bands for each EEO-1 occupational, sex and race/ethnicity category
 - **Hours Worked Data**
 - Aggregate number of hours worked by all employees in each pay band

Emp No.	Hours	Pay
13	23	\$20,289
14	21	\$18,555
15	65	\$56,703
16	51	\$44,565
17	65	\$567,366
18	65	\$56,703
19	65	\$56,703
20	65	\$56,703
21	65	\$56,703

Revised EEO-1 Report



- Kicks in with the 2017 EEO-1 reporting period
 - Employee headcount to be reported is based on any payroll period selected during October 1- December 31, 2017 (the “workforce snapshot period”)
 - Does workforce fluctuate above/below 100 during Oct. – Dec.? Employer discretion to select “snapshot” time frame

Revised EEO-1 Report



- Employees on payroll during “workforce snapshot period” are reported on EEO-1 even if no longer employed as of December 31, 2017
- New deadline for submitting EEO-1 Report is now **March 31, 2018**



EARNINGS DATA

Summary Pay Data



- All forms of compensation for each employee
 - Wages, salaries, bonuses, commissions, tips, shift premiums, holidays, vacations, taxable fringe benefits, severance pay, signing bonuses, cost of living adjustments, etc.
 - Incentive compensation is reported in the year PAID (and reported for W-2 purposes), and not the period for which it represents

Summary Pay Data



- To determine compensation, use calendar year-end W-2 earnings reported for income tax purposes (Box 1)



- *Note:* federal contractors with 50-99 employees get a break – not required to provide pay or aggregate hours worked data

Summary Pay Data



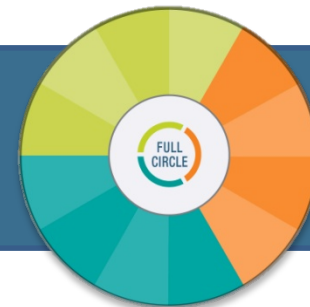
– Annual W-2 earnings by 12 EEO-1 Report pay bands

- (1) \$19,239 and under;
- (2) \$19,240 - \$24,439;
- (3) \$24,440 - \$30,679;
- (4) \$30,680 - \$38,999;
- (5) \$39,000 - \$49,919;
- (6) \$49,920 - \$62,919;
- (7) \$62,920 - \$80,079;
- (8) \$80,080 - \$101,919;
- (9) \$101,920 - \$128,959;
- (10) \$128,960 - \$163,799;
- (11) \$163,800 - \$207,999; and
- (12) \$208,000 and over.

Summary Pay Data



- Do not calculate or estimate annualized earnings for employees hired mid-stream in year – use calendar year W-2 earnings reported for income tax purposes (Box 1)
- EEOC position is that aggregate hours worked data will even out the “missing” earnings data reported



HOURS WORKED DATA

Hours Worked Data



- Aggregate of annual hours worked by all employees reported in the pay band
- Non-exempt employees – based on actual time worked (time sheet/payroll records) to identify the number of hours worked.
 - Only hours actually worked are reported, not all hours paid (thus, not vacation, PTO, sick time, holidays, etc.)

Hours Worked Data



- Annual aggregate hours worked
- Exempt employees - employers have a choice:
 - (1) Report a proxy amount of 40 hours per week for each full-time exempt employee, or 20 hours per week for each part-time exempt employee (*are there really PT exempt employees paid at the full FLSA salary basis threshold?*); or
 - (2) Report actual number of hours worked by exempt employees, regardless of full- or part-time



OTHER EEO-1 REPORT ISSUES

New 2017 EEO-1 Reporting



- Now will require slotting employees into one of **1,680** possible cells in EEO-1 Report
 - **10** Occupation categories
 - **2** Gender categories
 - **7** race/ethnicity categories
 - **12** pay bands

10 x 2 x 7 x 12 = 1,680 each for employees and hours worked data

EEO-1 Report



- EEOC and OFCCP will have joint access to the information reported (OFCCP is subject to FOIA)
- Agencies claim they will use the information to analyze pay claims, focus investigations, target audits, and identify employers with allege pay disparities

EEO-1 Reports



- **EEOC states**

- “The EEOC does statistical analysis of EEO-1 data early in its investigations. This helps with a first assessment of the allegations made in a charge of discrimination and, as appropriate, with planning an investigation. The EEO-1 is not the only source of data used at this stage, but it certainly helps.”





- **OFCCP States**

- OFCCP will use the EEO-1 data to help identify federal contractors and subcontractors for compliance reviews under Executive Order 11246
- This is part of OFCCP's Federal Contractor Selection System



Published Industry Data



- EEOC states
 - In addition, the EEOC will periodically **publish aggregated EEO-1 data and industry reports** that may provide useful comparative data for private employers and federal contractors. Small employers will especially benefit from the published reports because they will obtain comparative data that will assist them in conducting voluntary self-assessment of their pay practices.
 - Voluntary self-assessment will help small businesses remedy any pay disparities and comply with state and federal equal pay laws.”

Actual Utility of EEO-1 Data?



- What will EEOC do with aggregate pay data? (citing ability to get “clear picture” of employer discriminatory pay practices)
- Who knows? *2012 National Academy of Sciences report on collecting pay data: Even if collected, “There is . . . no clearly articulated vision of how the data on wages could be used in the enforcement responsibilities of [EEOC & OFCCP] for targeting employers for investigation regarding their compliance with non-discrimination laws.”*

Why Gather This Data?



- Many special interest groups have objected to collecting pay and hours worked data
 - *U.S. Chamber of Commerce*
 - *SHRM*
 - *Republican Senators*

Why Gather This Data?



- “Collecting pay data is a significant step forward in addressing discriminatory pay practices.”
- “This information will assist employers in evaluating their pay practices to prevent pay discrimination and strengthen enforcement of our federal anti-discrimination laws.”

Former EEOC Chair Jenny Yang

Why Gather This Data?



- "Collecting pay data in the highly aggregated manner proposed will not help identify unlawful pay discrimination."
- "Over time, pay is increasingly influenced by an employee's chosen career path—previous jobs, experience, education, performance and geographic locations, along with level of responsibility."

Janese Murray, Vice President of Diversity and Inclusion at Exelon Corp.

EEO-1 Data Security Concerns



- Employers - Concerns over confidentiality of pay data to be reported, especially in single employee race/sex occupational categories (OFCCP is subject to FOIA)
- “All information that the EEOC collects under Title VII is subject to strict confidentiality requirements. Title VII prohibits any EEOC officer or employee from disclosing data collected on the EEO-1 report, unless the data is the subject of litigation.”
- “The EEOC maintains robust cybersecurity and privacy programs The hosting service for the EEO-1 data collection system provides a defense-in-depth security program with many layers of security . . . in order to maintain a high level of protection.”

(EEOC's 2017 EEO-1 Survey Website Link)



EEOC POLITICS

Support and Opposition



- Ivanka Trump, at 2016 Republican Convention, cited wage equality at Trump businesses, and her father's fight for equal pay for equal work
- Current (and soon to be former) Acting EEOC Chair Victoria Lipnic voted against program in 2016, and in Feb. 2017 publically expressed doubt about its usefulness



EEOC Commission Dynamics



- New Republican majority expected on EEOC
 - **Victoria Lipnic**, Acting Chair (R) (7/1/2020)
 - **Chai Feldblum** (D) (7/1/2018)
 - **Jenny Yang** (D) (7/1/2017) (*-serving expired / extended term and soon to be replaced*)
 - **Charlotte Burrows** (D) (7/1/2019)
 - Vacant – **Janet Dhillon** (R) nominated by Trump as Commissioner and new Chair on June 29, 2017
 - **July 31, 2017**: Trump nominated **Daniel Gade** to replace Jenny Yang on Commission (7/1/2021)

EEO-1 Reports



- **What will Trump Administration do?**
Wild Card.
- Since involves all employers covered by EEO-1 Report program, has momentum behind it
- Industry groups and Congressional Republicans have cited administrative burden combined with lack of clear data utility plan
- But larger employers are well underway in compliance logistics – HRIS and payroll



Crystal Ball?



- Complete repeal of program by EEOC Republican majority late in 2017?
- No repeal, but perhaps be scaled back or postponed beyond 2017 pending further study of pay data's usefulness?
- Congressional budgetary prohibition on using EEOC or OFCCP funds to administer new EEO-1 Report changes?
- Full speed ahead?





“NEW” EEO-1 FORM

Proposed EEO-1 Form To Collect Pay Data



SECTION A - TYPE OF REPORT

1. Indicate by marking in the appropriate box the type of reporting unit for which this copy of the form is submitted (MARK ONLY ONE BOX).

- | | |
|---|--|
| <input type="checkbox"/> Single-establishment Employer Report | <input type="checkbox"/> Multi-establishment Employer:
<input type="checkbox"/> Consolidated Report (Required)
<input type="checkbox"/> Headquarters Unit Report (Required)
<input type="checkbox"/> Individual Establishment Report (submit one for each establishment with 50 or more employees)
<input type="checkbox"/> Special Report |
|---|--|

2. Total number of reports being filed by this Company (Answer on Consolidated Report only):

SECTION B - COMPANY IDENTIFICATION

1. Name of parent company that owns or controls establishment in item 2 (omit if same as above).

a. Parent Company:

Address (Number and Street):

City or Town:

State:

ZIP code:

2. Establishment for which this report is filed (omit if same as above)

a. Name of Establishment:

Address (Number and Street):

City or Town:

County:

State:

ZIP code:

b. Employer Identification No. (IRS 9-DIGIT TAX NUMBER):

c. Was an EEO-1 report filed for this establishment last year?

Yes No

SECTION C - EMPLOYERS WHO ARE REQUIRED TO FILE

1. Does the entire company have at least 100 employees in the payroll period for which you are reporting?

Yes No

2. Is your company affiliated through common ownership and/or centralized management with other entities in an enterprise with a total employment of 100 or more?

Yes No

3. Does the company or any of its establishments (a) have 50 or more employees AND (b) is not exempt as provided by 41 CFR 60-1.5, AND either (1) is a prime government contractor or first-tier subcontractor, and has a contract, subcontract, or purchase order amounting to \$50,000 or more, or (2) serves as a depository of Government funds in any amount or is a financial institution which is an issuing and paying agent for U.S. Savings Bonds and Savings Notes?

Yes No

4. If the response to the above question (C - 3) is Yes, please enter your Dun and Bradstreet identification number (if you have one):

NOTE: If an answer to questions 1, 2 or 3 of Section C is "Yes", complete the entire form, otherwise skip to Section G.

Proposed EEO-1 Form To Collect Pay Data



Report numbers of full-time and part-time employees by:

- EEO occupation category
- Salary in thousands USD
- Gender
- Race / ethnicity

SECTION D - EMPLOYMENT DATA

Employment at this establishment - Report all permanent full- and part-time employees including apprentices and on-the-job trainees unless specifically excluded as set forth in the instructions. Enter the appropriate figures on all lines and in all columns. Blank spaces will be considered as zeros.

Job Categories	Annual Salary in Thousands	Number of Employees (Report employees in only one category)														Total Col A-N
		Race/Ethnicity														
		Hispanic or Latino		Non-Hispanic or Latino								Female				
		Male	Female	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More races	
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O		
Executive/Senior Level Officials and Managers 1.1	1. \$19,239 and under															
	2. \$19,240 - \$24,439															
	3. \$24,440 - \$30,679															
	4. \$30,680 - \$38,999															
	5. \$39,000 - \$49,919															
	6. \$49,920 - \$62,919															
	7. \$62,920 - \$80,079															
	8. \$80,080 - \$101,919															
	9. \$101,920 - \$128,959															
	10. \$128,960 - \$163,799															
	11. \$163,800 - \$207,999															
	12. \$208,000 and over															
First Mid-Level Officials and Managers 1.2	13. \$19,239 and under															
	14. \$19,240 - \$24,439															
	15. \$24,440 - \$30,679															
	16. \$30,680 - \$38,999															
	17. \$39,000 - \$49,919															
	18. \$49,920 - \$62,919															
	19. \$62,920 - \$80,079															
	20. \$80,080 - \$101,919															
	21. \$101,920 - \$128,959															
	22. \$128,960 - \$163,799															
	23. \$163,800 - \$207,999															
	24. \$208,000 and over															
Professionals 2	25. \$19,239 and under															
	26. \$19,240 - \$24,439															
	27. \$24,440 - \$30,679															
	28. \$30,680 - \$38,999															
	29. \$39,000 - \$49,919															
	30. \$49,920 - \$62,919															
	31. \$62,920 - \$80,079															
	32. \$80,080 - \$101,919															
	33. \$101,920 - \$128,959															
	34. \$128,960 - \$163,799															
	35. \$163,800 - \$207,999															
	36. \$208,000 and over															

SAMPLE

Proposed EEO-1 Form To Collect Pay Data



Same “grid” framework,
but for reporting
aggregate hours worked
by pay band, sex and
race/ethnicity

SECTION D - EMPLOYMENT DATA

Employment at this establishment - Report all permanent full- and part-time employees including apprentices and on-the-job trainees unless specifically excluded as set forth in the instructions. Enter the appropriate figures on all lines and in all columns. Blank spaces will be considered as zeros.

Job Categories	Annual Salary in Thousands	For each cell provide the TOTAL Number of Hours worked in last year														Total Col. A-N
		Race/Ethnicity														
		Hispanic or Latino		Non-Hispanic or Latino							Female					
		Male	Female	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More races	
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O		
Executive/Senior Level Officials and Managers 1.1	1. \$19,239 and under															
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	11. \$163,800 - \$207,999															
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	First/Mid-Level Officials and Managers 1.2	13. \$19,239 and under														
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Professionals 2		25. \$19,239 and under														
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	29. \$39,000 - \$49,919															
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	35. \$163,800 - \$207,999															
	36. \$208,000 and over															

SAMPLE

Proposed EEO-1 Form To Collect Pay Data



Establishment description and preparer certification

Date(s) of payroll period used: (Omit on the Consolidated Report)

SECTION E - ESTABLISHMENT INFORMATION
(Omit on the Consolidated Report)

What is the major activity of this establishment? (Be specific, i.e., manufacturing steel castings, retail grocer, wholesale plumbing supplies, title insurance, etc. Include the specific type of product or type of service provided, as well as the principal business or industrial activity.)

SECTION F - REMARKS

Use this item to give any identification data appearing on the last EEO-1 report which differs from that given above, explain major changes in composition of reporting units and other pertinent information.

SECTION G - CERTIFICATION

SAMPLE

Check One:

1. All reports are accurate and were prepared in accordance with the instructions, directions and the report cover.

2. This report is accurate and was prepared in accordance with the instructions and the report cover.

Name of Certifying Official	Title	Signature	Date
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Name of Person to contact regarding this report	Title	Address (Number and Street)	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
City and State	Zip Code	Email Address	Telephone No. (including Area code and Extension)
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

All reports and information obtained from individual reports will be kept confidential as required by Section 799(e) of Title VII.
WILLFULLY FALSE STATEMENTS ON THIS REPORT ARE PUNISHABLE BY LAW, U.S. CODE, TITLE 18, SECTION 1001



PREPARATION STEPS

If you haven't already...



- ✓ Assess existing HRIS and payroll systems to ensure that they can generate the necessary reports.
- ✓ Be certain in-house payroll systems or 3rd party payroll services can integrate W-2 earnings data with HRIS data
- ✓ Make sure payroll can segregate out and report hours worked from hours paid for non-exempt employees

If you haven't already...



- ✓ Meet with outside payroll vendors to make sure they understand the new requirements.
- ✓ Identify or develop policies that explain how employees earn overtime, bonuses, commissions and other components of W-2 Box 1 wages.
- ✓ Put systems in place to readily retrieve data regarding benefits choices employees make, because these choices can significantly affect W-2 income.

If you haven't already...



- ✓ Identify job titles in each of the 10 EEO-1 job categories and analyze job descriptions to ensure they are accurate and will support pay decisions that reflect different job responsibilities.
- ✓ Identify any existing pay bands that your company uses and map them to the new pay bands on the EEO-1 form.
- ✓ Determine how to report hours worked for exempt employees.

If you haven't already...



- ✓ Determine whether job titles are accurately classified into correct EEO occupational categories. Job responsibilities expand or contract over time with additional duties, use of technology, qualifications required to successfully perform, etc.



Questions



- HR Benefits
- HR Management
- HR Services

We're proud to offer a full-circle solution to your HR needs. BASIC offers collaboration, flexibility, stability, security, quality service and an experienced staff to meet your integrated HR, FMLA and Payroll needs.

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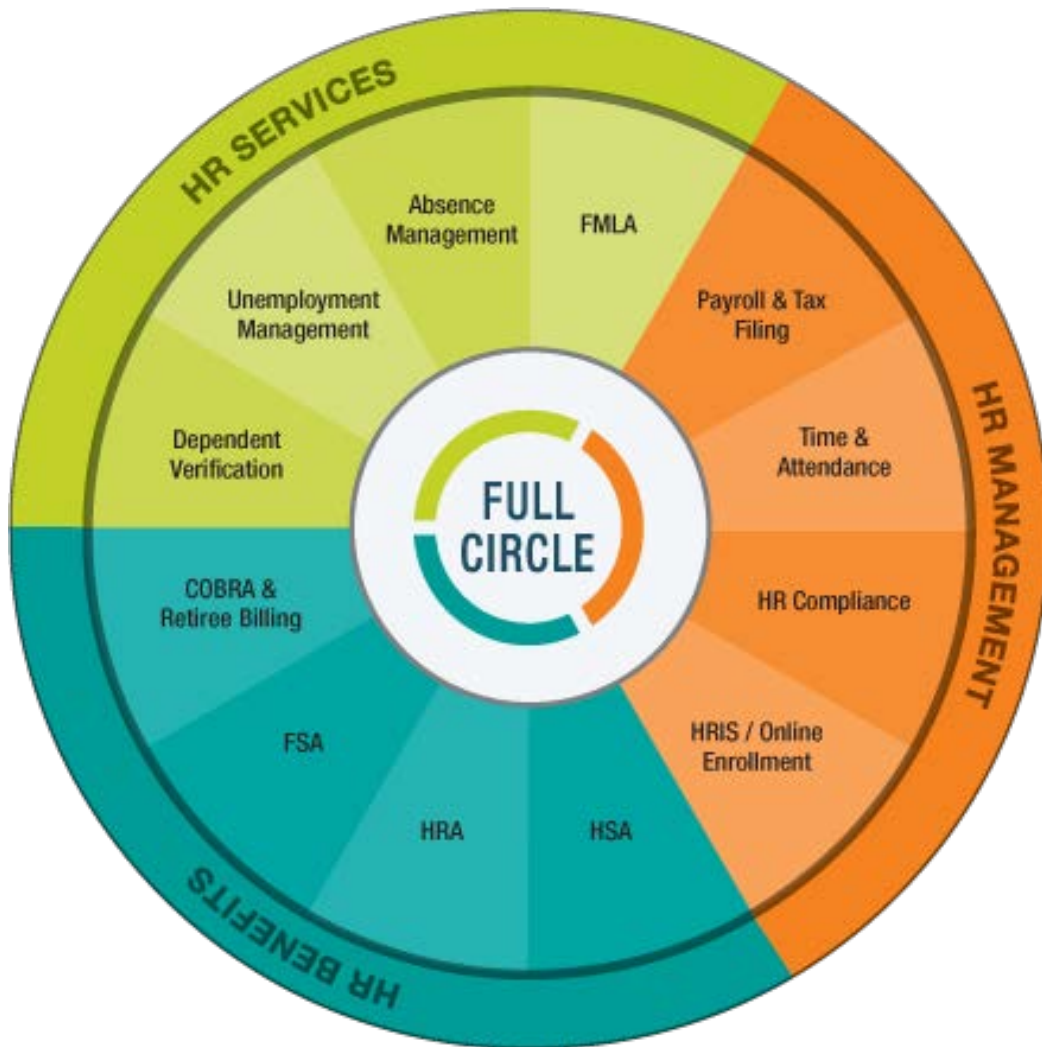
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