

BEYOND THE EEO-1

A Q&A for HR Leaders if the Form Goes Away

HR leaders may receive questions from the C-suite about the need for workforce data collection if federal EEO reporting goes away.

Beyond a reporting requirement, workforce data can help organizations understand what is happening across their workforce, identify trends, ensure compliance, and make better-informed decisions. Know why you need the information, what question it can help answer, and how it will be responsibly used.

Q: If we don't have to file the EEO-1, why are we still collecting this data?

A: **Because we use data for more than a federal form.**

Data can help us understand what's happening across our workforce; evaluate hiring, promotion, compensation, and other practices; and spot trends that may deserve a closer look.

Like financial or operational information, we don't collect data just because someone asks us to report it. We collect it because it helps us understand how the organization is working so that we can make better decisions.

Q: Should we just keep doing what we've always done and collect the same data as before?

A: **No. We should collect data with a purpose.**

We should be able to answer some basic questions: Why do we need this information? What are we trying to understand? Is this the right data to answer that question? Who needs access to it? How are we going to use and protect it?

More data isn't necessarily better data. The goal is having the right information for a legitimate business or compliance purpose.

Q: If the federal reporting requirement goes away, doesn't the compliance reason go away too?

A: **No. The EEO-1 is only part of the picture.**

Our obligations under Title VII don't disappear with a reporting form. Depending on where we operate, state or local rules may still require certain information to be collected or maintained. Additionally, the U.S. Equal Employment Opportunity Commission (EEOC) can still request relevant workforce information as part of an investigation.

The end of routine reporting would change when and how some information is provided to the federal government — it would not necessarily make that information irrelevant.

Q: But couldn't collecting this information create risk for us?

A: **Any important business information needs to be managed responsibly, but knowing less about our workforce isn't a risk-management strategy.**

The right data can help us identify a potential issue early, understand what's driving an outcome, and evaluate whether our employment practices are working as intended.

The focus should be on collecting the information we need, protecting it appropriately, and using it for a clear purpose.

Q: What are we actually supposed to do with the data — and if we see a demographic difference, does that mean we need to change it?

A: **Use the data to ask better questions, not to predetermine an answer.**

A difference may warrant a closer look at recruiting, hiring, promotion, compensation, or retention practices, but the numbers alone don't explain why an outcome exists. Understanding what they mean may require looking at comparable jobs, relevant labor markets, job requirements, skills, qualifications, experience, and other legitimate factors.

The goal is to make sure our systems and practices are working as intended — not to balance the workforce or make employment decisions based on protected characteristics.

THE BOTTOM LINE

Move from reporting-driven to purpose-driven data collection.

