



U.S. Equal Employment Opportunity Commission

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2022 EEO-1 Component 1

Additional FAQs – Volume 2



EEO-1 Component 1
Data Collection



2022 EEO-1 Component 1 Data Collection

Additional FAQs – Volume 2

(Issued October 31, 2023)

FREQUENTLY ASKED QUESTIONS

NOTICE

Employers (i.e., filers) should read the newly updated [2022 EEO-1 Component 1 Instruction Booklet](#) prior to and in conjunction with using the below “FAQs” (i.e., Frequently Asked Questions). Filers must ensure they are complying with the EEOC’s substantive filing requirements detailed in the Instruction Booklet and should not refer solely to these “FAQs” to complete their required 2022 EEO-1 Component 1 filing.

The 2022 EEO-1 Component 1 Instruction Booklet may be accessed at the following link on the EEOC’s dedicated EEO-1 Component 1 website (www.eeocdata.org/eeo1): [https://www.eeocdata.org/pdfs/2022 EEO 1 Component 1 Instruction Booklet.pdf](https://www.eeocdata.org/pdfs/2022%20EEO%201%20Component%201%20Instruction%20Booklet.pdf).

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SAMPLE



A. EEO-1 Component 1 Online Filing System (OFS)

1. *What is the definition of the acronym “OFS?”*

The EEOC collects EEO-1 Component 1 reports (i.e., data) electronically through a web-based data collection application (i.e., portal) referred to as the *EEO-1 Component 1 Online Filing System (OFS)*. EEO-1 Component 1 filers may access the *EEO-1 Component 1 Online Filing System (OFS)* through the EEOC’s dedicated EEO-1 Component 1 website at www.eeocdata.org/eeo1. Employers must submit their data electronically to the *EEO-1 Component 1 Online Filing System (OFS)* through either manual data entry or the upload of a data file.

B. OFS User’s Guide

2. *Will screenshots of the OFS portal (i.e., User’s Guide) be made available to filers for the 2022 EEO-1 Component 1 data collection?*

Yes. The 2022 EEO-1 Component 1 User’s Guide will be available on the dedicated EEO-1 Component 1 website at www.eeocdata.org/eeo1 when data collection opens on Tuesday, October 31, 2023.

C. OFS Company ID

3. *Are we replacing “Company Number” with the “OFS Company ID?” If so, who is providing the “OFS Company ID?” Is it autogenerated in the OFS or do we have to create the OFS Company ID” on our end (i.e., the filer)?*

The “OFS Company ID” is the same as “Company ID” or “Company Number.” It is the unique, alphanumeric, seven-character identifier that corresponds to an employer in the *EEO-1 Component 1 Online Filing System (OFS)*.

4. *The length of the “Company Number” is currently seven characters? What is the length of the “OFS Company ID?” If the “Company ID” is the “Establishment/Unit ID,” it will be more than the seven-character limit. Is there a character limit as provided in the prior collection’s data file upload specifications?*

The “OFS Company ID” is the same as “Company ID” or “Company Number.” It is the unique, alphanumeric, seven-character identifier that corresponds to an employer in the *EEO-1 Component 1 Online Filing System (OFS)*. The Establishment-Level Unit ID is also seven characters. Filers who previously used the now-discontinued “Type 6” Establishment List Report may have had an 11-character or 12-character ID for those establishments. As of the 2022 data collection, all Establishment-Level Unit IDs have been converted to seven-character identifiers. All employers that are affected by this conversion will receive an email notification the week of October 31, 2023, with the new Establishment-Level Unit IDs.



D. Getting Started: OFS Log In – Username and Password

5. ***What if an employer has forgotten their username or password? Or what if the previous point of contact (POC) is no longer with the company, and the employer does not have access to the username and password that was previously used?***

Returning OFS account holders who created their account during or after the 2019/2020 data collection cycle, can sign in using their existing username (i.e., email address) and password. Account holders may sign in to the *EEO-1 Component 1 Online Filing System (OFS)* by visiting www.eeocdata.org/eeo1/signin and entering the email address and password created beginning with the 2019/2020 EEO-1 Component 1 data collection cycle. Account holders who do not know their password should select “Forgot Password.”

6. ***What if most of the employer’s workforce is virtual and may not receive the postal letter with the user ID information?***

The “OFS Company ID” and “Employer PIN” are provided in the employer’s annual filing notification sent via U.S. postal mail to the primary employer contact. This information will also be sent via email to all employer contacts the week of October 31, 2023. To ensure you receive these important notifications, please add Notification@eeocdata.org and EEOCdata-noreply@eeocdata.org to your employer’s safe senders list.

E. Employer Pins

7. ***When will Employer PINs be sent out?***

The “OFS Company ID” and “Employer PIN” are provided in the employer’s annual filing notification sent via U.S. postal mail to the primary employer contact. This information will also be sent via email to all employer contacts the week of October 31, 2023. To ensure you receive these important notifications, please add Notification@eeocdata.org and EEOCdata-noreply@eeocdata.org to your employer’s safe senders list.

F. Reporting of Employees during the Workforce Snapshot Period

8. ***Please clarify whether terminated employees are to be included in an employer’s EEO-1 Component 1 report(s)?***

Workforce demographic data (i.e., employee data by job category and sex and race or ethnicity) must include all full-time and part-time employees who were employed during an employer-selected pay period (i.e., workforce snapshot period) in the fourth quarter (i.e., October 1 through December 31) of the reporting year. The workforce snapshot period for the 2022 EEO-1 Component 1 report would be an employer-selected pay period between October 1, 2022 and December 31, 2022. If an employee was employed during the selected workforce snapshot period, then the employer must include the employee in its reporting even if the employee resigned or was terminated during or after the selected workforce snapshot period. If the employee was employed at any time during the selected workforce snapshot period, then the employee must be reported. An employer is not required to report employees who were not employed at any time during the selected workforce snapshot period.



G. Reporting of Remote Employees

9. *We have remote employees on the West Coast, but the corporate headquarters is on the East Coast. Are the remote employees on the West Coast still counted as part of the corporate headquarters on the East Coast?*

Employees who work remotely and/or telework must be included in an employer's EEO-1 Component 1 report(s) by the specific establishment to which the employees report. If the remote employees on the West Coast report to the corporate headquarters on the East Coast, then those employees should be included on the corporation's "Headquarters Report." Please note that **under no circumstances, should an employee's home address be reported on any EEO-1 Component 1 submission or report.**

H. Reporting of Multiple Establishments

10. *Are bank branches considered separate establishments?*

The EEOC uses the term "establishment" when referring to the filing obligations of eligible employers. An establishment is generally a single physical location where business is conducted or where services or industrial operations are performed (e.g., factory, mill, store, hotel, movie theater, mine, farm, airline terminal, sales office, warehouse, or central administrative office).¹ The EEOC defines a multi-establishment employer as an employer with more than one establishment where business is conducted or where services or industrial operations are performed. A multi-establishment employer is also referred to as a multi-establishment filer for purposes of the EEO-1 Component 1 data collection. A multi-establishment employer is required to submit and certify all the following three types of EEO-1 Component 1 reports to the EEOC: "Consolidated Report"; "Headquarters Report"; "Establishment-Level Report(s)". Establishments at different physical locations must be reported as **separate** establishments even if conducting the same business or performing the same services or industrial operations. However, if establishments are located at the same address (including, for example, suite number) and have both the same NAICS code and the same EIN, the establishments must be combined into a single "Establishment-Level Report." Such establishments are considered one establishment for purposes of EEO-1 Component 1 reporting.

In the FAQ posed above, if the bank "branches" (i.e., establishments) are located at separate physical locations, then such branches are considered separate establishments for purposes of EEO-1 Component 1 reporting. For example, if a banking corporation (i.e., parent) has 10 separate bank branches (i.e., establishments) located in 10 separate locations (not including its corporate headquarters), the corporation would file the following reports: a "Consolidated Report"; a "Headquarters Report" and 10 "Establishment-Level Reports" (i.e., one "Establishment-Level Report" for each of its 10 "branches" or locations.)

11. *Our company has different subsidiaries with different federal tax ID numbers (i.e., EINs) at multiple locations. Do we run a separate report for every business within each address? For*

¹ See Frequently Asked Question 2 (What is an establishment?) at <https://www.census.gov/naics/> for the U.S. Census Bureau's North American Industry Classification System (NAICS) definition.



example, if three companies sit at the same address, would we submit three reports? Or only one report for each physical address?

The EEOC uses the term “establishment” when referring to the filing obligations of eligible employers. An establishment is generally a single physical location where business is conducted or where services or industrial operations are performed (e.g., factory, mill, store, hotel, movie theater, mine, farm, airline terminal, sales office, warehouse, or central administrative office).² The EEOC defines a multi-establishment employer as an employer with more than one establishment where business is conducted or where services or industrial operations are performed. A multi-establishment employer is also referred to as a multi-establishment filer for purposes of the EEO-1 Component 1 data collection. A multi-establishment employer is required to submit and certify all the following three types of EEO-1 Component 1 reports to the EEOC: “Consolidated Report”; “Headquarters Report”; “Establishment-Level Report(s)”.

Establishments at different physical locations must be reported as **separate** establishments even if conducting the same business or performing the same services or industrial operations. However, if establishments are located at the same address (including, for example, suite number) and have both the same NAICS code and the same EIN, the establishments must be combined into a single “Establishment-Level Report.” Such establishments are considered one establishment for purposes of EEO-1 Component 1 reporting.

In the FAQ posed above, the company with different subsidiaries with different EINs at multiple locations, would be required to provide an individual “Establishment-Level Report” for each one of these subsidiaries. Additionally, even if the three subsidiaries are located at the same address, a separate “Establishment-Level Report” would be required for each subsidiary (i.e., three “Establishment-Level Reports”).

12. *We have five remote contractors working in a foreign country outside of the United States. Would that make us a multi-establishment employer?*

For purposes of EEO-1 Component 1 reporting, employers should only include establishments located in the 50 United States and the District of Columbia. Employers should not include establishments located in Puerto Rico, the Virgin Islands, or other American protectorates.

The EEOC uses the term “establishment” when referring to the filing obligations of eligible employers. An establishment is generally a single physical location where business is conducted or where services or industrial operations are performed (e.g., factory, mill, store, hotel, movie theater, mine, farm, airline terminal, sales office, warehouse, or central administrative office). 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. A single-establishment employer is also referred to as a single-establishment filer for purposes of the EEO-1 Component 1 data collection. A single-establishment employer is required to submit and certify only one EEO-1 Component 1 report (i.e., a “Single-Establishment Employer Report”).

The EEOC defines a multi-establishment employer as an employer with more than one

² See Frequently Asked Question 2 (What is an establishment?) at <https://www.census.gov/naics/> for the U.S. Census Bureau’s North American Industry Classification System (NAICS) definition.



establishment where business is conducted or where services or industrial operations are performed. A multi-establishment employer is also referred to as a multi-establishment filer for purposes of the EEO-1 Component 1 data collection. A multi-establishment employer is required to submit and certify all the following three types of EEO-1 Component 1 reports to the EEOC: “Consolidated Report”; “Headquarters Report”; “Establishment-Level Report(s)”.

In the FAQ posed above, if the employer has only one establishment in the United States, the employer would be considered a single-establishment employer for purposes of the EEO-1 Component 1.

Please Note: If in the above FAQ, the company is a foreign-based company (i.e., outside of the United States) but has locations within the United States, the foreign-based company is required to file an EEO-1 Component 1 report(s) for those locations within the United States. Foreign-based and/or foreign-owned employers **must** report for eligible establishments located in the 50 United States and the District of Columbia. If a foreign-based and/or foreign-owned employer has a United States-based headquarters, the U.S. based headquarters is responsible for filing as a multi-establishment filer (i.e., multi-establishment employer) for all the employer’s establishments located in the 50 United States and the District of Columbia. If a foreign-based and/or foreign-owned employer does **not** have a headquarters based in the 50 United States or the District of Columbia, one of its establishments located in the U.S. *may* file on behalf of all the employer’s establishments as a multi-establishment filer (i.e., multi-establishment employer) but is not required to do so. Otherwise, each establishment must file its own EEO-1 Component 1 report with the EEOC.

I. *Reporting an Acquisition, Spinoff, or Merger*

13. *Have there been any changes to the “Report Acquisition, Spinoff, or Merger” module?*

The only change to the “Report Acquisition, Spinoff, of Merger” module in the *2022 EEO-1 Component 1 Online Filing System* (OFS) is the collection of when (i.e., which year) the acquisition, spinoff, or merger (i.e., ASM) occurred. For important details and information on Acquisitions, Spinoffs, and Mergers, please refer to the [ASM Fact Sheet](#) on the dedicated EEO-1 Component 1 website at www.eeocdata.org/eeo1.

14. *If a company has closed, how should the EEOC be notified? Is there a separate notification, in addition to the Acquisition, Spinoff, or Merger module?*

If an employer has experienced an acquisition, spinoff, or merger (i.e., ASM) since the last EEO-1 Component 1 reporting cycle, the employer must utilize the “Report Acquisition, Spinoff, or Merger” module in the *EEO-1 Component 1 Online Filing System* (OFS) to report any changes to the EEOC. The module will provide filers detailed information on how to accurately report such changes within the OFS. For important details and information on Acquisitions, Spinoffs, and Mergers, please refer to the [ASM Fact Sheet](#) on the dedicated EEO-1 Component 1 website at www.eeocdata.org/eeo1.

An employer that receives an EEO-1 Component 1 filing notice from the EEOC but has ceased operations and is no longer in business must access the *EEO-1 Component 1 Online Filing System* (OFS) to complete the embedded eligibility screener. If the eligibility screener indicates the employer is ineligible to file, the employer must certify that its company is ineligible and no longer in



business in the OFS. Failure to certify ineligibility through the OFS will result in future EEO-1 Component 1 filing notices being sent to the employer by the EEOC.

15. *If an employer acquired a company on December 31, 2022, must the employer choose the pay period (i.e., workforce snapshot period) ending December 31, 2022, to capture the acquisition? Or, if the employer normally selects a workforce snapshot period in October, can the employer still choose a workforce snapshot period in October that excludes the employees acquired on December 31, 2022?*

If a company/employer acquired another company/employer, certain filing obligations apply depending on when the acquisition was completed.

Acquisition Completed before or during the Fourth Quarter (i.e., October 1 through December 31) of the Reporting Year (i.e., 2022): If the acquisition was completed *before* or *during* the fourth quarter (i.e., October 1 through December 31) of the reporting year (i.e., 2022) and the acquiring company otherwise meets the filing eligibility requirements, the acquiring company is responsible for submitting 2022 EEO-1 Component 1 data for itself and the newly acquired company.

Acquisition Completed after the Fourth Quarter (i.e., October 1 through December 31) of the Reporting Year (i.e., 2022): If the acquisition was completed *after* the fourth quarter (i.e., October 1 through December 31) of the reporting year (i.e., 2022) and the acquiring company otherwise meets the filing eligibility requirements and has access to 2022 EEO-1 Component 1 data for a workforce snapshot period from the fourth quarter of the reporting year for the acquired company, the acquiring company is responsible for submitting 2022 EEO-1 Component 1 data for itself and the newly acquired company. If the acquiring company is eligible to file and does not have access to 2022 EEO-1 Component 1 data for a workforce snapshot period from the fourth quarter of the reporting year for the acquired company, the acquiring company should note this in the “Certification Comments” within the OFS.

16. *Are the instructions regarding mergers only applicable to mergers that occurred in calendar year 2022?*

No. If a company/employer merged with another company/employer to create a new company/employer, certain filing obligations apply depending on when the merger was completed.

Merger Completed before or during the Fourth Quarter (i.e., October 1 through December 31) of the Reporting Year (i.e., 2022): If the merger was completed *before* or *during* the fourth quarter (i.e., October 1 through December 31) of the reporting year (i.e., 2022) and the new company otherwise meets the filing eligibility requirements, the new company is responsible for submitting 2022 EEO-1 Component 1 data under a new “OFS Company ID” provided by the EEOC through the *EEO-1 Component 1 Online Filing System (OFS)*.

Merger Completed after the Fourth Quarter (i.e., October 1 through December 31) of the Reporting Year (i.e., 2022): If the merger was completed *after* the fourth quarter (i.e., October 1 through December 31) of the reporting year (i.e., 2022) and the new company otherwise meets the filing eligibility requirements and has access to 2022 EEO-1 Component 1 data for a workforce snapshot period from the fourth quarter of the reporting year for one or more of the companies



that merged, the new company is responsible for submitting 2022 EEO-1 Component 1 data under a new “OFS Company ID” provided by the EEOC through the *EEO-1 Component 1 Online Filing System* (OFS). If the newly created company is eligible to file and does not have access to 2022 EEO-1 Component 1 data for a workforce snapshot period from the fourth quarter of the reporting year for one or more of the companies that merged, the newly created company should note this in the “Certification Comments” within the OFS.

J. Consolidated Reports for Multi-Establishment Employers

17. *Will a multi-establishment filer be able to make changes to the employee numbers in the “Consolidated Report” given the “Consolidated Report” will be auto-populated and auto-generated with data from the “Headquarters Report” and each “Establishment-Level Report” within the EEO-1 Component 1 Online Filing System (OFS)?*

All individual “Consolidated Reports” for multi-establishment employers will be auto-populated and auto-generated with data from their “Headquarters Report” and each “Establishment-Level Report” within the OFS. In the FAQ posed above, a multi-establishment filer will **not** be able to make changes directly to the “Consolidated Report.” However, a filer can edit an individual “Headquarters Report” and/or “Establishment-Level Report(s)” to ensure the auto-populated and auto-generated “Consolidated Report” reflects accurate totals for an employer across the headquarters and all non-headquarters establishments.

K. Updating and/or Changing Data in OFS

18. *Is a filer able to make updates to its 2022 submission in the OFS if such updates are made by the December 5, 2023 published deadline? Additionally, will updates to 2022 data be permitted in the OFS if done after the December 5, 2023 published deadline but before the January 9, 2024 “failure to file” deadline?*

Yes. Following the **Tuesday, December 5, 2023** “Published Due Date” deadline, the EEOC will enter the “Failure to File” phase. All employers who have not submitted and certified their mandatory 2022 EEO-1 Component 1 report(s) by the **Tuesday, December 5, 2023** “Published Due Date” deadline will receive a “Notice of Failure to File” from the EEOC instructing them to submit and certify their data as soon as possible, and no later than **Tuesday, January 9, 2024** (i.e., “Failure to File” deadline). After the **Tuesday, January 9, 2024** “Failure to File” deadline passes, no additional 2022 EEO-1 Component 1 report(s) will be accepted, and eligible employers will be out of compliance with their mandatory 2022 EEO-1 Component 1 filing obligations.

In the FAQ posed above, a filer is permitted to make updates to its 2022 EEO-1 Component 1 report(s) until **Tuesday, January 9, 2024**, but *must* certify its 2022 EEO-1 Component 1 report(s) on or before this date.

L. Reporting by Race or Ethnicity

19. *My company has employees who have chosen not to self-identify. How does my company report such employees in the EEO-1 Component 1 report?*

If an employee declines to self-identify their race and/or ethnicity, employment records or observer



identification may be used. Where records are maintained, they should be kept separately from the employee's basic personnel file or other records available to those responsible for personnel decisions.

M. Voluntary Reporting of Non-Binary Employees

20. *Is there an option for employers to report non-binary employees on the 2022 EEO-1 Component report?*

Yes. As discussed in the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled "REPORTING BY SEX," the EEO-1 Component 1 data collection currently provides only binary options (i.e., male or female) for reporting employee counts by sex, job category, and race or ethnicity. However, employers may *voluntarily* choose to report employee demographic data for non-binary employees – that is, employees who do not identify as exclusively male or female – by sex (i.e., non-binary), job category and race or ethnicity in the "comments" section of the report(s). Employers that voluntarily choose to report non-binary employees in the "comments" section of the report(s) should not assign such employees to the male or female categories or any other categories (i.e., job category and race or ethnicity) within the report(s). For additional information on the voluntary reporting of non-binary employees, please refer to the section of the Instruction Booklet entitled "REPORTING BY SEX."

21. *If an employer has 150 employees and two are non-binary, the instructions state that it is voluntary (i.e., the employer's option) to report the employees as non-binary in the comments section. If the employer chooses not to include the two non-binary employees in the 150-employee count given that the employees do not identify as either male or female, is the employer required to report the two non-binary employees in the comments section?*

No. As discussed in the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled "REPORTING BY SEX," employers may *voluntarily* choose to report employee demographic data for non-binary employees – that is, employees who do not identify as exclusively male or female – by sex (i.e., non-binary), job category and race or ethnicity in the "comments" section of the report(s). Employers that choose **not** to report non-binary employees in the "comments" section of the report(s) are not required to assign such employees to the male or female categories or any other categories (i.e., job category and race or ethnicity) within the report(s). Please note, however, that an employer's decision about voluntary reporting of non-binary employees does not impact the employee threshold for EEO-1 Component 1 reporting purposes. For example, if a non-federal contractor employer has a total of 100 employees, of which 2 are non-binary and not reported in the "comments" section, the employer is still required to file even though the total number of employees on the employer's "Single-Establishment Employer Report" would reflect only 98 employees. For additional information on the voluntary reporting of non-binary employees, please refer to the section of the Instruction Booklet entitled "REPORTING BY SEX."

N. Reporting by International Companies

22. *If we are a global company, do we report data for only our US-based employees?*

Yes. If a company has locations outside of the United States (e.g., Asia, Europe), the company is not required to report those international locations on the EEO-1 Component 1 report. Employers



should only include establishments located in the 50 United States and the District of Columbia. Employers should not include establishments located in Puerto Rico, the Virgin Islands, or other American protectorates.

Additionally, if a company is a foreign-based company (i.e., outside of the United States) but has locations within the United States, the foreign-based company is required to file EEO-1 Component 1 report(s) for those locations within the United States. Foreign-based and/or foreign-owned employers **must** report for eligible establishments located in the 50 United States and the District of Columbia. If a foreign-based and/or foreign-owned employer has a United States-based headquarters, the U.S. based headquarters is responsible for filing as a multi-establishment filer (i.e., multi-establishment employer) for all the employer’s establishments located in the 50 United States and the District of Columbia. If a foreign-based and/or foreign-owned employer does **not** have a headquarters based in the 50 United States or the District of Columbia, one of its establishments located in the U.S. may file on behalf of all the employer’s establishments as a multi-establishment filer (i.e., multi-establishment employer) but is not required to do so. Otherwise, each establishment must file its own EEO-1 Component 1 report with the EEOC.

O. How to Report a Unique Entity ID (UEI) for Federal Contractors

23. What is a Unique Entity ID (UEI)? Where can a filer get a UEI?

On April 4, 2022, the federal government stopped using the “Data Universal Numbering System” (DUNS) to uniquely identify entities doing business with the federal government (i.e., federal contractors). Before April 4, 2022, the DUNS Number issued by Dun & Bradstreet was the official entity identifier used by the federal government. The “Unique Entity ID” (UEI) created in SAM.gov (i.e., www.sam.gov) is now the official identifier for federal contractors.³ For purposes of the EEO-1 Component 1 data collection, eligible federal contractors will no longer provide the “DUNS Numbers” associated with their headquarters and/or establishment(s) in the *EEO-1 Component 1 Online Filing System* (OFS) or in any data files uploaded to the OFS. Beginning with the 2022 EEO-1 Component 1 data collection, employers (i.e., single-establishment and multi-establishment employers) that are federal contractors must instead provide UEIs. For example, a multi-establishment employer must provide UEIs for any headquarters and/or establishment(s) which are federal contractors.⁴

24. What if my company has an establishment that is a federal contractor, but the establishment doesn’t have a UEI? May my company use, for example, the enterprise, parent, or headquarters UEI for the establishment’s UEI field?

Yes. If your company has an establishment that is a federal contractor, but your company does not have a separate UEI for that establishment, you may use the company’s non-headquarters establishment UEI (e.g., enterprise, parent, or headquarters level UEI) if your company has one for

³ For more information on the federal government’s transition to the Unique Entity ID (i.e., UEI), see <https://www.gsa.gov/about-us/organization/federal-acquisition-service/technology-transformation-services/integrated-award-environment-iae/iae-systems-information-kit/unique-entity-identifier-update>; https://www.fsd.gov/gsafsd_sp?id=kb_article_view&sysparm_article=KB0041254&sys_kb_id=875189f21bee8d54937fa64ce54bcbbaa&spa=1 and <https://sam.gov/content/duns-uei>.

⁴ Please refer to the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled “WHO MUST FILE” for federal contractor eligibility.



the establishment's UEI field. Alternatively, if your company has an establishment that is a federal contractor, but your company does not have a separate UEI for that establishment, or your company is unsure which UEI to use for the establishment, your company may enter the word "UNAVAILABLE" (without quotation marks) in the UEI field in place of a UEI. If a company indicates an establishment is a federal contractor, the UEI field cannot be left blank.

- 25. *If only one non-headquarters establishment has a federal contract, but the UEI is for the corporate headquarters in www.sam.gov, do we only provide the UEI for the headquarters and leave the other establishments blank? Or do we use the same UEI for all establishments?***

If your company has an establishment that is a federal contractor, but your company does not have a separate UEI for that establishment, you may use the company's non-headquarters establishment UEI (e.g., enterprise, parent, or headquarters level UEI) if your company has one for the establishment's UEI field. Alternatively, if your company has an establishment that is a federal contractor, but your company does not have a separate UEI for that establishment, or your company is unsure which UEI to use for the establishment, your company may enter the word "UNAVAILABLE" (without quotation marks) in the UEI field in place of a UEI. If a company indicates an establishment is a federal contractor, the UEI field cannot be left blank.

Also, please note that providing a UEI for the 2022 EEO-1 Component 1 report is only applicable to employers that are federal contractors. If your company is not a federal contractor, nor are any of its establishments, then your company is not required to provide a UEI(s). If only *some* of your company's establishments are federal contractors (e.g., one non-headquarters establishment), then a UEI only needs to be provided for those establishments which are federal contractors. For example, if your company has 20 non-headquarters establishments and 10 of those non-headquarters establishments are federal contractors, then a UEI needs to be provided for each of those 10 non-headquarters establishments and each of those non-headquarters establishments may have a different UEI. UEIs do not need to be provided for establishments which are not federal contractors.

- 26. *For the 2022 EEO-1 Component 1 data collection, federal contractors are now required to provide a UEI instead of a DUNS. The DUNS was a companywide number, but there are multiple UEIs in www.sam.gov for my company, all with different addresses. For a company that has multiple establishments, can the UEI differ by location (i.e., establishment)?***

Yes. For purposes of the EEO-1 Component 1 data collection, eligible federal contractors will no longer provide the "DUNS Numbers" associated with their headquarters and/or establishment(s) in the *EEO-1 Component 1 Online Filing System* (OFS) or in any data files uploaded to the OFS. The "Unique Entity ID" (UEI) created in SAM.gov (i.e., www.sam.gov) is the U.S. Government's official identifier for federal contractors (i.e., entities doing business with the federal government). Beginning with the 2022 EEO-1 Component 1 data collection, employers (i.e., single-establishment and multi-establishment employers) that are federal contractors must instead provide UEIs. For example, a multi-establishment employer must provide UEIs for any headquarters and/or



establishment(s) which are federal contractors.⁵

Providing a UEI for the 2022 EEO-1 Component 1 report is only applicable to employers that are federal contractors. If your company is not a federal contractor, nor are any of its establishments, then your company is not required to provide a UEI(s). If only *some* of your company's establishments are federal contractors, then a UEI only needs to be provided for those establishments which are federal contractors. For example, if your company has 20 non-headquarters establishments and 10 of those non-headquarters establishments are federal contractors, then a UEI needs to be provided for each of those 10 non-headquarters establishments and each of those non-headquarters establishments may have a different UEI.

27. Are UEIs specific to a location (i.e., establishment)?

Yes. Beginning with the 2022 EEO-1 Component 1 data collection, employers (i.e., single-establishment and multi-establishment employers) that are federal contractors must provide UEIs. The "Unique Entity ID" (UEI) created in SAM.gov (i.e., www.sam.gov) is the U.S. Government's official identifier for federal contractors (i.e., entities doing business with the federal government). For example, a multi-establishment employer must provide UEIs for any headquarters and/or establishment(s) which are federal contractors.⁶

Providing a UEI for the 2022 EEO-1 Component 1 report is only applicable to employers that are federal contractors. If your company is not a federal contractor, nor are any of its establishments, then your company is not required to provide a UEI(s). If only *some* of your company's establishments are federal contractors, then a UEI only needs to be provided for those establishments which are federal contractors. For example, if your company has 20 non-headquarters establishments and 10 of those non-headquarters establishments are federal contractors, then a UEI needs to be provided for each of those 10 non-headquarters establishments and each of those non-headquarters establishments may have a different UEI.

If a company indicates it is a federal contractor and/or has an establishment that is a federal contractor, the UEI field cannot be left blank. If your company is a federal contractor and/or has an establishment that is a federal contractor, but you do not have a UEI for your company and/or establishment(s), or your company is unsure which UEI to use, your company may enter the word "UNAVAILABLE" (without quotation marks) in the UEI field in place of a UEI. Alternatively, if your company is unsure which UEI to use for an establishment(s) that is a federal contractor, you may use the company's non-headquarters establishment UEI (e.g., enterprise, parent, or headquarters level UEI) if your company has one for the establishment's UEI field.

28. Will a federal contractor be able to file a 2022 EEO-1 Component 1 report without providing a UEI?

Beginning with the 2022 EEO-1 Component 1 data collection, employers (i.e., single-establishment and multi-establishment employers) that are federal contractors must provide UEIs. The "Unique Entity ID" (UEI) created in SAM.gov (i.e., www.sam.gov) is the U.S. Government's official identifier

⁵ Please refer to the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled "WHO MUST FILE" for federal contractor eligibility.

⁶ Please refer to the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled "WHO MUST FILE" for federal contractor eligibility.



for federal contractors (i.e., entities doing business with the federal government). For example, a multi-establishment employer must provide UEIs for any headquarters and/or establishment(s) which are federal contractors.⁷ Eligible federal contractors will no longer provide the “DUNS Numbers” associated with their headquarters and/or establishment(s) in the *EEO-1 Component 1 Online Filing System* (OFS) or in any data files uploaded to the OFS.

If a company indicates it is a federal contractor and/or has an establishment that is a federal contractor, the UEI field cannot be left blank. If your company is a federal contractor and/or has an establishment that is a federal contractor, but you do not have a UEI for your company and/or establishment(s), or your company is unsure which UEI to use, your company may enter the word “UNAVAILABLE” (without quotation marks) in the UEI field in place of a UEI. Alternatively, if your company is unsure which UEI to use for an establishment(s) that is a federal contractor, you may use the company’s non-headquarters establishment UEI (e.g., enterprise, parent, or headquarters level UEI) if your company has one for the establishment’s UEI field.

29. *Not all our establishments have a UEI since not all our establishments have business with the government (i.e., are not a federal contractor). Will we be permitted to leave the UEI field “blank” for our establishments that are not federal contractors?*

Yes. Providing a UEI for the 2022 EEO-1 Component 1 report is only applicable to employers and establishments that are federal contractors. If your company is not a federal contractor, nor are any of its establishments, then your company is not required to provide a UEI(s). If only *some* of your company’s establishments are federal contractors, then a UEI only needs to be provided for those establishments which are federal contractors. For example, if your company has 20 non-headquarters establishments and 10 of those non-headquarters establishments are federal contractors, then a UEI needs to be provided for each of those 10 non-headquarters establishments.

30. *What if my company has an establishment that is a federal contractor, but the establishment doesn’t have a UEI? Can I leave the UEI field blank for that establishment?*

No. If a company indicates an establishment is a federal contractor, the UEI field cannot be left blank. If your company has an establishment that is a federal contractor, but your company does not have a separate UEI for that establishment, or your company is unsure which UEI to use for the establishment, your company may enter the word “UNAVAILABLE” (without quotation marks) in the UEI field in place of a UEI. Alternatively, if your company is unsure which UEI to use for an establishment(s) that is a federal contractor, you may use the company’s non-headquarters establishment UEI (e.g., enterprise, parent, or headquarters level UEI) if your company has one for the establishment’s UEI field.

31. *My company is a federal contractor, specifically a longtime federal subcontractor. My company, as a federal subcontractor, does not have a UEI and was never asked to register for a UEI with www.sam.gov. What information should my company provide in the UEI field for purposes of the EEO-1 Component 1 report since we don’t have a UEI?*

If your company is a federal contractor and/or has an establishment that is a federal contractor, but

⁷ Please refer to the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled “WHO MUST FILE” for federal contractor eligibility.



you do not have a UEI for your company and/or establishment(s), your company may enter the word “UNAVAILABLE” (without quotation marks) in the UEI field in place of a UEI. If a company indicates it is a federal contractor and/or has an establishment that is a federal contractor, the UEI field cannot be left blank.

32. For purposes of EEO-1 Component 1 reporting, how will banks that are federal contractors provide a UEI(s) given that many banks are not registered in www.sam.gov?

If an employer (e.g., a bank) is a federal contractor and/or has an establishment that is a federal contractor but does not have a UEI for its company and/or establishment(s), the employer may enter the word “UNAVAILABLE” (without quotation marks) in the UEI field in place of a UEI. If an employer (e.g., a bank) indicates it is a federal contractor and/or has an establishment that is a federal contractor, the UEI field cannot be left blank.

33. My company is a federal contractor and has many UEIs depending on when the contract was signed and with what federal agency. Which UEI do I provide for EEO-1 Component 1 reporting purposes.

If your company is a federal contractor and/or has an establishment that is a federal contractor, but your company is unsure which UEI to use for the company and/or establishment(s), your company may enter the word “UNAVAILABLE” (without quotation marks) in the UEI field in place of a UEI. Alternatively, if your company is unsure which UEI to use for an establishment(s) that is a federal contractor, you may use the company’s non-headquarters establishment UEI (e.g., enterprise, parent, or headquarters level UEI) if your company has one for the establishment’s UEI field. If a company indicates it is a federal contractor and/or has an establishment that is a federal contractor, the UEI field cannot be left blank.

34. What if an employer has more than one UEI for an establishment that is a federal contractor? Which UEI does the employer provide for EEO-1 Component 1 reporting purposes?

If the employer has an establishment with multiple UEIs and the employer is unsure which UEI to use for the establishment, the employer may enter the word “UNAVAILABLE” (without quotation marks) in the UEI field in place of a UEI for that establishment. Alternatively, if your company is unsure which UEI to use for an establishment(s) that is a federal contractor, you may use the company’s non-headquarters establishment UEI (e.g., enterprise, parent, or headquarters level UEI) if your company has one for the establishment’s UEI field. If an employer has an establishment that is a federal contractor, the UEI field cannot be left blank.

35. Does a filer now provide a UEI in place of the EIN? Or is a filer required to provide both a UEI and an EIN for the EEO-1 Component 1 report?

For EEO-1 Component 1 reporting, a UEI (i.e., Unique Entity ID) is not provided in place of an EIN (i.e., Employer Identification Number) or vice versa. A UEI and an EIN are two separate and different identifiers provided by the federal government. Additionally, a UEI is only applicable to entities that do business with the federal government (i.e., federal contractors).

EIN: The Employer Identification Number (EIN) is a unique, nine-digit identifier used to identify business entities in the U.S. It is assigned by the IRS and is needed by all businesses that have



employees and certain others with no employees. For purposes of EEO-1 Component 1 reporting, an EIN must be provided for a single-establishment employer and a multi-establishment employer's headquarters and each of its establishments. However, if establishments are located at the same address (including, for example, suite number) and have both the same NAICS code and the same EIN, the establishments must be combined into a single "Establishment-Level Report." Such establishments are considered one establishment for purposes of EEO-1 Component 1 reporting. Please note that if an establishment (e.g., subsidiary) has a different EIN than, for example, its "parent" company, the establishment cannot file its EEO-1 Component 1 report separately from its "parent" company. The "parent" company's headquarters is responsible for filing "Establishment-Level Report(s)" for all its establishments, even if the establishments have different EINs from the "parent" company.⁸

UEI: On April 4, 2022, the federal government stopped using the "Data Universal Numbering System" (DUNS) to uniquely identify entities doing business with the federal government (i.e., federal contractors). Before April 4, 2022, the DUNS Number issued by Dun & Bradstreet was the official entity identifier used by the federal government. The "Unique Entity ID" (UEI) created in SAM.gov (i.e., www.sam.gov) is now the official identifier for federal contractors.⁹ For purposes of the EEO-1 Component 1 data collection, eligible federal contractors will no longer provide the "DUNS Numbers" associated with their headquarters and/or establishment(s) in the *EEO-1 Component 1 Online Filing System* (OFS) or in any data files uploaded to the OFS. Beginning with the 2022 EEO-1 Component 1 data collection, employers (i.e., single-establishment and multi-establishment employers) that are federal contractors must instead provide UEIs. For example, a multi-establishment employer must provide UEIs for any headquarters and/or establishment(s) which are federal contractors.¹⁰

36. *Is there a list of federal contractors and their associated UEIs that would be readily available for employers that are federal contractors?*

The EEOC does not generate UEIs and is not the source for these federal government-generated identifiers. Neither the EEOC nor the EEOC's Filer Support Team *Message Center* (i.e., help desk) can provide federal contractors with their associated UEIs. Employers that are federal contractors should ensure that their EEO-1 Component 1 POCs (i.e., points of contact) and/or EEO-1 Component 1 Certifying Officials have access to the employers' UEIs to complete their 2022 report(s).

As discussed in the 2022 EEO-1 Component 1 Instruction Booklet, on April 4, 2022, the federal government stopped using the "Data Universal Numbering System" (DUNS) to uniquely identify entities doing business with the federal government (i.e., federal contractors). Before April 4, 2022, the DUNS Number issued by Dun & Bradstreet was the official entity identifier used by the federal

⁸ Please note that a "parent" company, holding company, or other such corporate-type entity must file as a multi-establishment employer (i.e., multi-establishment filer) for itself as well as any other commonly owned, controlled, managed, affiliated, or associated establishments (e.g., subsidiaries, holdings).

⁹ For more information on the federal government's transition to the Unique Entity ID (i.e., UEI), see <https://www.gsa.gov/about-us/organization/federal-acquisition-service/technology-transformation-services/integrated-award-environment-iae/iae-systems-information-kit/unique-entity-identifier-update>; https://www.fsd.gov/gsafsd_sp?id=kb_article_view&sysparm_article=KB0041254&sys_kb_id=875189f21bee8d54937fa64ce54bcbbaa&spa=1 and <https://sam.gov/content/duns-uei>.

¹⁰ Please refer to the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled "WHO MUST FILE" for federal contractor eligibility.



government. The “Unique Entity ID” (UEI) created in SAM.gov (i.e., www.sam.gov) is now the official identifier for federal contractors.¹¹ For purposes of the EEO-1 Component 1 data collection, eligible federal contractors will no longer provide the “DUNS Numbers” associated with their headquarters and/or establishment(s) in the *EEO-1 Component 1 Online Filing System* (OFS) or in any data files uploaded to the OFS. Beginning with the 2022 EEO-1 Component 1 data collection, employers (i.e., single-establishment and multi-establishment employers) that are federal contractors must instead provide UEIs. For example, a multi-establishment employer must provide UEIs for any headquarters and/or establishment(s) which are federal contractors.¹²

37. Are federal contractors filing an EEO-1 Component 1 report required to provide a UEI? UEIs may be difficult for “HR” (i.e., Human Resources) staff to obtain as part of the EEO-1 Component 1 filing process since HR staff may not be privy to such information.

Beginning with the 2022 EEO-1 Component 1 data collection, employers (i.e., single-establishment and multi-establishment employers) that are federal contractors must provide UEIs. The “Unique Entity ID” (UEI) created in SAM.gov (i.e., www.sam.gov) is the U.S. Government’s official identifier for federal contractors (i.e., entities doing business with the federal government). For example, a multi-establishment employer must provide UEIs for any headquarters and/or establishment(s) which are federal contractors.¹³ Eligible federal contractors will no longer provide the “DUNS Numbers” associated with their headquarters and/or establishment(s) in the *EEO-1 Component 1 Online Filing System* (OFS) or in any data files uploaded to the OFS.

The EEOC does not generate UEIs and is not the source for these federal government-generated identifiers. Neither the EEOC nor the EEOC’s Filer Support Team *Message Center* (i.e., help desk) can provide federal contractors with their associated UEIs. Employers that are federal contractors should ensure that their EEO-1 Component 1 POCs (i.e., points of contact) and/or EEO-1 Component 1 Certifying Officials have access to the employers’ UEIs to complete their 2022 report(s).

If a company indicates it is a federal contractor and/or has an establishment that is a federal contractor, the UEI field cannot be left blank. However, if your company is a federal contractor and/or has an establishment that is a federal contractor, but you do not have a UEI for your company and/or establishment(s), or your company is unsure which UEI to use, your company may enter the word “UNAVAILABLE” (without quotation marks) in the UEI field in place of a UEI. Alternatively, if your company is unsure which UEI to use for an establishment(s) that is a federal contractor, you may use the company’s non-headquarters establishment UEI (e.g., enterprise, parent, or headquarters level UEI) if your company has one for the establishment’s UEI field.

¹¹ For more information on the federal government’s transition to the Unique Entity ID (i.e., UEI), see <https://www.gsa.gov/about-us/organization/federal-acquisition-service/technology-transformation-services/integrated-award-environment-iae/iae-systems-information-kit/unique-entity-identifier-update>; https://www.fsd.gov/gsafsd_sp?id=kb_article_view&sysparm_article=KB0041254&sys_kb_id=875189f21bee8d54937fa64ce54bcbbaa&spa=1 and <https://sam.gov/content/duns-uei>.

¹² Please refer to the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled “WHO MUST FILE” for federal contractor eligibility.

¹³ Please refer to the section of the [2022 EEO-1 Component 1 Instruction Booklet](#) entitled “WHO MUST FILE” for federal contractor eligibility.



P. Data File Upload Specifications

Reporting of New Establishments (“Type 9 Reports”)

38. Are type 9 reports currently invalid?

As with prior EEO-1 Component 1 data collections, a Status Code of 9 (i.e., Status Code=9) allows multi-establishment employers to submit an “Establishment-Level Report” for a new establishment. Status Code=9 indicates a new “Establishment-Level Report” that has never been reported in prior-year EEO-1 Component 1 reports and has never been assigned an Establishment-Level Unit ID.¹⁴

39. Is it correct that all new reports, regardless of size, will be a “Type 9”?

As with prior EEO-1 Component 1 data collections, a Status Code of 9 (i.e., Status Code=9) allows multi-establishment employers to submit an “Establishment-Level Report” for a new establishment. Status Code=9 indicates a new “Establishment-Level Report” that has never been reported in prior-year EEO-1 Component 1 reports and has never been assigned an Establishment-Level Unit ID.¹⁵

40. Will these reports stay a “Type 9” report going forward? Or in the next reporting cycle will they become an existing location and need to be a “Type 4” or a “Type 8” report?

As with prior EEO-1 Component 1 data collections, “Establishment-Level Reports” for new non-headquarters establishments should be indicated using a Status Code of 9 in the 2022 EEO-1 Component 1 data file. In future data collections, these establishments should be assigned a Status Code representing an existing “Establishment-Level Report” (e.g., Status Code=4 or Status Code=8 in the 2022 EEO-1 Component 1 data collection).

Reporting of Existing Establishments

41. For existing establishments (i.e., reported in the last collection cycle), what happens if an existing establishment had 50 or more employees last year (i.e., a “Type 4”) but this year has less than 50 employees and would otherwise be a “Type 8” establishment? Do we have to keep this establishment as a “Type 4”, or can we submit it as a “Type 8”?

For the 2022 EEO-1 data collection, either Status Code=4 or Status Code=8 indicates an existing “Establishment-Level Report” that has been included in prior-year EEO-1 Component 1 reports and has an existing Establishment-Level Unit ID assigned by the *EEO-1 Component 1 Online Filing System* (OFS).¹⁶

Sample CSV/TXT Data Files

¹⁴ See the section entitled “Specifications for New Non-Headquarters Establishments” in the *2022 EEO-1 Component 1 Data File Upload Specifications* for additional information available at https://www.eeocdata.org/pdfs/2022_EEO_1_Component_1_Data_File_Upload_Specifications.pdf.

¹⁵ See the section entitled “Specifications for New Non-Headquarters Establishments” in the *2022 EEO-1 Component 1 Data File Upload Specifications* for additional information available at https://www.eeocdata.org/pdfs/2022_EEO_1_Component_1_Data_File_Upload_Specifications.pdf.

¹⁶ See “Field 2: Status Code” in the *2022 EEO-1 Component 1 Data File Upload Specifications* for additional information available at https://www.eeocdata.org/pdfs/2022_EEO_1_Component_1_Data_File_Upload_Specifications.pdf.



42. *When will an updated CSV data file upload sample be available for companies to use to prepare their data file upload for the 2022 EEO-1 Component 1 reporting cycle?*

The 2022 EEO-1 Component 1 sample data files (CSV and TXT) will be available on the dedicated EEO-1 Component 1 website at www.eeocdata.org/eeo1 when data collection opens on Tuesday, October 31, 2023.

Obsolete Data Fields

43. *For the data file upload option, why must filers include fields in their data file that are no longer processed?*

For the 2022 EEO-1 Component 1 data collection, the EEOC's Office of Enterprise Data and Analytics (OEDA) left such fields as-is (i.e., "NULL") to minimize the number of edits that filers need to make to the programs and/or processes used to produce the 2022 EEO-1 Component 1 data file.

Field 189 Comment

44. *For "Field 189 Comment" in the 2022 EEO-1 Component 1 Data File Upload Specifications, must a filer use the comment field when they upload the data file? If so, do you have any specific directions (e.g., Column #, Column Name, Length, Column Type and Possible Values & Remarks)? Where are all the changes to the data file upload specs for the 2022 data collection?*

All changes to the 2022 EEO-1 Component 1 data file upload specifications are listed in Section 2 (Summary of Updates to Data File Upload Specifications) of the *2022 EEO-1 Component 1 Data File Upload Specifications* available on the EEOC's dedicated EEO-1 Component 1 website at <https://www.eeocdata.org/EE01/home/datafilespecs>. Data entered into "Field 189" will appear in the "Certification Comments" (Section K) of the EEO-1 Component 1 PDF-generated report for single-establishment filers or the "Headquarters or Establishment-Level Comments" (Section J) of the EEO-1 Component 1 PDF-generated report for multi-establishment filers. See "Field 189: Employer/HQ/Establishment Comments" in the *2022 EEO-1 Component 1 Data File Upload Specifications* for additional information (e.g., TXT Positions, CSV Column, Length).