



EEO-1 / EEO-4 Data Readiness Checklist

Know whether you must file, get the demographic data clean, and assign an owner — before the portal opens.

WHAT THIS HELPS YOU DO

Use this checklist to determine EEO-1 (private) or EEO-4 (state/local government) filing obligations, assemble accurate employee demographic data by job category, and assign ownership before the filing window opens.

WHEN TO USE THIS DOCUMENT

- When headcount approaches 100 employees (or 50 with federal contracts)
- At the start of each filing cycle, before the portal opens
- After a merger, acquisition, or rapid growth changes obligations
- For governments: in even-numbered EEO-4 filing years
- When no one can say who filed last time, or whether anyone did

WHAT THIS DOCUMENT HELPS PREVENT

- Missed filings discovered during contract bids or litigation
- Race/ethnicity data assembled by manager guesswork
- Job categories mapped by title instead of actual duties
- Workforce snapshots pulled from the wrong pay period
- A compliance obligation that lives in nobody's job description

Faulkner HR Solutions focuses on the system behind the people problem. This tool is designed to help employers slow down the decision, identify the risk, and create proof before the issue becomes a claim, complaint, turnover event, or credibility problem.

BEFORE YOU START: READINESS CHECKLIST

Gather the following before working through this document. Incomplete inputs are one of the most common reasons employer decisions fail under later scrutiny.

Have it	Input	Notes / location
☐	Employee name and role	
☐	Date of incident, request, or separation	



Have it	Input	Notes / location
☐	Supervisor involved	
☐	Policy or handbook section that applies	
☐	Prior documentation on file	
☐	Pay records, if applicable	
☐	Relevant emails, texts, notes, or complaints	
☐	Decision-maker name	
☐	Deadline, if applicable	



DATA READINESS CHECKLIST

The filing itself is simple; the data behind it is where employers fail. Confirm the obligation, clean the data, and name an owner — in that order.

Part 1 — Filing Obligation

Report	Who must file	Applies?	Notes
EEO-1	Private employers with 100+ employees; federal contractors with 50+ employees and a qualifying contract		
EEO-4	State and local governments with 100+ full-time employees (biennial, odd-year data)		
EEO-3 / EEO-5	Local unions / public school districts meeting thresholds		

Part 2 — Snapshot and Counts

Done	Count step	Notes
☐	Workforce snapshot period selected per current instructions (EEO-1: a pay period in Q4)	
☐	All employees counted — full-time and part-time — as instructions require	
☐	Multi-establishment structure mapped (headquarters + each location's reports)	
☐	Counts reconciled against payroll, not the org chart	

Part 3 — Job Category Mapping

Map by actual duties, not title inflation. 'Manager' who manages no one is not Officials & Managers.

EEO category	Your roles mapped to it	Verified
Officials & Managers (Exec/Senior + First/Mid for EEO-1)		
Professionals		
Technicians		
Sales Workers / Protective Service (EEO-4)		
Administrative Support		
Craft Workers		
Operatives / Laborers / Service Workers		



Part 4 — Demographic Data Quality

Done	Data step	Notes
☐	Self-identification is the preferred source — invitation sent with a clear voluntary statement	
☐	Self-ID form offers the current race/ethnicity categories and binary sex categories the form requires	
☐	Visual identification used only where self-ID is declined (document that it was)	
☐	Data stored confidentially, separate from managers' day-to-day view	
☐	New hires since last cycle have self-ID on file	
☐	EEO-4 only: salary band and full-time/part-time status data ready	

Part 5 — Ownership and Filing Record

Report owner (name and role)	
Backup owner	
Portal credentials location (and who controls them)	
Filing deadline this cycle	
Date filed and confirmation number	
Copy of filed report stored at	

Role	Name / signature	Date
Data prepared by		
Certified / filed by		

STOP AND REVIEW BEFORE ACTING

If any statement below is true, pause. Get the decision reviewed by HR, counsel, or Faulkner HR Solutions before you act.

- ☐ You hold federal contracts and cannot produce your last EEO-1 confirmation.
- ☐ Race/ethnicity fields in the HRIS are blank for a third of the workforce.
- ☐ Job categories were copied from a decade-old spreadsheet no one has re-verified.



- ☐ The person who 'always did this' left, along with the portal login.
- ☐ Headcount crossed 100 two years ago and nobody noticed the obligation began.

MINIMUM DOCUMENTATION STANDARD

Before this file is closed, the employer should be able to answer every question below and point to where the proof lives.

Question	Your answer / where the proof is stored
What happened?	
When did it happen?	
Who observed or reported it?	
What policy, standard, deadline, or expectation applies?	
What decision was made?	
Who had authority to make the decision?	
What alternatives were considered?	
What risk was reviewed?	
What follow-up is required?	
Where is the proof stored?	

COMMON MISTAKES

1. Assuming EEO-1 data is anonymous to litigation — filed reports are discoverable and comparable year over year.
2. Guessing demographics instead of running a proper self-ID campaign.
3. Mapping every 'lead' and 'coordinator' into Officials & Managers.
4. Using a January pay period for a snapshot the instructions define as Q4.
5. Missing that the obligation is per-establishment, not just company-wide.
6. Treating the biennial EEO-4 rhythm as 'we'll remember' — nobody remembers.

WHAT TO DO NEXT

Close the data gaps found here, run the self-ID campaign for missing demographics, calendar the filing window, and file. Keep the confirmation with this checklist — the next question after 'did you file' is always 'prove it.'

Before you terminate, deduct, discipline, classify, or respond, get the decision reviewed.



Call 210.446.8730 or email thomas@faulknerhrsolutions.info.



Before you process payroll, terminate, classify, deduct, or respond to a claim, get the decision reviewed.

Need help applying this to a real workplace decision?

Faulkner HR Solutions helps Texas employers, nonprofits, municipalities, and growing businesses fix the people systems behind recurring workplace problems.

If this document raised a risk flag, do not guess your way through the next step.

Call: 210.446.8730

Email: thomas@faulknerhrsolutions.info

Website: faulknerhrsolutions.info

DISCLAIMER

This resource is provided for general employer education and planning purposes. It is not legal advice and does not create an attorney-client relationship. Employment laws, agency guidance, and local requirements may change. Employers should review the facts of each situation before acting and consult appropriate HR or legal counsel when needed.