

# Employers with Employees Working in California It's Time to Report your Pay Data - California Releases Updated Guidance on Pay Data Reporting for 2024

## Labor & Employment Law Update

By Sara Zorich on February 22, 2024

California's equal pay data reporting law applies to private companies that have at least 100 employees nationwide on payroll and at least one California employee. The reporting deadline for the 2023 reporting year is May 8, 2024. Employers must upload their California employee pay data no later than this date. Employers only need to report on their California employees and employees reporting to a California establishment. According to the California Civil Rights Department, employers should not report employees who are working outside of California and are assigned to an establishment outside of California (i.e., non-California employees). PDR FAQs – 2023 Reporting Year | CRD (ca.gov)

Employers with over 100 employees and any California employees need to be reviewing their pay data in preparation for the filing deadline. The California Civil Rights Department sets forth the steps employers should follow to report:

1. Determine the employer's "Snapshot Period" to identify the California employees who will be reported.
2. Determine which California establishments the employer has and gather information about each California establishment.
3. For all California employees in the Snapshot Period, identify each employee's establishment, job category, race/ethnicity, sex, pay in 2023, pay band, hours worked in 2023, and status as a remote worker.
4. Within each establishment, group California employees who have the same job category, pay band, and race/ethnicity/sex combination.
5. Within each employee group in each establishment, calculate the total hours worked by the group, calculate the group's mean hourly rate and the group's median hourly rate.

6. Within each employee group in each establishment, identify the number of workers who were remote workers during the Snapshot Period.
7. Gather additional information about the employer and its establishments, including the employer's address on file with the California Employment Development Department (EDD), total number of employees in the United States, total number of employees in California, Federal Employer Identification Number (FEIN), California Employer Identification Number (SEIN), North American Industry Classification System (NAICS) code(s), DUNS Number, and whether the employer is a state contractor.
8. Register in the portal and build the report. First, in the portal, provide information about the employer and, if relevant, its parent company, as well as information on all affiliated entities included in the report (Employer Info and Submission Info). Next, provide establishment-level and employee-level information (Establishment and Employee Details) by uploading an Excel file by using CRD's template, uploading a .CSV file, or using the portal's fillable forms.
9. Provide any clarifying remarks in the relevant field(s) and correct any errors identified by the portal.
10. Certify the final report and submit it by May 8, 2024.

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