

Preventing and Responding to EEOC Charges Against County Social Services Agencies

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Roadmap



1. What laws does the EEOC enforce?
2. What's the role of the OAH?
3. What is the process of receiving and responding to an EEOC charge?

What laws does the EEOC enforce?

Title VII of the Civil Rights Act of 1964 (Title VII)

- Makes it illegal to discriminate against someone on the basis of
 - **Race**
 - **Color**
 - **Religion**
 - **National origin**
 - **Sex**



Disparate Treatment – What Does Plaintiff Have to Show?

Employee is required to show:

1. membership in a protected class;
2. adverse employment action;
3. meeting employer's legitimate expectations at the time of the adverse employment action; and
4. different treatment from similarly situated employees outside the protected class.



If Plaintiff establishes prima facie case, then...

- Burden shifts to employer to show a **legitimate, nondiscriminatory reason** for its behavior.
- Burden shifts back to employee to offer evidence that the employer's explanation is mere **pretext** for intentional discrimination.



Case Study

- African-American man was hired by home mortgage loan company.
- Leadership started receiving customer complaints about job performance and coworker complaints about employee's attitude.
- Following counseling, employee sent an insubordinate email to supervisor.
- Employee refused to attend weekly conference calls with his colleagues.
- On Feb. 1, supervisor requested employee get her approval before issuing decisions to lenders.
- On Feb. 6, leadership sent a memo to HR describing reasons for termination.
- On February 19, employee filed a "Misconduct Report" complaining of "a hostile work environment" -- did not mention racial discrimination.
- Terminated on February 20.
- Discrimination? Retaliation?

***Billingsley v. Fed. Home Loan Mortg. Corp.*, 2019 WL 5104748 (E.D. Va. Oct. 10, 2019), aff'd, 849 F. App'x 413 (4th Cir. 2021)**

- **Employee was not meeting his employer's legitimate expectations**
 - Multiple complaints from customers and coworkers, refusal to accept feedback or adjust conduct
- **Supervisor requesting to approve employee's decisions--not an adverse employment action**
 - “Mere additional oversight where a plaintiff retained the same responsibilities, pay, and benefits does not constitute an adverse employment action.”
- **Termination was not retaliatory**
 - Decision was made before employee complained
 - “Hostile work environment” complaint was about interpersonal conflicts and never mentioned race

Title VII – Religious Accommodation

- Requires that employers reasonably accommodate applicants' and employees' *sincerely held* religious practices, unless doing so would impose an undue hardship on the operation of the employer's business.
 - Examples:
 - Schedule changes or leave for religious observances
 - Dress or grooming practices
- Religious discrimination and harassment are also prohibited



Groff v. Dejoy (2023)

- Former postal worker sued the USPS for failing to accommodate his religious practice (observation of Sunday sabbath).
- Lower courts ruled that the accommodation created an undue hardship because it disrupted workflow and diminished employee morale.
- **Supreme Court:** Employers must show that the burden of granting accommodation “**would result in substantial increased costs in relation to the conduct of its particular business.**”
 - “[I]t would not be enough for an employer to conclude that forcing other employees to work overtime would constitute an undue hardship.”
 - Employer must consider other alternatives, such as “voluntary shift swapping.”



Case Study

- Company requires all employees to attend daily Christian prayer meetings.
- Atheist employee asked to be excused, agnostic employee stopped attending.
- Company fires both employees.
- Discrimination?



EEOC v. Aurora Renovations and Developments, LLC d/b/a Aurora Pro Services (M.D.N.C. June 27, 2022)

- EEOC sued a North Carolina home service and repair company for Title VII violations
- Discrimination, harassment, and retaliation allegations
- Case settled for \$50,000



Title VII

- How do you provide religious accommodation when doing so might violate someone else's rights under Title VII?



EEOC Guidance

“Religious expression can create undue hardship if it disrupts the work of other employees or constitutes—or threatens to constitute—unlawful harassment....

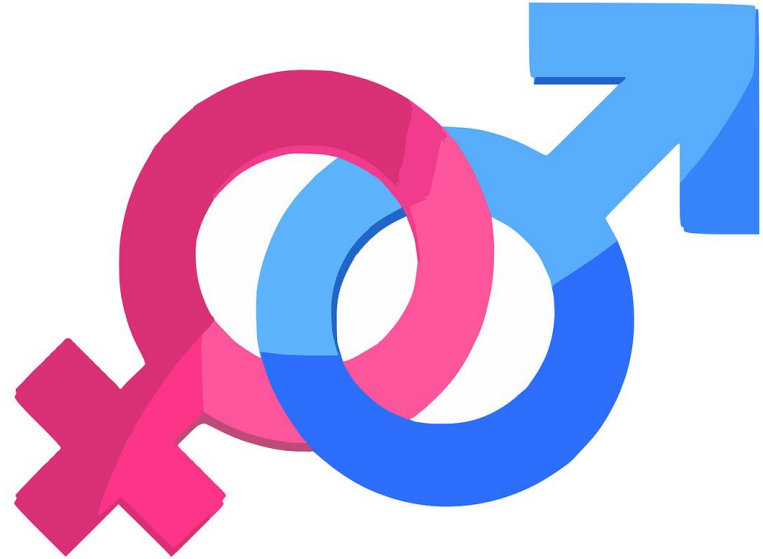
Since an employer has a duty under Title VII to protect employees from harassment, it would be an undue hardship to accommodate expression that is harassing.”

Case Examples

- *Peterson v. Hewlett-Packard Co.*, 358 F.3d 599 (9th Cir. 2004) -- not religious discrimination for a company to terminate an employee for placing anti-gay messages in his cubicle that “demean[ed] and harass[ed] his co-workers”
- *Matthews v. Wal-Mart Stores, Inc.*, 417 F. App'x 552 (7th Cir. 2011) -- not discriminatory to terminate an employee for expressing that gay people will go to hell because such comments constituted harassment
- *Rightnour v. Tiffany & Co.*, 354 F. Supp. 3d 511 (S.D.N.Y. 2019) -- not discriminatory to terminate Catholic employee who told Jewish employee “your people killed Jesus”

Title VII – “On the basis of sex”

- Sex-based discrimination
- Sexual harassment
- Sex stereotyping
- Sexual orientation
- Gender identity



Equal Emp. Opportunity Comm'n v. R.G. & G.R. Harris Funeral Homes, Inc., 884 F.3d 560 (6th Cir. 2018)

- Male employee at funeral home expressed intent to transition to female, was subsequently fired
 - “Under any circumstances, sex stereotyping based on a person's gender non-conforming behavior is impermissible discrimination.”
 - “Customer preferences cannot transform a person's gender into a relevant consideration for a particular position.”



Bostock v. Clayton County, 140 S. Ct. 1731, 2020

Held that Title VII protects employees from discrimination or harassment based on their gender identity or sexual orientation

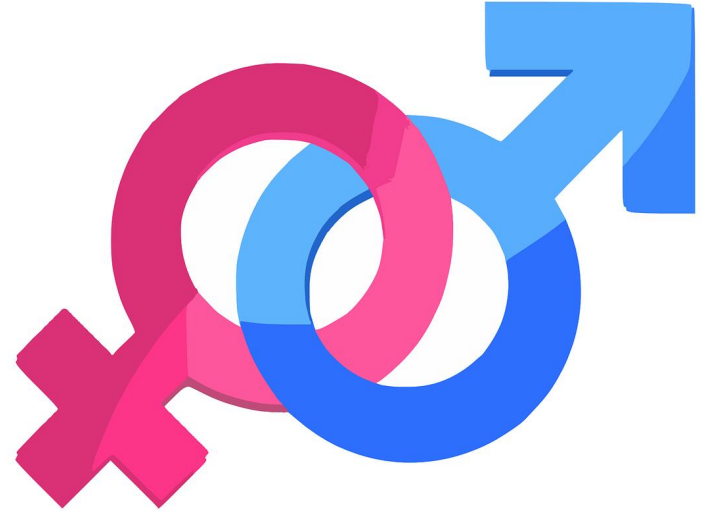


***Bostock v. Clayton County*, 140 S. Ct. 1731, 2020**

- “Consider, for example, an employer with two employees, both of whom are attracted to men. The two individuals are, to the employer’s mind, materially identical in all respects, except that one is a man and the other a woman. If the employer fires the male employee for no reason other than the fact he is attracted to men, the employer discriminates against him for traits or actions it tolerates in his female colleague. Put differently, the employer intentionally singles out an employee to fire based in part on the employee’s sex....
- “Or take an employer who fires a transgender person who was identified as a male at birth but who now identifies as a female. If the employer retains an otherwise identical employee who was identified as female at birth, the employer intentionally penalizes a person identified as male at birth for traits or actions that it tolerates in an employee identified as female at birth.”

Title VII – EEOC guidance on gender

- EEOC: “Prohibiting a transgender person from dressing or presenting consistent with that person’s gender identity would constitute sex discrimination.”
- EEOC has taken the position that employers may not deny an employee equal access to a bathroom that corresponds to the employee’s gender identity.



Case Study

- Grocery store started requiring some of its employees to wear a new uniform adorned with a rainbow-colored heart.
- Some employees thought the heart symbolized for the LGBTQ community and refused to wear the uniform.
- Two employees were disciplined and fired after refusing to wear the uniform/display the heart for weeks.
- Discrimination?



EEOC v. Kroger Ltd. Partnership I (E.D. Ark. June 23, 2022)

- Kroger paid \$180,000 to settle the case after two years of litigation
- Required Kroger to create a religious accommodation policy and give more religious discrimination training
- *Where did Kroger go wrong?*



Title VII - Retaliation

- Makes it illegal to retaliate against a person because the person:
 - opposed discrimination,
 - filed a charge of discrimination, or
 - participated in an employment discrimination investigation or lawsuit.



Title VII - Retaliation

- An employee's communication to the employer that the employer has engaged in a form of employment discrimination "virtually always" constitutes oppositional conduct .
 - *Crawford v. Metro. Gov't of Nashville & Davidson Cnty., Tenn.*, 555 U.S. 271 (2009).

Employee must have
a reasonable, good
faith belief that
employer's conduct
violated Title VII
(but doesn't have to
be correct!)

Examples of Retaliation

- Termination
- Harassment
- Demotion
- Taking away a perk
- Isolation/shunning
- Reallocation of job duties

Would the adverse action dissuade a reasonable employee from making or supporting a charge of discrimination?

Can you articulate a legitimate, nonretaliatory reason for the adverse action?

Were similarly situated employees treated the same?

Case Study

- HR department of a local government began an investigation into the employee relations director for a school district
- When questioned during investigation, a female employee described multiple instances of sexual harassment from this employee relations director
- Female employee was terminated by school board several years later
- Retaliation?



Crawford v. Nashville, 555 U.S. 271 (2009)

- **Lower courts:** Not retaliation covered by Title VII, because 1) investigation was internal (no EEOC charge), and 2) statements in investigation were not “opposition.”
- **Supreme Court:** Reporting discrimination or harassment in an investigation, even an internal one, can constitute “opposition” to unlawful activity.



The Age Discrimination in Employment Act (ADEA)

- Protects people who are 40 or older from discrimination because of age.
- Can't express a preference for younger employees



The Americans with Disabilities Act (ADA)

- Makes it illegal to discriminate against a qualified person with a disability.
- Requires that employers reasonably accommodate the **known physical or mental limitations** of an **otherwise qualified individual with a disability** who is an applicant or employee, unless doing so would impose an **undue hardship** on the operation of the employer's business.



The Americans with Disabilities Act (ADA)

- Reasonable accommodations may include:
 - Physical modifications to workspace
 - Unpaid leave time
 - Modified schedule (part-time or different hours)
- Must engage in the interactive process with the employee



The Americans with Disabilities Act (ADA)

- An employer does not have to remove any essential functions of an individual's job, allow an employee to do less work for the same amount of pay, or accept lower quality work as an accommodation
- Don't have to accept the employee's preferred accommodation
- Unpaid leave—even after FMLA and other leave has expired—may be considered a reasonable accommodation in some cases



Case Study

- County tax auditor had ulcerative colitis, wanted to work a flexible schedule or work from home
- County did not allow auditors to access its tax software remotely—taxpayer records must be reviewed at the office.
- County required auditors to work during regular business hours so that they can perform audits and be available to provide tax advice and answer questions from members of the public.
- Auditor was terminated.



Ryerson v. Jefferson Cnty. Comm'n, No. 20-14684, 2021 WL 3629906 (11th Cir. Aug. 17, 2021)

- “[An] accommodation is only reasonable if it allows the disabled employee to perform the essential functions of the job in question...because the only evidence presented showed that the job of a county tax auditor requires the employee to spend most of her time either in the field conducting audits at taxpayers’ businesses or at the county revenue office, [the employee’s] proposed accommodation of allowing her to work from home was not reasonable.”



The Pregnant Workers Fairness Act (PWFA)

- Went into effect June 27, 2023
- Requires that a covered entity provide a reasonable accommodation to a qualified worker's known limitation related to pregnancy, childbirth, or related medical conditions, unless doing so would cause an undue hardship.



The Pregnant Workers Fairness Act (PWFA)

- Possible accommodations:
 - Ability to sit or drink water
 - Closer parking
 - Flexible hours
 - Additional break time to use the bathroom, eat, and rest
 - Leave or time off to recover from childbirth
 - Being excused from strenuous activities



Harassment

- Can violate Title VII, ADA, or ADEA
- Unwelcome conduct based on race, color, religion, sex (including sexual orientation, gender identity, or pregnancy), national origin, older age (40+), disability, or genetic information.

Unlawful when:

Enduring the offensive conduct becomes a condition of continued employment, OR

The conduct is **severe** or **pervasive** enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.





When Harassment Violates the Law

Harassing conduct must be:

- **1) unwelcome** and
- **2) based on the victim's protected status.**

The conduct must be:

- **subjectively abusive** to the person affected; and
- **objectively severe and pervasive** enough to create a work environment that a reasonable person would find hostile or abusive.



Hostile Work Environment Harassment

Can result from unwelcome conduct of supervisors, co-workers, clients, contractors, or anyone else with whom the employee interacts on the job.

Examples of behaviors that may contribute to an unlawful hostile environment include:

- discussing sexual activities;
- telling off-color jokes concerning race, sex, disability, or other protected bases;
- unnecessary touching;
- commenting on physical attributes;
- displaying sexually suggestive or racially insensitive pictures;
- using demeaning or inappropriate terms or epithets;
- using crude language;
- sabotaging the victim's work; or
- engaging in hostile physical conduct.



Quid Pro Quo Harassment — "This for That"

- Typically involves tangible employment action on the basis of the employee's acceptance or rejection of unwelcome sexual advances or requests for sexual favors
- Examples:
 - Supervisor fires or denies promotion to a subordinate for refusing to be sexually cooperative.
 - Supervisor requires a subordinate to participate in religious activities as a condition of employment.
 - Supervisor offers preferential treatment/promotion if subordinate sexually cooperates.

Third-Party Harassment

An employer is liable under Title VII for the actions of **third parties** creating a hostile work environment if the employer:

- **knew or should have known of the harassment**, and
- **failed to take prompt remedial action** reasonably calculated to end the harassment.

Freeman v. Dal-Tile Corp., 750 F.3d 413 (4th Cir. 2014)



“An employer may not avoid Title VII liability for third-party harassment by adopting a ‘see no evil, hear no evil’ strategy.”

Harassment

Strict liability
when harasser
is a supervisor,
unless

- 1) No tangible employment action was taken;
- 2) Employer **reasonably** tried to prevent and promptly correct the harassing behavior; and
- 3) The employee **unreasonably** failed to take advantage of any preventive or corrective opportunities provided by the employer.

The OAH's Role

OAH's Relationship to the EEOC

- OAH's Civil Rights Division-Employment Discrimination Section (CRD-EDS) has a work-sharing agreement with the EEOC
 - Charge filed w/ the CRD-EDS and also covered by federal law → the CRD-EDS files the charge w/ EEOC, but generally retains the charge for processing and investigation.
 - Charge filed w/ the EEOC and also covered by state law → EEOC files the charge with the CRD-EDS, but typically retains the charge for handling.



Filing a Charge w/ CRD-EDS



- **Who?**
 - Any state or county employee who is or was subject to the SHRA.
- **When?**
 - Charge must be filed with CRD-EDS within **180** days from the date of the alleged violation.
 - County employees covered by SHRA have **300** days to file a charge directly with **EEOC**.
 - *If a charge is received by the CRD-EDS after 180 days, it will be transferred directly to the EEOC.*

CRD-EDS Investigation Process

- Employer is notified of the charge filing and receives a copy.
- Charge assigned to a CRD-EDS Investigator for processing and investigation.
- CRD-EDS sends RFI to employer (normally 4-6 weeks to respond)
- CRD-EDS Investigator conducts investigation (may include onsite investigation and interviews).



CRD-EDS Determinations and Conciliations

- CRD-EDS Investigator makes a no-cause or cause recommendation; CRD-EDS Director makes final determination.
- **No Cause** = notice of determination sent to all parties.
 - Closes the case; charging party has 90 days to file a lawsuit after receiving “Dismissal and Notice of Rights” from the EEOC
- **Cause** = all parties receive a notice of determination explaining findings of fact
 - CRD-EDS will attempt conciliation w/ employer to develop a remedy for discrimination
 - *Successful conciliation*: Parties sign agreement; charging party may not file a lawsuit unless conciliation agreement is not honored.
 - *Unsuccessful conciliation*: Case directed to EEOC for review and processing (EEOC may try to conciliate again).

The EEOC Charge Process

- Contact info
- Discrimination based on....
- Date(s) discrimination took place
- The particulars are....

EEOC Form 5 (04/00)		CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: _____ Agency(ies) Charge No(s): _____	
_____ and EEOC State or local Agency, if any					
Name (indicate Mr., Ms., Mrs., Miss, Mx., Dr., Hon., Rev., etc.)		Home Phone		Year of Birth	
Street Address, City, State and ZIP Code					
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)					
Name		No. Employees, Members		Phone No.	
Street Address, City, State and ZIP Code					
Name		No. Employees, Members		Phone No.	
Street Address, City, State and ZIP Code					
DISCRIMINATION BASED ON		DATE(S) DISCRIMINATION TOOK PLACE Earliest _____ Latest _____			
THE PARTICULARS ARE: (If additional paper is needed, attach extra sheets):					
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements			
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT			
_____ Date		_____ Charging Party Signature			
SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)					

Notice of Charge

- Within 10 days
- Date to respond to EEOC's request for information
- Date for position statement and copies of supporting documentation
- Opportunity to express interest in mediation
- Type of alleged discrimination
- Copy of charge

U. S. Equal Employment Opportunity Commission		
EEOC FORM 121 (11-89)		PERSON FILING CHARGE
<div></div>		THIS PERSON (check one or both)
		<input type="checkbox"/> Claims To Be Aggrieved <input type="checkbox"/> Is Filing on Behalf of Other(s)
		EEOC CHARGE NO.
NOTICE OF CHARGE OF DISCRIMINATION (See the enclosed for additional information)		
This is notice that a charge of employment discrimination has been filed against your organization under:		
<input type="checkbox"/> Title VII of the Civil Rights Act (Title VII) <input type="checkbox"/> The Equal Pay Act (EPA) <input type="checkbox"/> The Americans with Disabilities Act (ADA) <input type="checkbox"/> The Age Discrimination in Employment Act (ADEA) <input type="checkbox"/> The Genetic Information Nondiscrimination Act (GINA)		
The boxes checked below apply to our handling of this charge:		
1. <input type="checkbox"/> No action is required by you at this time.		
2. <input type="checkbox"/> Please call the EEOC Representative listed below concerning the further handling of this charge.		
3. <input type="checkbox"/> Please provide by _____ a statement of your position on the issues covered by this charge, with copies of any supporting documentation to the EEOC Representative listed below. Your response will be placed in the file and considered as we investigate the charge. A prompt response to this request will make it easier to conclude our investigation.		
4. <input type="checkbox"/> Please respond fully by _____ to the enclosed request for information and send your response to the EEOC Representative listed below. Your response will be placed in the file and considered as we investigate the charge. A prompt response to this request will make it easier to conclude our investigation.		
5. <input type="checkbox"/> EEOC has a Mediation program that gives parties an opportunity to resolve the issues of a charge without extensive investigation or expenditure of resources. If you would like to participate, please say so on the enclosed form and respond by _____ to _____		
If you DO NOT wish to try Mediation, you must respond to any request(s) made above by the date(s) specified there.		
For further inquiry on this matter, please use the charge number shown above. Your position statement, your response to our request for information, or any inquiry you may have should be directed to:		
_____ EEOC Representative Telephone _____		
Enclosure(s): <input checked="" type="checkbox"/> Copy of Charge		
CIRCUMSTANCES OF ALLEGED DISCRIMINATION		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Sex <input type="checkbox"/> Religion <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Retaliation <input type="checkbox"/> Genetic Information <input type="checkbox"/> Other		
See enclosed copy of charge of discrimination.		
Date	Name / Title of Authorized Official	Signature

Notice of Charge

- Check the date filed and count backwards—was charge timely filed?
- Discrete acts of discrimination alleged?
- “Continuing violations”?
- Protected class? Retaliation?

U. S. Equal Employment Opportunity Commission		
EEOC FORM 131 (11-09)		PERSON FILING CHARGE
<div style="border: 1px solid black; height: 100px; width: 100%;"></div>		THIS PERSON (check one or both)
		<input type="checkbox"/> Claims To Be Aggrieved <input type="checkbox"/> Is Filing on Behalf of Others(s) EEOC CHARGE NO.
NOTICE OF CHARGE OF DISCRIMINATION (See the enclosed for additional information)		
This is notice that a charge of employment discrimination has been filed against your organization under:		
<input type="checkbox"/> Title VII of the Civil Rights Act (Title VII) <input type="checkbox"/> The Equal Pay Act (EPA) <input type="checkbox"/> The Americans with Disabilities Act (ADA) <input type="checkbox"/> The Age Discrimination in Employment Act (ADEA) <input type="checkbox"/> The Genetic Information Nondiscrimination Act (GINA)		
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If you DO NOT wish to try Mediation, you must respond to any request(s) made above by the date(s) specified there.		
For further inquiry on this matter, please use the charge number shown above. Your position statement, your response to our request for information, or any inquiry you may have should be directed to:		
_____ EEOC Representative Telephone _____		
Enclosure(s): <input checked="" type="checkbox"/> Copy of Charge		
CIRCUMSTANCES OF ALLEGED DISCRIMINATION		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Sex <input type="checkbox"/> Religion <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Retaliation <input type="checkbox"/> Genetic Information <input type="checkbox"/> Other		
See enclosed copy of charge of discrimination.		
Date	Name / Title of Authorized Official	Signature

First Steps



Contact county
attorney



Issue internal
notice to preserve
documents

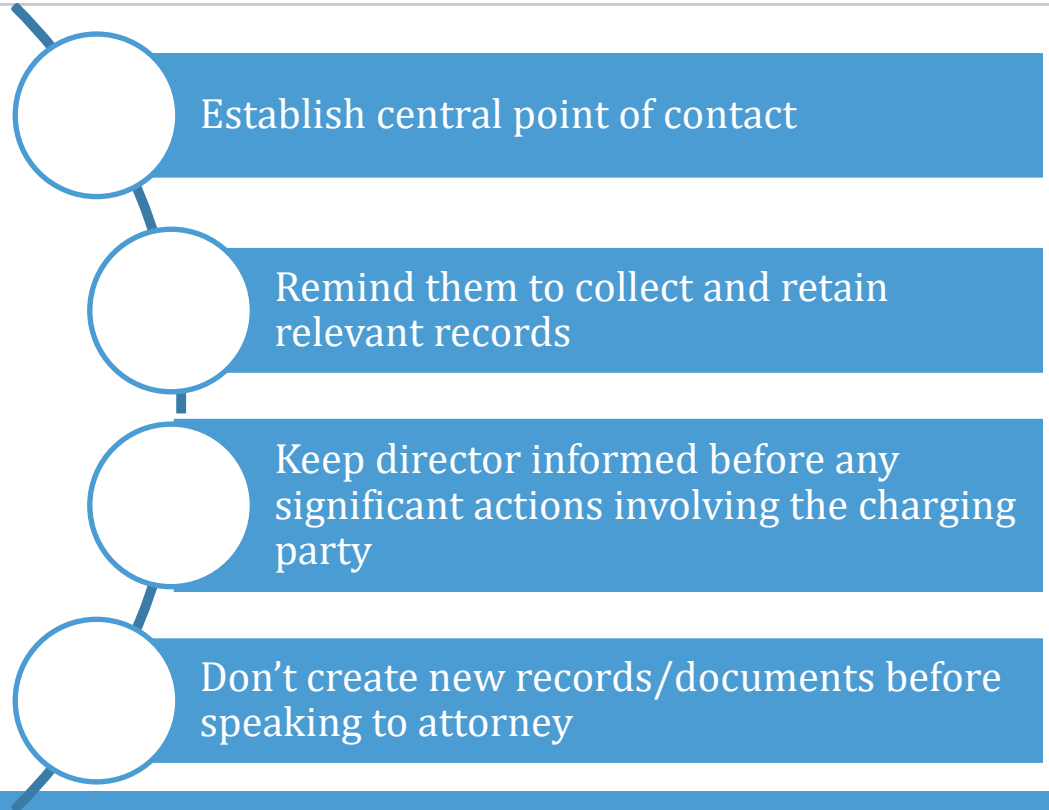


Notify insurer

First Steps



Talk to supervisor(s)
of the charging party



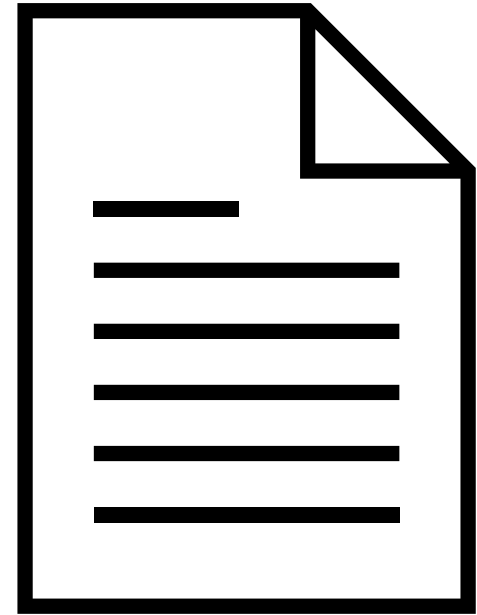
EEOC Mediation



- Voluntary and confidential
- EEOC mediators, but no stake in outcome or authority to impose a settlement
- Can happen before investigation, during investigation, or at conciliation stage (after finding of discrimination)
- Send someone w/ settlement authority

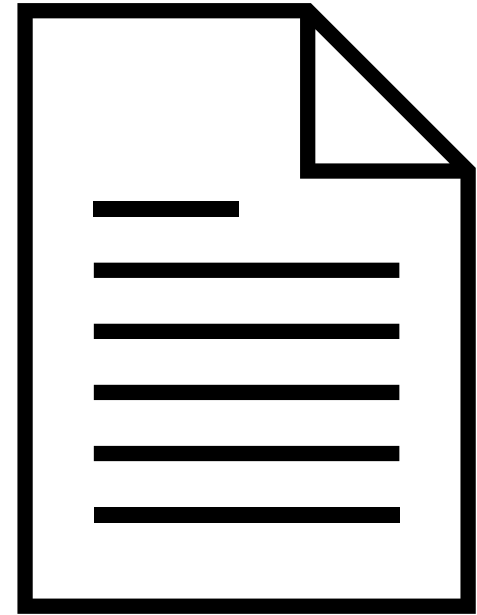
Preparing the Position Statement

- Highlight EEO policy, commitment to diversity
- Specific, factual responses to each allegation
- Give big picture context of your workplace
- Address comparators
- Include dates, names, actions
- Can include legal arguments



Preparing the Position Statement

What was the non-discriminatory reason for the alleged adverse action?



Supporting Documents

- Reference documents throughout position statement (Exhibit A, B, C, etc)
- Confidential information should be uploaded in separate labeled attachments to the position statement.
 - *Sensitive medical info (not Charging Party's)*
 - *SSNs*
 - *Non-relevant personally identifiable information of witnesses, comparators or third parties*



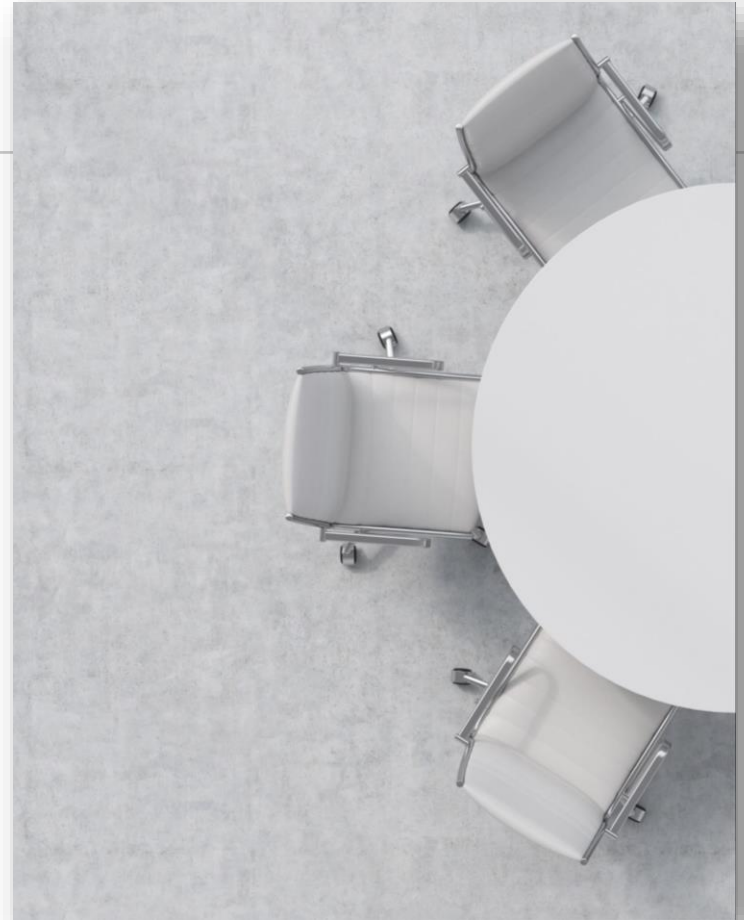
Requests for Information

- EEOC may request documents, information, or interviews
- Can issue administrative subpoenas
- **G.S. 153A-98(c)(5)**– “An official of an agency of the State or federal government...may inspect any portion of a personnel file when such inspection is deemed by the official having custody of such records to be inspected to be necessary and essential to the pursuance of a proper function of the inspecting agency.”



EEOC Conciliation

- “Letter of Determination” → EEOC determined there is reasonable cause to believe discrimination has occurred.
- Parties invited to engage in conciliation w/ EEOC.
- **How is this different from mediation?**



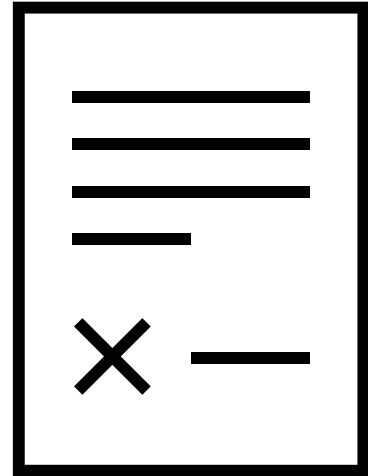
The Settlement Agreement

Potential non-monetary terms:

- Non-admission clause
- Reinstatement/promotion
- Neutral reference
- Resignation statement (check for expungement language)
- Apology letter
- No-retaliation
- Non-disparagement (read closely!)
- Training
- Reporting to EEOC

Potential monetary terms:

- Attorney's fees
- Compensatory damages
- Backpay
- Outplacement service fee



After unsuccessful conciliation...



- EEOC has the authority to enforce violations of these statutes by filing a lawsuit in federal court.
- If the EEOC decides not to litigate, the charging party will receive a **Notice of Right to Sue**.
 - May file a lawsuit in federal court within 90 days.

Will EEOC litigate?



In FY2022, the EEOC:

- Received 73,485 charges of discrimination
- Resolved 65,087 charges
- Filed 91 merits lawsuits

EEOC - FY2022 Lawsuits

<u>FY</u>	<u>Sex-Female</u>	<u>Sex-Preg.</u>	<u>Sex-Male</u>	<u>Sex - LGBTQ</u>	<u>Race</u>	<u>Color</u>	<u>Nat'l Origin</u>	<u>Relig.</u>	<u>Disab.</u>	<u>Genetic Info.</u>	<u>Age</u>	<u>Retal.</u>
2018	26.1%	9.5%	3.5%	1.0%	8.0%	0.5%	4.0%	4.5%	42.2%	0.0%	4.5%	25.6%
2019	29.2%	8.3%	4.9%	0.0%	11.1%	0.0%	2.8%	4.9%	36.8%	0.0%	4.2%	32.6%
2020	25.8%	9.7%	2.2%	2.1%	14.0%	1.1%	4.3%	5.4%	31.2%	0.0%	7.5%	28.0%
2021	33.6%	6.9%	3.4%	0.9%	17.2%	0.9%	4.3%	4.3%	34.5%	0.0%	2.6%	37.1%
2022	36.3%	6.6%	5.5%	1.1%	18.7%	1.1%	6.6%	3.3%	29.7%	0.0%	6.6%	35.2%

Questions?

