Client Alert
California Pay Data Reporting for Reporting Year 2025

The California Pay Data Reporting for 2025 data is open until **May 13, 2026**. A representative from **the client-employer**, not the PEO, **must file and certify the report**. This means that Engage PEO's clients are responsible for submitting this data to the state of California. Your Account Manager/HR Business Partner will contact you the week of April 13th to provide further information.

Who must file: Employers of 100 or more employees and/or 100 or more workers hired through labor contractors with at least 1 employee in California must report employee pay data for each establishment by annual earnings, job category, sex, race, and ethnicity to the Civil Rights Department (CRD) annually. The employee threshold is determined by counting employees both inside and outside of California. This reporting is required under Government Code section 12999, as amended by Senate Bill 1162.

Important Details about Reporting:

- **New Due Date:** The due date for submitting pay data reports covering the 2025 reporting year is **May 13th, 2026**. There is no deferral period.
- **Additional Data Fields:** In addition to information regarding race/ethnicity, sex, job category, and pay band, employers must also include information regarding exemption status, employment type (full time, part time, or intermittent), and annual weeks worked.
- **Two Types of Pay Data Reports:** There are **Labor Contractor Employee Reports** and **Payroll Employee Reports**. Pay data regarding payroll employees should be filed separately from pay data regarding labor contractor employees. Employers may be required to file one or both types depending on the employer's workforce. An employer that has 100 or more payroll employees (with at least one in California) and 100 or more labor contractor employees (with at least one in California) during the reporting year will have to file two separate reports.
- **Report only California workers:** When reporting to the CRD, employers must report on their workers assigned to California establishments and/or working within California. Employers may not report on workers working outside of California and assigned to an establishment outside of California. For more information, see, for example, FAQ "Should an employer's Payroll Employee Report include only their California employees or all employees?"
- **Race, ethnicity, sex:** For Labor Contractor Employee Reports, reporting "unknown" race/ethnicity or sex of a labor contractor employee is no longer permitted.
- **Collecting Remote Worker Data:** To assist filers with accurate reporting of eligible California remote workers, three data fields were added to identify remote worker status for every employee detail collected:
  - Number of employees who do not work remotely.
  - Number of remote employees located in California.
  - Number of remote employees located outside of California assigned to a California establishment.

- **Collecting California Secretary of State (SoS) Number:** The California Secretary of State (SOS) number is the entity identification number assigned by the SOS when an employer registers its business with the state. If an employer has an SOS number, the employer should provide its SOS number when filing a pay data report with CRD.
  - The SoS is a seven or twelve-digit number. You can look up your SoS number at the following link: https://bizfileonline.sos.ca.gov/search/business.
  - If you want a SoS number, contact the Secretary of State at https://www.sos.ca.gov/administration/contact-information.
  - If you are a sole proprietor or are not required to register with the California Secretary of State, you may opt out of reporting a SoS number by toggling the “I do not have an SoS number” switch.

For clients who have been with Engage PEO for the full calendar year of 2025

- Engage PEO will prepare the required report, and your Account Manager/HR Business Partner will send it to you for review and upload by May 1, 2026.
- Once deemed accurate by your organization, the report must be uploaded by an official of the client employer on the CRD’s Pay Data Reporting Portal.
- Please review closely; should something change, the California Pay Data Report must be amended prior to your submission.

For clients who have not been with Engage PEO for the full calendar year of 2025

- You will receive the CA Pay Data Report to assist in the completion of the California Pay Data File that can be found on the California Pay Data Reporting Website.

The user guide will walk you through uploading and completing the certification verification on the 2025 California Pay Data Reporting Portal. For additional information, please view the California Pay Data Reporting Website, which includes a Pay Reporting Handbook and additional FAQs.