

California Releases Preliminary Guidance for 2025 Pay Reporting Cycle: What's New + Your 5-Step Employer Action Plan

Insights

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The California Civil Rights Department (CRD) recently released preliminary guidance, FAQs, and reporting templates for the 2025 pay data reporting cycle (reports currently due **May 13, 2026**). These materials outline significant changes that will impact how covered employers prepare and submit their pay data reports. While the guidance and templates may not ultimately be the final versions for the reporting cycle, employers should review the information for advance planning purposes. This Insight explains what's new this year and provides a five-step employer action plan.

What's New for Reporting?

In addition to the traditionally requested information regarding race/ethnicity, sex, job category, and pay band, the preliminary guidance and templates also seek categories of new information. Specifically, the new data fields relate to:

- **Exemption Status** – classification as either exempt or non-exempt for minimum wage and overtime purposes.
- **Employment Type** – categorized as full-time, part-time, or intermittent.
- **Weeks Worked** – total weeks worked during the reporting year, including paid time off (such as vacation or sick leave).

Employers currently not tracking this information should begin planning how to capture this information ahead of May's reporting deadline. CRD has indicated that the information will be optional for this reporting cycle, but it will likely be required for future reporting cycles.

CRD's Preliminary Excel Templates and FAQs

CRD also published [preliminary Excel templates and FAQs](#) for both Payroll Employee Reports and Labor Contractor Employee Reports, giving filers an early look at the expected data format. According to CRD, these templates are for planning and preparation only and should not be submitted with the actual filing. The **official** operative templates and related guidance will be released in **February 2026**, when CRD reopens the reporting portal.

Penalties for Pay Data Reporting Failures Now Mandatory. Gov. Newsom signed a bill ([SB 464](#)) into law in October that, starting in 2026, makes civil penalties for failures to comply with the state's pay data reporting requirements mandatory. Courts are now required (rather than permitted, which was the case under prior law) to impose such penalties upon CRD's request.

5-Step Employer Action Plan

- **Begin updating internal HR/payroll systems** to capture exemption status, employment type, and weeks worked.
- **Coordinate with labor contractors early** to ensure they can deliver required data.
- **Review existing data pipelines** to ensure accurate aggregation by the expanded reporting categories.
- **Continue to review updates from CRD** regarding the final templates and guidance, which are set to be released in February 2026.
- **Work with your counsel** to ensure proper filing and compliance steps.

More Changes Coming in 2027. Starting next year, "job categories" that must be covered in pay data reports will increase from 10 to 23 specified categories. This change is a result of [SB 464](#), which Newsom signed into law in October.

Conclusion

We will continue to monitor updates from the CRD on pay data reporting requirements, so make sure you are subscribed to [Fisher Phillips' Insight System](#) to get the most up-to-date information. If you have questions, reach out to your Fisher Phillips attorney, the authors of this Insight, any attorney in our [Pay Equity and Transparency Practice Group](#), or any attorney in [our California offices](#).

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