



Preparing for Federal Civil Rights Enforcement Actions – What Companies Need to Know

Session 2 of *From Risk to Opportunity*, Seyfarth's Series on Legal Insights for Evolving Diversity, Equity and Inclusion Strategies

May 28, 2025

Seyfarth Shaw LLP

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Agenda

01	Background & Legal Landscape
02	EEOC's Jurisdiction & Enforcement Tools
03	DOJ's Jurisdiction & Enforcement Tools
04	Other DEI-Related Enforcement Actions
05	Strategies for Reviewing Internal DEI Practices



Background and Legal Landscape

Multi-Faceted Efforts to Influence Diversity, Equity and Inclusion Activity



The Administration's Whole of Government Approach to Eliminating Illegal DEI



Implications of EO 14173



Section 3: “Terminating Illegal Discrimination in the Federal Government”

- Revokes 1965 EO 11246 that imposed **affirmative action** obligations on federal contractors and subcontractors.
- Imposes **certification** obligations on every contract or grant award to certify compliance with federal anti-discrimination laws.
 - Directs Federal Agencies that every contract or grant award must:

(1) Include recipient’s agreement that “...its compliance in all respects with all applicable Federal anti-discrimination laws is **material** to the government’s payment decisions for purposes of” the federal False Claims Act (“FCA”), and

(2) Require recipient to “...**certify** that it does not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws.”

Implications of EO 14173 for the Private Sector



Section 4: “Encouraging the Private Sector to End Illegal DEI Discrimination and Preferences”

- Directs federal agencies to immediately take “**all appropriate action**” to advance the policy of “individual initiative, excellence, and hard work” in the private sector
- Directs the Attorney General, along with agency heads and the Director of OMB, to provide recommendations for **enforcing Federal civil-rights laws** and taking other appropriate measures to encourage the private sector to end illegal discrimination and preferences, including illegal DEI
- By **May 21, 2025**, the Attorney General must submit a **Strategic Enforcement Plan**:
 - Applies to key sectors of concern within each agency’s jurisdiction
 - Identify the most egregious and discriminatory DEI practitioners in each sector
 - Create a plan to deter illegal DEI programs, which includes each agency identifying up to **nine potential civil compliance investigations** of publicly traded corporations, large non-profit corporations or associations, foundations with assets of \$500M or more, state and local bar and medical associations, and institutions of higher education with endowments over \$1B for **potential civil enforcement action**



EEOC's Jurisdiction & Enforcement Tools

EEOC Leadership and Lack of Quorum

- Early actions by Trump administration
 - Appointments of Commissioner Andrea Lucas as Acting Chair, Andrew Rogers as Acting General Counsel
 - Termination of Democratic Commissioners Charlotte Burrows and Jocelyn Samuels, GC Karla Gilbride
- Impact of actions:
 - With two sitting Commissioners, the EEOC lacks a quorum.
 - Without a quorum, the EEOC cannot:
 - Engage in notice-and-comment rulemaking;
 - Revoke existing formal guidance;
 - File amicus briefs;
 - Initiate certain types of litigation.
 - Routine enforcement and litigation continue.
- Filling vacancies:
 - May 7 nomination of Brittany Bull Panuccio, a current AUSA in Florida, to be a Commissioner
 - Senate confirmation would restore the quorum, but the process typically takes several months or more

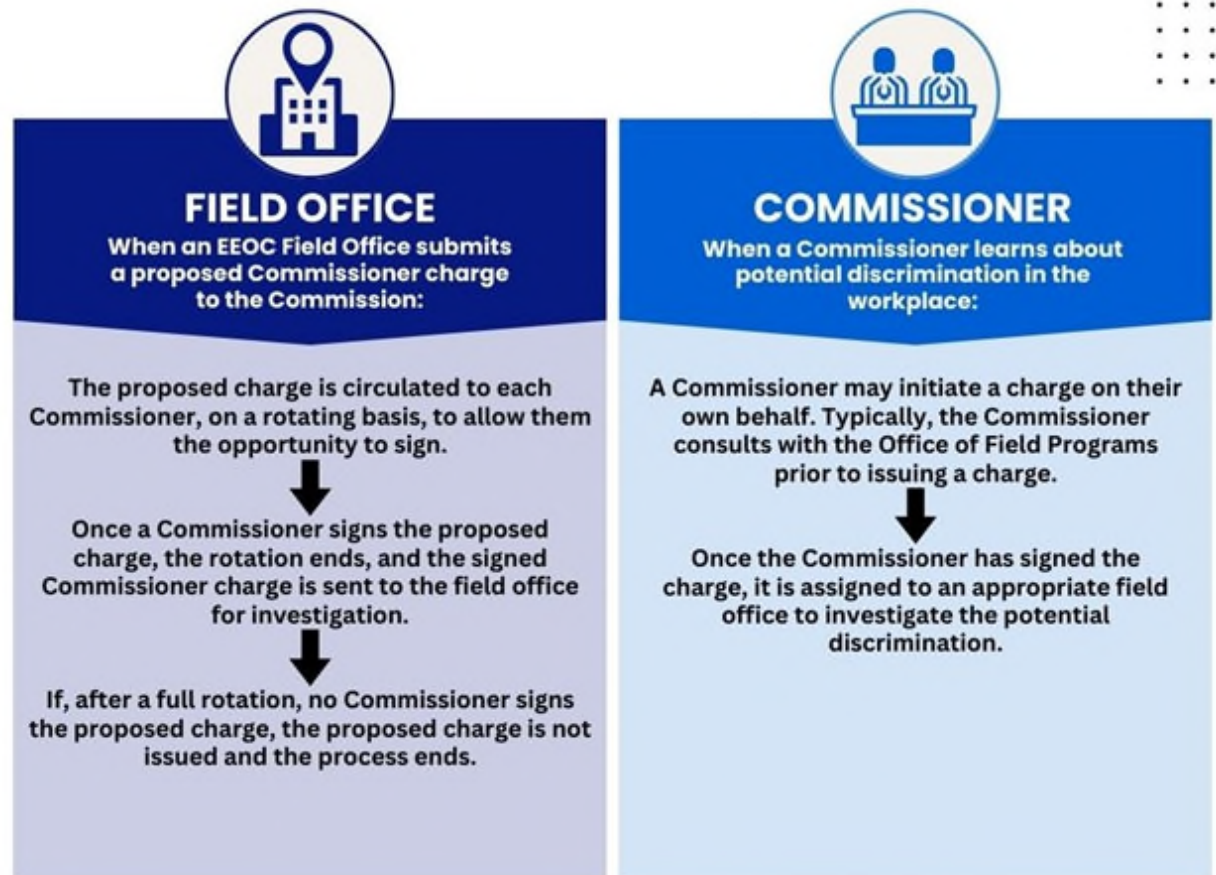
Acting Chair Lucas Supports Trump Administration Priorities

- Aligned prior to appointment as Acting Chair:
 - Commissioner votes
 - Public statements
- As Acting Chair:
 - Immediately revoked prior EEOC technical assistance regarding gender identity and artificial intelligence
 - Announced priority areas, including antisemitism in educational settings; national origin discrimination against American workers; disparate treatment over disparate impact; and rejection of gender identity issues
 - Changed internal processes:
 - Sought dismissal with prejudice of existing EEOC litigation asserting claims based on gender identity
 - Revised gender marker used in charge-intake
 - Modified processing, investigation of some charges?
 - Endorsed federal court order vacating EEOC harassment guidance
 - Issued statement of “First 120 Days” accomplishments

Prerequisites to EEOC Investigation

- EEOC does not have plenary authority to investigate
- A charge is a prerequisite to most* investigations
 - Individual charge
 - Commissioner’s Charge (Title VII, ADA, PWFA, GINA)
- What is a Commissioner’s Charge?
 - Any Commissioner may file a discrimination charge alleging that an employer violated Title VII, the ADA, PWFA, or GINA
 - May be done at the Commissioner’s own initiative, or in response to proposals from an EEOC field office or the public
 - Subject to the same requirements as an individual charge: name of employer, contact name, employer size, and “a clear and concise statement of the facts, including pertinent dates, constituting the alleged unlawful employment practices”
 - Signed by the Commissioner under penalty of perjury
- * Exception to the charge requirement:
 - Directed Investigations, which may be initiated by any field office to look into potential violations of the ADEA or EPA

Processing a Commissioner's Charge



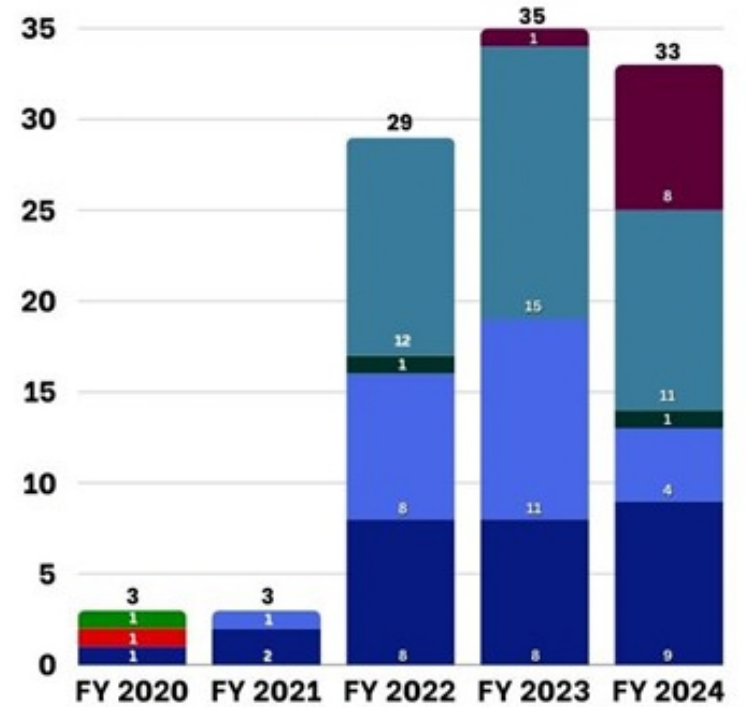
Investigating a Commissioner's Charge

- A charge means the facts warrant investigation; it is not a finding that a violation has occurred
- Mediation is not available
- Investigations are conducted by the field, not the Commissioner, and proceed in the same manner as those for charges submitted by individuals, e.g.:
 - Position statement
 - Requests for information
 - Witness interviews
 - Fact-finding conferences
 - On-site visits
- The assigned field office is still responsible to determine whether a violation has occurred, and to conciliate when a violation is found
- The charging Commissioner is to abstain from making the determination
- Investigation and non-litigation outcomes are confidential by statute

Frequency of Commissioner's Charges

COMMISSIONER CHARGES FILED

FY 2020 – FY 2024



Charge v. Letter



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, D.C.

Office of the Chair
Andrea R. Lucas, Acting Chair

COMMISSIONER'S CHARGE

Pursuant to authority contained in Title VII of the Civil Rights Act of 1964, as amended (Title VII), I issue this Commissioner's Charge against the following employer:

I, Andrea R. Lucas, Acting Chair of the Equal Employment Opportunity Commission, declare under penalty of perjury that I have cause to believe the foregoing is, to the best of my knowledge and belief, true and correct.

Executed on this [REDACTED]

Andrea R. Lucas, Acting Chair
U.S. Equal Employment Opportunity
Commission



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, D.C.

Office of the Chair
Andrea R. Lucas, Acting Chair

March 17, 2025

Via Electronic Mail



Re: Review of [REDACTED] Compliance with Title VII of the Civil Rights Act of 1964

Dear [REDACTED]

Please submit your responses and any supporting documentation by **April 15, 2025**, to lawfirmDEI@eeoc.gov. If certain information is unavailable or requires additional time to compile, please indicate this in your response and provide an estimated timeline for submission.

Thank you in advance for your cooperation.

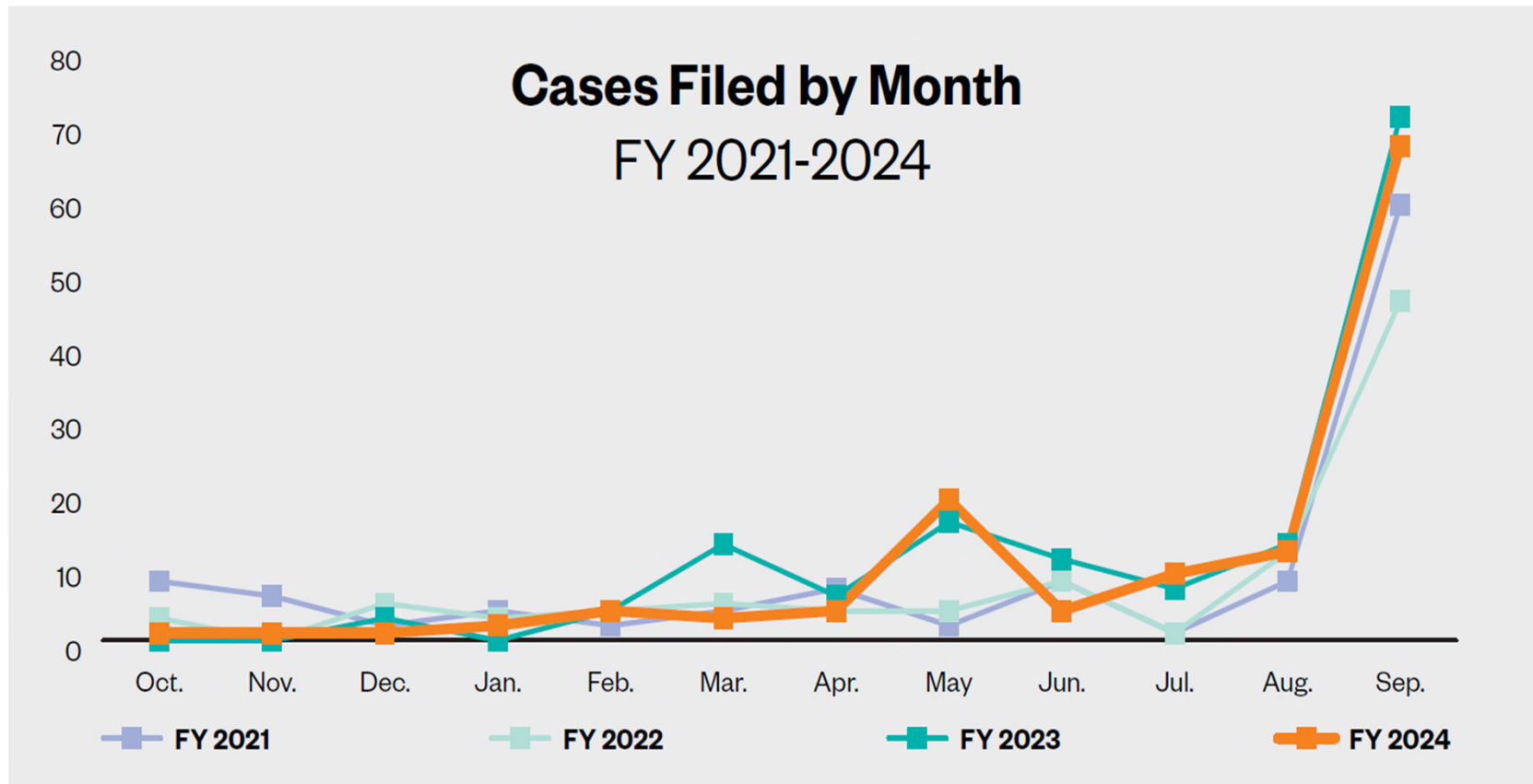
Sincerely,

Andrea R. Lucas
Acting Chair
U.S. Equal Employment Opportunity Commission

EEOC-initiated litigation

- Existing delegation of authority to the GC when there is no quorum of Commissioners
 - EEOC may file routine cases
 - EEOC may not file cases involving:
 - Allegations of systemic discrimination
 - Allegations of pattern or practice discrimination
 - Major expenditures of agency resources, including staffing and staff time, or expenses associated with extensive discovery or expert witnesses
 - Positions contrary to precedent in the Circuit in which the case will be filed
 - Other cases reasonably believed to be appropriate for approval by the Commission, e.g., cases that implicate areas of the law that are not settled and cases that are likely to generate public controversy
- Too early to read the tea leaves

EEOC Litigation By The Numbers: Too early to read tea leaves



EEOC Strategic Enforcement Priorities FY 2024-2028

1

Eliminating Barriers In Recruitment and Hiring: The EEOC will focus on recruitment and hiring practices and policies that discriminate on any basis unlawful under the statutes EEOC enforces, including sex, race, national origin, color, religion, age, and disability.

2

Protecting Vulnerable Workers: The EEOC will focus on harassment, retaliation, job segregation, labor trafficking, discriminatory pay, disparate working conditions, and other policies and practices that impact particularly vulnerable workers and persons from underserved communities.

3

Addressing Selected Emerging And Developing Issues: The EEOC will continue to prioritize issues that may be emerging or developing, including issues that involve new or developing legal concepts or topics that are difficult or complex.

4

Advancing Equal Pay For All Workers: The EEOC will continue to focus on combatting pay discrimination in all its forms—on the basis of sex under the Equal Pay Act and Title VII, on other protected bases covered by federal anti-discrimination laws, including race, national origin, disability, and age, and at the intersection of protected bases.

5

Preserving Access to the Legal System: The EEOC will focus on policies and practices that limit substantive rights, discourage or prohibit individuals from exercising their rights under employment discrimination statutes, or impede the EEOC's investigative or enforcement efforts.

6

Preventing and Remedying Systemic Harassment: The EEOC will continue to focus on combatting systemic harassment in all forms and on all bases—including sexual harassment and harassment based on race, disability, age, national origin, religion, color, sex (including pregnancy, gender identity, and sexual orientation) or a combination or intersection of any of these. A claim by an individual or small group may fall within this priority if it is related to a widespread pattern or practice of harassment.

EEOC Litigation – Emerging Issues

- **Ongoing and non-controversial**
 - ADA focus
 - Mental health related conditions
 - Hearing impairment.
- **On-going, but different interpretations**
 - Pregnancy accommodations and PWFA guidelines
 - Interplay with EO on sex and gender
 - Religious discrimination and accommodations
 - National origin discrimination
 - Focus on protection of American workers



DOJ, HHS and Department of Education

DOJ's Authority Under Federal Civil Rights Statutes

- Department of Justice Civil Rights Division is responsible for conducting, handling or supervising the enforcement of all federal statutes affecting civil rights, including those pertaining **employment**, and the authorization of litigation in such enforcement, including criminal prosecutions and civil actions and proceedings on behalf of the federal government and appellate proceedings in all such cases. 28 C.F.R. § 0.50
- The DOJ shares **enforcement authority** under Title VII with the EEOC:
 - DOJ has authority to seek to remedy employment discrimination by state and local governments and their agencies and political subdivisions;
 - EEOC has authority to seek to remedy employment discrimination by private employers;
 - EEOC also has primary enforcement responsibility with respect to allegations of discrimination by the federal government;
 - Assistant Attorney General for the Civil Rights Division retains final authority to determine whether a civil rights investigation should be opened



DOJ's Authority Under Federal Civil Rights Statutes

- While the DOJ does not have authority to enforce Title VII against private employers—that authority resides with the EEOC—the DOJ still has the authority to launch an investigation into a private employers DEI practices.
- DOJ may use tools such as an administrative summons, subpoenas or formal and informal written requests for records to obtain information from employers and use that information to encourage the EEOC to take action against private employers.
- DOJ may also file amicus briefs in civil actions brought by the EEOC or individual plaintiffs criticizing DEI initiatives of private employers.

DOJ's Civil Rights Fraud Initiative

- Announced on May 19, 2025, DOJ will leverage the federal False Claims Act to investigate and litigate against entities that accept federal funds for alleged violations of the federal civil rights laws.
- Initiative will be led jointly by the DOJ's Civil Division's Fraud Section and the Civil Rights Division.
- The FCA is the DOJ's "primary weapon against government fraud, waste, and abuse. . . It is implicated when a federal contractor or recipient of federal funds knowingly violates civil rights laws—including . . . Title IV, Title VI, and Title IX of the Civil Rights Act of 1964—and falsely certifies compliance with such laws."
- The FCA is "implicated whenever federal-funding recipients or contractors certify compliance with civil rights laws while knowingly engaging in racist preferences, mandates, policies, programs, and activities, including through diversity, equity, and inclusion (DEI) programs that assign benefits or burdens on race ethnicity or national origin."
- "[M]any corporations and schools continue to adhere to racist policies and preferences—albeit camouflaged with cosmetic changes that disguise their discriminatory nature."

DOJ's Civil Rights Fraud Initiative

- The Initiative will utilize the FCA to investigate and pursue claims against any recipient of federal funds that knowingly violates federal civil rights laws.
- DOJ has signaled it will rely on the FCA's "false certification" theory of liability:
 - When a funding recipient expressly or implicitly certifies compliance with statutes such as Title VI or Title IX of the Civil Rights Act of 1964 to obtain payment;
 - Any knowing violation that is material to the government's decision to pay can trigger treble damages and statutory penalties under the FCA.
- Each of the 93 U.S. Attorney's Offices will identify an AUSA to advance the efforts of this Initiative.
- Civil Fraud Section and Civil Rights Division will also engage with the Criminal Division, as well as other federal agencies that enforce civil rights requirements for federal funding recipients.
- Encourages private litigants to file lawsuits under the FCA or report discrimination to the appropriate federal authorities.

Elements of False Claims Act

- The False Claims Act prohibits individuals or entities from submitting inaccurate claims to a government payer.
- The government must prove four key elements to find someone civilly or criminally liable:
 - Falsity
 - Objective
 - Subjective
 - Knowledge
 - Actual
 - Deliberate Ignorance
 - Recklessness
 - Materiality
 - Causality
- Damages under the Federal Claim Act is three times the government's damages plus a penalty

False Certification Theory of Liability

- Traditional liability arises under the FCA when the government pays for products or services that a company knows, or is reckless in not knowing, are defective.
- False certification liability, by contrast, arises when a company fails to comply with ancillary requirements, such as contractual provisions, statutes and regulations.
- A false certification can be either:
 - An express false certification. This occurs when a company that submits a claim has expressly certified compliance with ancillary legal requirements, either accompanying the invoice for payment or at some other point.
 - An implied false certification. This is based on the theory that a company implicitly certifies that it has complied with the relevant ancillary requirements each time it submits an invoice to the government for any work performed or product delivered, even if no express certification of compliance has been made.

Potential Criminal Exposure

- While most violations of the FCA are penalized by civil fines, criminal charges are possible pursuant to 18 U.S.C. § 287:
 - imposes criminal liability for any person, business, or contractor who knowingly submits, or causes to be submitted, a false or fraudulent claim when the intent is to receive payment from the federal government.
- For entities without a nexus to federal funds, a potential vehicle for criminal enforcement is 18 U.S.C. § 241:
 - it is unlawful for “two or more persons to agree to injure, threaten, or intimidate a person in the United States in the free exercise or enjoyment of any right or privilege secured by the Constitution or laws of the United States.”
 - Unprecedented use of the statute
 - Novel theory of criminal liability
 - Multiple defenses likely apply

Agency Authority for Enforcing Civil Rights Statutes

U.S. Department of Education Office for Civil Rights ("OCR")

- Enforces federal civil rights laws in schools and other recipients of Department of Education federal funding throughout the nation
- OCR has authority to evaluate and investigate claims of discrimination based on race, color, national origin, sex, disability or age against institutions that receive federal financial assistance from the Department and institutions for which OCR has been delegated authority from other federal agencies. This includes:
 - public elementary and secondary education systems and institutions;
 - public institutions of higher education and vocational education (other than schools of medicine, dentistry, nursing, and other health-related schools); and
 - public libraries.

Agency Authority for Enforcing Civil Rights Statutes

U.S. Department of Education Office for Civil Rights ("OCR")

- OCR can open an investigation based on complaints it receives;
- OCR issues a letter of notification to the complainant and the entity alleged to have engaged in the wrongful conduct;
- Notification contains, among other things, OCR's jurisdiction with applicable statutory and regulatory citations and the allegations to be investigated;
- OCR conducts investigation by collecting documents, data and information through document requests, interviews and data gathering;
- OCR can resolve the matter anytime prior to the issuance of a final determination through a Resolution Agreement;
- If no resolution is reached, OCR issues a determination;
- In the event that no resolution is reached, OCR can either bring an administrative proceeding or refer the matter to the DOJ to bring a civil action.

Agency Authority for Enforcing Civil Rights Statutes

U.S. Department of Health and Human Services Office for Civil Rights (“HHS OCR”)

- HHS OCR is responsible for enforcing civil rights laws that apply to recipients of federal financial assistance from the U.S. Department of Health and Human Services (“HHS”).
 - Compliance Reviews
 - Investigation of Complaints
- Entities that are recipients of federal financial assistance from HHS (“Covered Entity”) are required by law to cooperate with HHS OCR investigations.
- HHS OCR conducts its investigation and determines whether the Covered Entity was not in compliance with the law.
- HHS OCR will attempt to resolve the case by obtaining corrective action through a voluntary agreement with the Covered Entity.
- OCR will notify the complainant and the covered entity of the result of the investigation.
- If the Covered Entity does not take voluntary action to resolve the matter in a way that is satisfactory, HHS OCR will issue a Letter of Findings that describes how the covered entity is not in compliance and identifies next steps:
 - Referral to the Department of Justice for enforcement action;
 - Steps to terminate federal financial assistance to the covered entity;
 - Other actions.



Proactive Strategies for Reviewing Internal DEI Practices

What Is Illegal DEI?

Federal Agency Actions Implementing EOs:

- Attorney General Bondi Memoranda
 - “Ending Illegal DEI and DEIA Discrimination and Preferences” and “Eliminating Internal Discriminatory Practices” (February 5, 2025)
- Acting Office of Personnel Management Director Ezell Memoranda
 - “Initial Guidance Regarding DEIA Executive Orders” (January 21, 2025) and “Further Guidance Regarding Ending DEIA Offices, Programs and Initiatives” (February 5, 2025)
- Department of Education
 - FAQ about Racial Preferences and Stereotypes Under Title VI (February 28, 2025)

Acting Chair of EEOC Lucas Technical Assistance Documents

- “What To Do If You Experience Discrimination Related to DEI At Work” (one-pager jointly issued with DOJ) and “What You Should Know About DEI-Related Discrimination at Work” (Q&A document) (March 19, 2025)

Guidance

- **Multi-State Guidance Concerning Diversity, Equity, Inclusion, and Accessibility Employment Initiatives** (February 13, 2025)
 - Issued by 16 State Attorneys General
 - MA, IL, AZ, CA, CT, DE, HI, ME, MD, MN, NV, NJ, NY, OR, RI, and VT

Applicable State Law Compliance

- Consider Jurisdiction-Specific EEO Requirements

EEOC Technical Assistance on DEI-Related Workplace Discrimination



WHAT TO DO IF YOU EXPERIENCE DISCRIMINATION RELATED TO DEI AT WORK



Title VII of the Civil Rights Act of 1964 prohibits employment discrimination based on protected characteristics such as race and sex. Different treatment based on race, sex, or another protected characteristic can be unlawful discrimination, no matter which employees are harmed. Title VII's protections apply equally to all racial, ethnic, and national origin groups, as well as both sexes.

Before you can sue in federal court, you first must file a charge of discrimination with the EEOC. The U.S. Equal Employment Opportunity Commission (EEOC) investigates charges of discrimination and can file a lawsuit under Title VII against businesses and other private sector employers. The Department of Justice can file a lawsuit under Title VII against state and local government employers based on an EEOC charge, following an EEOC investigation.

What can DEI-related discrimination look like?

Diversity, Equity, and Inclusion (DEI) is a broad term that is not defined in the statute. Under Title VII, DEI policies, programs, or practices may be unlawful if they involve an employer or other covered entity taking an employment action motivated—in whole or in part—by an employee's race, sex, or another protected characteristic. In addition to unlawfully using quotas or otherwise "balancing" a workforce by race, sex, or other protected traits, DEI-related discrimination in your workplace might include the following:

Disparate Treatment

DEI-related discrimination can include an employer taking an employment action motivated (in whole or in part) by race, sex, or another protected characteristic. Title VII bars discrimination against applicants or employees in the terms, conditions, or privileges of employment, including:

- Hiring
- Firing
- Promotion
- Demotion
- Compensation
- Fringe benefits
- Exclusion from training
- Exclusion from mentoring or sponsorship programs
- Exclusion from fellowships
- Selection for interviews (including placement on candidate slates)

Harassment

Title VII prohibits workplace harassment, which may occur when an employee is subjected to unwelcome remarks or conduct based on race, sex, or other protected characteristics. Harassment is illegal when it results in an adverse change to a term, condition, or privilege of employment, or it is so frequent or severe that a reasonable person would consider it intimidating, hostile, or abusive. Depending on the facts, DEI training may give rise to a colorable hostile work environment claim.

Who can be affected by DEI-related discrimination?

Title VII protects employees, potential and actual applicants, interns, and training program participants.

What should I do if I encounter discrimination related to DEI at work?

If you suspect you have experienced DEI-related discrimination, contact the EEOC promptly because there are strict time limits for filing a charge. The EEOC office nearest to you can be reached by phone at 1-800-669-4000 or by ASL videophone at 1-844-234-5122.



www.EEOC.gov

Limiting, Segregating, and Classifying

Title VII also prohibits employers from limiting, segregating, or classifying employees based on race, sex, or other protected characteristics in a way that affects their status or deprives them of employment opportunities. Prohibited conduct may include:

- Limiting membership in workplace groups, such as Employee Resource Groups (ERGs) or other employee affinity groups, to certain protected groups
- Separating employees into groups based on race, sex, or another protected characteristic when administering DEI or other trainings, or other privileges of employment, even if the separate groups receive the same programming content or amount of employer resources

Retaliation

Title VII prohibits retaliation by an employer because an individual has engaged in protected activity under the statute, such as objecting to or opposing employment discrimination related to DEI, participating in employer or EEOC investigations, or filing an EEOC charge. Reasonable opposition to a DEI training may constitute protected activity if the employee provides a fact-specific basis for his or her belief that the training violates Title VII.

Two Technical Assistance Documents: (1) One-pager issued jointly with the Department of Justice and (2) Q&A guidance document issued solely by the EEOC (March 19, 2025)

- Encourages employees to file charges with the EEOC if they believe they have experienced DEI-related discrimination.

EEOC provided examples of DEI practices that may violate Title VII:

- Diverse interview slates that require a minimum representation of candidates from specific demographic groups or disclosure of pre-employment information about any protected characteristic if used in the selection decision.
- Employee resource groups (ERGs), or similar programs, including employee affinity groups, that restrict membership to certain protected groups.
- Training, programming, leadership development programs, or other privileges of employment that separate workers into groups based on any protected characteristic.
- Access to (or exclusion from) mentorship, sponsorship, workplace networks/networking opportunities, internships, fellowships, summer associate programs, or work assignments that are restricted according to any protected characteristic.

What is Illegal DEI: Relevant Evaluation Questions

Key Civil Rights Laws:

- Employment
- Education and Federally Funded Programs
- Housing and Public Accommodations
- Contracts
- Other federal and/or state and local laws prohibit discrimination on other grounds, including disability, pregnancy, gender identity, marital status and myriad other bases.

Based on existing law, federal agency memoranda, guidance, and litigation developments, the key relevant evaluation questions start with:

1. Does the program, action, initiative include consideration, preference, exclude or divide on the bases of a protected characteristic?

2. Does the program, action, initiative:
a) confer some harm or benefit
b) impair a contractual right, benefit or opportunity

Proactive Strategies to Strengthen Commitments to EEO and Inclusion



- Conduct an attorney-client privileged detailed, program-by-program deep-dive analysis to properly assess legal compliance and risks
 - Focus on ALL potential DEI related policies and practices – employment, procurement, third-party partnerships, operational “equity” considerations
 - Confirm protected characteristics do not influence employment, benefits or opportunities, such as attendance at outside seminars and events, compensation, and client and customer assignments.
 - Consider privilege issues
- If a program arguably violates the law – stop the program, reframe, consider the underlying objectives and reshape the strategy
- Document lawful, objective business cases for initiatives
- Account for additional state and local legal requirements
- Define imprecise terms like “diversity,” “equity,” “inclusion,” and “DEI” to prevent misinterpretation
- Ensure training materials avoid mandated viewpoints or personal attacks.
- Verify public-facing EEO commitments comply with legal standards

Closing Thoughts

- Key Takeaway: Identify, Evaluate, & Evolve
- Stay abreast of the fast pace of legal developments across a wide spectrum to ensure legal compliance, effectiveness, and awareness of developing policies and priorities
- Consider all aspects of risk – beyond the legal are the reputational and other stakeholder risks
- Diversity, Equity and Inclusion concepts remain legal and are important business objectives
- Ensure your programs do not run afoul of legal constraints

Join Us for the Upcoming Sessions in Our Series

From Risk to Opportunity

- Enforcement Risks for DEI Programs: What Government Contractors and Private Employers Need to Know – *March 12, 2025*
- Preparing for Federal Civil Rights Enforcement Actions – What Companies Need to Know – *today!*

Upcoming Topics to Include:

- Procurement and Supplier Diversity
- Cause-Based Investments and Community Based Giving
- Healthcare Equity



CLE: NEW PROCESS

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You will need:

1. **Title:** Preparing for Federal Civil Rights Enforcement Actions – What Employers Need to Know
2. **Date Viewed:** May 28, 2025
3. **Attendance Verification Code:** SS_____

State-specific CLE credit information can be found in the form.



**thank
you**

For more information, please contact:

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