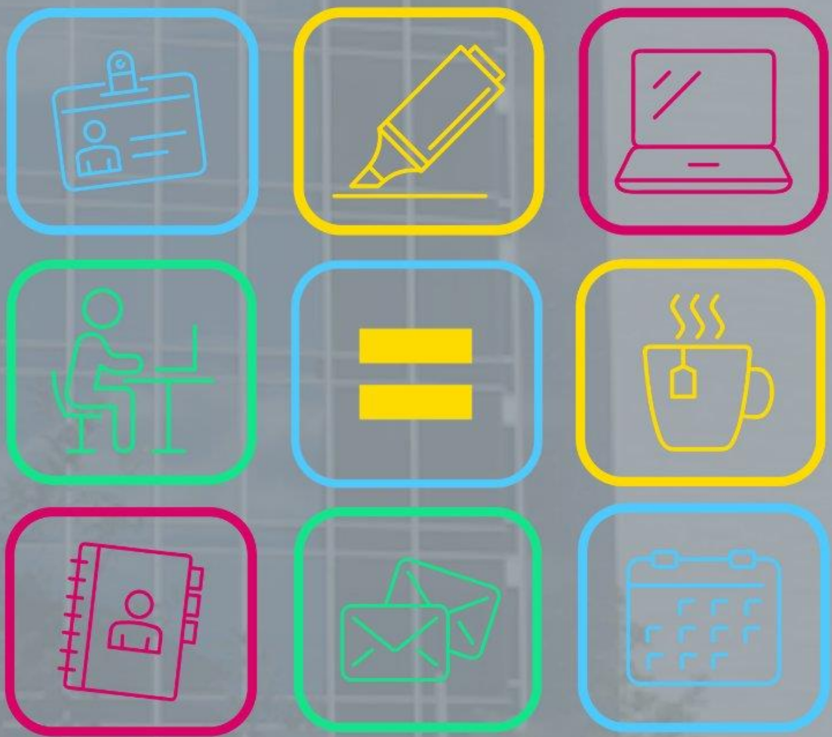
2026 Corporate Equality Index Resource Guide

The CEI Resource Guide is a comprehensive instructional and reference accompaniment to the Corporate Equality Index (CEI) Survey. The CEI Resource Guide covers all of the sections of the CEI survey in great detail, providing explanations of why these policies and practices we ask about are important, example policies, links to outside resources, and more.



workplace equality program

HUMAN RIGHTS CAMPAIGN FOUNDATION

Table of Contents

Introduction and Useful Resources 3
Rating Criteria for the 2026 CEI 4
Criterion 1: Workforce Protections 5
Employment Non-Discrimination (Criterion 1) 5
Overview 5
Non-Discrimination Scored Questions 6
Criterion 2: Inclusive Benefits 7
Inclusive Benefits (Criteria 2a and b) 7
Overview 7
Spousal and Domestic Partner Benefits Scored Questions 8
Family Formation Benefits Scored Questions 13
Comprehensive Health Benefits (Criterion 2c) 14
Overview 14
Healthcare Scored Questions 14
Comprehensive Health Benefits Guide (Criterion 2d) 18
Overview 18
Comprehensive Health Benefits Guide Score Questions 19
Criterion 3: Supporting an Inclusive Culture 20
Workforce Training and Accountability (Criterion 3a) 20
Overview 20
Workforce Training and Accountability Scored Questions 21
Inclusive Culture Best Practices (3b through d) 22
Overview 22
Workforce Data Collection Scored Questions 22
Inclusion Best Practices Scored Questions 24
Employee Group/Diversity Council Scored Questions 25
Criterion 4: Outreach and Engagement 27
Outreach and Engagement Efforts (Criterion 4a) 27

Overview 27
Outreach and Engagement Scored Questions 28
External Partnerships & Business Practices (Criterion 4b) 28
Overview 28
External Partnerships & Business Practices Scored Questions 29

Introduction and Useful Resources

The resources provided here are certainly not the only ones available to help your company create a workplace that is inclusive of LGBTQ+ employees; however, we hope they can help you get started on implementing best practices in workplace equality. The CEI Resource Guide is also designed to help employers better understand what is required to receive credit for each question as part of the CEI scoring criteria.

We hope you find the CEI Resource Guide helpful in taking steps to ensure your company has the necessary workplace policies, practices, and benefits foundational to an inclusive and welcoming environment for LGBTQ+ workers. If you have any further questions about the CEI, please do not hesitate to contact our team at cei@hrc.org.

Helpful Links:

CEI 2026 Questions Requirements Grid Download

CEI 2026 Scoring Criteria Download

Tip Sheet: Navigating the CEI Survey

How to Replace an Uploaded File

CEI Myths vs. Facts Link

Rating Criteria for the 2026 CEI

1) **Workforce Protections**
   a) Policy includes sexual orientation and gender identity/gender identity or expression for all operations
2) **Inclusive Benefits**
   a) Equivalency in same- and different-sex spousal and domestic partner medical and soft benefits
   b) Equivalency in spousal and domestic partner family formation benefits regardless of sex
   c) Comprehensive health coverage for all employees (including transgender employees) without exclusion for medically necessary care
   d) Comprehensive health benefits guide
3) **Supporting an Inclusive Culture**
   a) Workforce Training and Accountability
   b) Workforce Data Collection
   c) Inclusion Best Practices
   d) Employee Group –OR– Diversity Council
4) **Outreach and Engagement**
   a) Outreach and engagement
   b) External partnerships and business practices

Criterion 1: Workforce Protections

The questions for this criterion refer to your company's Equal Employment Opportunity (EEO) or non-discrimination policy. This section will cover key questions that must be met in order to receive the 5 points allotted.

Employment Non-Discrimination (Criterion 1)

Overview

Why an LGBTQ+ Inclusive Employment Non-Discrimination Policy?

The HRC Foundation (HRCF) seeks a clear declaration of non-discrimination toward LGBTQ+ employees by including both "sexual orientation" and "gender identity or expression" in an employer's primary non-discrimination or EEO statement. HRCF does not view anti-harassment or other corporate statements alone as a sufficiently inclusive policy of non-discrimination towards employees and job applicants.

An employment non-discrimination policy that explicitly bans discrimination on the basis of "sexual orientation" and "gender identity" ensures equal treatment for LGBTQ+ employees and also sends a welcoming message to LGBTQ+ job applicants, helping employers retain and recruit a diverse, talented staff.

In areas without a state law explicitly prohibiting LGBTQ+ discrimination, adding "sexual orientation" and "gender identity" to a non-discrimination policy affirms an employer's commitment to workplace equity and inclusion.

Please note that the recommended term is "gender identity or expression." Although a person's gender expression, or external expression of gender, differs from their gender identity, or internal sense of gender, in law and policy, the term "gender identity" is often defined or at least understood to include an individual's gender expression. To ensure that expectations are clearly communicated to employees and potential applicants, we recommend that employers use the term "gender identity or expression" in policies and other communications.

To receive credit in CEI Criterion 1 (5 points):

- Criterion 1: Employer must submit an official non-discrimination or EEO policy that includes "sexual orientation" AND "gender identity" or "gender identity or expression" for all operations (5 points)

Note on "All operations": For those companies with locations outside of the United States (with 100 employees), the non-discrimination policy must also extend to those global *operations. Companies without LGBTQ+ inclusive non-discrimination policies for existing global operations will not earn credit in this section. This does not apply to US-only operations.*

Non-Discrimination Scored Questions

Does your employment non-discrimination policy (or the Equal Employment Opportunity statement), which includes a listing of protected classes, include the terms "sexual orientation" and "gender identity or expression" (or "gender identity")?

To receive credit in the CEI, a company must:

Answer "yes."

Upload a copy of the company's official non-discrimination or equal employment opportunity policy. (You will only need to upload this document once.)

More information:

Visit our Workplace Discrimination Laws and Policies page to learn more about inclusive non-discrimination policies.

Examples:

Check our resource for Sample EEO/Non-discrimination policies. This provides sample policies from CEI-rated companies.

Note: In order to receive credit, the policy must include "sexual orientation" and "gender identity" or "gender identity or expression."

Does your primary non-discrimination policy apply to all employees globally? (Note: This only applies to companies with global operations)

To receive credit in the CEI, a company must:

- Answer "yes" to this question.
- OR have another codified policy that prohibits discrimination on the basis of "sexual orientation" and "gender identity" or "gender identity or expression."

Note: In order to receive credit, the policy must include "sexual orientation" and "gender identity" or "gender identity or expression."

Criterion 2: Inclusive Benefits

The questions for this criterion all relate to best practices in LGBTQ+ LGBTQ+ inclusive benefits. The scored questions for this criterion come from the following sections of questions from the Corporate Equality Index Survey.

This criterion is divided into three scored subsections:

- The first subsection consists of domestic partner benefits and inclusive family formation benefits. Your company can receive either full (10 points) or partial (5 points) credit per section, depending upon the level of parity in the benefits.
- The second subsection is related to the provision of comprehensive healthcare benefits for all of your employees and is worth 25 points. Partial credit (10 points) is possible for companies that have not eliminated broad exclusions from all other benefit plans.
- The third subsection is the comprehensive health benefits guide requirement, worth 5 points. The guide should include information on domestic partner benefit eligibility, family formation benefits, transition care, and coverage of HIV/AIDS care.

Inclusive Benefits (Criteria 2a and b)

Overview

Why cover domestic partners?

Since the 2015 U.S. Supreme Court decision in Obergefell v. Hodges, which brought marriage equality nationwide by ruling that marriage is a fundamental right to which same-sex couples should have the same access as opposite-sex couples, employers have sought to do the right thing in the name of equality and provide spousal benefits to both same- and different-sex married couples. Many employers assumed that the marriage ruling obviated the need for partner benefits; however, this is not true. While marriage equality is undoubtedly a monumental step toward full equality, LGBTQ+ individuals remain at risk for discrimination in many other aspects of daily life, and these vulnerabilities continue to create barriers for many LGBTQ+ Americans to exercise their legal right to marry.

In the absence of sexual orientation and gender identity protections through federal and consistent state law, LGBTQ+ individuals remain vulnerable to discrimination in housing, access to public places, federal funding, credit, education, jury service, and, in some cases, employment (for employees not covered under Title VII). While LGBTQ+ Americans can get legally married, this lack of guaranteed protection in other domains means that a newly married LGBTQ+ couple is at risk for eviction from their home by a discriminatory landlord who sees their wedding photos on social media. Until LGBTQ+ Americans have full equality through the federal Equality Act, domestic partner benefits will remain an essential CEI standard that helps to fill the void left by federal and state law and ensure LGBTQ+ workers and their families receive equitable benefits whether married or partnered.

Domestic partner benefits do not only serve same-sex couples. In fact, over the last decade, most businesses that have offered same-sex partner benefits also extended these to partners. In other words, businesses have increasingly recognized the value of decoupling benefits from the legal definition of marriage to meet the needs of their diverse workforces.

Competitive employer-provided benefits packages are critical to attracting and retaining talent. From healthcare coverage to retirement investments and more, ensuring LGBTQ+ inclusive benefits to employees and their families is an overall low-cost, high-return proposition for businesses. In addition, equitable benefits structures align with the principle of equal compensation for equal work. Apart from actual wages paid, benefits account, on average, for approximately 30 percent of employees' overall compensation. Therefore, employers should ensure that this valuable bundle of benefits is equitably extended to their workforce, irrespective of sexual orientation and gender identity. When denied equal benefits coverage, the cost to LGBTQ+ workers and their families is profound.

To receive credit in Criteria 2a and b (20 points), a company must have the following:

- Equivalency in same- and different-sex spousal medical and soft benefits (0 points)
- Equivalency in same- and different-sex domestic partner medical and soft benefits (10 points)
- Equivalency in spousal and domestic partner family formation benefits regardless of sex (10 points)

Spousal and Domestic Partner Benefits Scored Questions

Does your business offer benefits to same and different-sex domestic partners of benefits-eligible U.S. employees?

To receive credit in the CEI, a company must:

Upload summary plan documentation of health insurance coverage with eligibility that clearly indicates unmarried domestic partners are eligible for healthcare benefits.

More information:

Learn more about why HRC strongly recommends the continued provision of domestic partner benefits. See our white paper on this topic for more information.

Unmarried partners of employees are sometimes eligible for coverage under "Plus-One" (also "Other Qualified Adult," or "Legally Domiciled Adult") status. In these cases, employers have made benefits available to an adult living with the employee, regardless of marital status or gender, although other limitations may exist depending on the employer. If this is something your company has done, you can indicate this in the survey.

Examples:

Micron's U.S. Benefits Guide

Sony Pictures Entertainment's Benefits Guide

Note: You will upload one document for spousal and domestic partner eligibility.

Does your insurance plan require proof of relationship documentation to enroll an eligible dependent?

To receive credit in the CEI, a company must:

Answer "yes" or "no" to this question.

If you answer "yes," indicate which documents are required for same- and different-sex spouses as well as same- and different-sex domestic partners.

If applicable, upload a copy of your company's domestic partner affidavit.

More information

If an employer requires proof of eligibility of family members and would also require proof of eligibility of same-sex partners, the employer should allow any of the following:

- Partnership affidavit (as defined by the employer/insurer)
- Municipal domestic partnership registration
- State domestic partnership registration
- State civil union license
- State marriage license

- Marriage licenses issued in other countries

Examples:

Blue Cross and Blue Shield of Massachusetts Affidavit of Domestic Partnership

Note: HRCF cannot accept plans that require state registration for proof of domestic partnership. Given that affidavits provide a clear process for couples to attest to their relationship status, requiring state-registered partnerships is unnecessary. Your insurer likely has a standard affidavit that can be used.

Select the health benefits offered to dependents of benefits-eligible U.S. employees' firm-wide:

To receive credit for spousal and domestic partner benefits in the CEI, a company must:

Offer the following standard health benefits:

- Health
- Dental
- Vision
- Dependent health
- COBRA/"COBRA-like" coverage

Note: A company cannot earn any credit for domestic partner benefits if the benefits listed above are not covered, as they represent minimum standard medical coverage.

Select the following soft benefits offered to spouses and/or partners of benefits-eligible U.S. employees firm-wide:

To receive credit for spousal and domestic partner benefits in the CEI, a company must:

Offer soft benefits equally to spouses and domestic partners regardless of sex.

Upload a copy of the applicable policy or benefit.

If a benefit is simply not offered, a company can select "Benefit not offered" without consequence. Partial benefits (i.e., those offered to spouses and not partners) will result in partial credit (5 points).

Soft benefits include:

- FMLA/"FMLA-like" equivalent benefit

Policy allows employees to take unpaid, job-protected family and medical leave to care for domestic partners as well as the children of a domestic partner.

Visit our page on the Family and Medical Leave Act: FMLA-Equivalent Benefit for Domestic Partners to learn more about making an inclusive family and medical leave policy equivalent.

- Bereavement leave benefit

Includes the event of the death of a domestic partner or the partner's immediate family. **Examples of these policies include:**

Petsmart's bereavement policy names domestic partners as eligible family members of employees for them to take bereavement leave.

Macy's includes domestic partners as family members for whom employees may take bereavement leave.

Sample Bereavement Leave Policy from the Society for Human Resource Management (SHRM).

- Employer-offered supplemental life insurance
- Relocation/travel assistance
- Employee discounts
- Employee assistance program

Please indicate below which beneficiaries are eligible to receive survivor benefits offered to benefits-eligible U.S. employees. For the following benefits, please answer based on those benefits currently available to all new hires.

To receive credit for spousal and domestic partner benefits in the CEI, a company must:

Offer survivor benefits equally to spouses and domestic partners regardless of sex. If a benefit is simply not offered, a company can select "Benefit not offered" without consequence. Partial benefits (i.e., those offered to spouses and not partners) will result in partial credit (5 points). Survivor benefits include:

- QJSA/QJSA-equivalent

- QPSA/QPSA-equivalent
- Cash-balance plans

More information:

Visit our page on Domestic Partner Benefits: Pension Survivor Annuities to learn more about making these benefits available to domestic partners of eligible employees.

Note: When answering questions about retirement and survivor benefits, please focus only on the options currently available to all new hires. Do not include any benefits from closed, discontinued, or 'grandfathered' plans. (Tip: Most pension plans are now closed to new employees.)"

Please indicate below which beneficiaries are eligible to access the following retirement benefit options. For the following benefits, please answer based upon those benefits that are currently available to all new hires (i.e., not based upon closed or "grandfathered" plans).

To receive credit for spousal and domestic partner benefits in the CEI, a company must:

Offer retirement benefit options equally to spouses and domestic partners regardless of sex. If a benefit is simply not offered, a company can select "Benefit not offered" without consequence. Partial benefits (i.e., those offered to spouses and not partners) will result in partial credit (5 points). Retirement benefit options include:

- Hardship distribution
- Rollover distribution

More information:

Visit our page on Domestic Partner Benefits: Hardship Withdrawal Option for Retirement to learn more about making these benefits available to the domestic partners of eligible employees.

Visit our page on Domestic Partner Benefits: Nonspouse Rollover Provision for Retirement Plans to learn more.

*Note: For retirement and survivor benefits, please **only** answer based upon those benefits that are currently available options to all new hires (i.e., not based upon closed, canceled, or "grandfathered" plans).*

Family Formation Benefits Scored Questions

Select the family formation benefits offered to spouses and partners of benefits-eligible U.S. employees firm-wide.

To receive credit for spousal and domestic partner benefits in the CEI, a company must:

Offer family formation benefits equally to spouses and domestic partners regardless of sex. If a certain family formation benefit is simply not offered, a company can select “Benefit not offered” without consequence. Partial benefits (e.g., those offered to spouses and not partners) will result in partial credit (5 points).

More information:

The CEI will evaluate the following family formation benefits:

- Adoption assistance
- Cryopreservation
- Infertility treatment coverage (non-in-vitro)
- Foster care assistance
- In-vitro fertilization
- Surrogacy benefits
- Paid family leave (not FMLA)

Due to differences in laws and regulations from state to state, providing family formation benefits is crucial for access to these services for LGBTQ+ people. It is also important to remove barriers that limit LGBTQ+ people from accessing these benefits. For example, health plans often require a diagnosis of infertility for family formation benefits and have a definition of infertility that excludes many LGBTQ+ couples and hopeful single parents.

RESOLVE: The National Infertility Association provides a variety of resources and information about insurance coverage for employers, which includes an evidence-based guide on providing employee fertility benefits and a model policy.

Examples:

Some companies utilize concierge services that specialize in family formation navigation. These “add-on" services can be helpful in incorporating family formation benefits into an existing health plan and are often LGBTQ+ inclusive. For example, Moffit Cancer Center and NYU Langone Health utilize Progyny, which has excellent LGBTQ+ examples and inclusion in their member guide.

Download Resolve's Coverage at Work Employer Toolkit, which includes a model benefit for Infertility Diagnosis and Treatment and Fertility Preservation Services.

Comprehensive Health Benefits (Criterion 2c)

Overview

Comprehensive Health Care Coverage

Much like the CEI's domestic partner benefits criteria, the premise of parity underlies the transgender-inclusive benefits section of the CEI criteria. For example, coverage for routine care, hormone therapies, and medically necessary surgeries is available to cisgender people (people who are not transgender) under virtually all employer-sponsored health insurance plans. These same healthcare benefits must also be extended to transgender people covered by these employer-sponsored plans to meet CEI criteria. Many employers have begun to comprehensively address health insurance coverage for transgender individuals, and most have experienced insignificant or no premium increases as a result.

To receive credit in Criteria 2c (25 points):

- Employers must have at least one firm-wide plan that explicitly affirms coverage for transition-related care (25 points).
    - Plan documentation should be readily available to employees and clearly communicate inclusive insurance options to employees and their eligible dependents.
    - To receive full credit, employers must remove all blanket exclusions for transition-related health care across every health plan offered.
      If any plan still includes broad exclusions for transition-related care, 15 points will be deducted from the total score for this criterion.

Healthcare Scored Questions

Does your business offer at least one comprehensive health insurance plan that provides inclusive coverage for all employees (including transgender employees), consistent with applicable healthcare regulations?

To receive credit in the CEI, a company must:

- Answer "yes"

- Upload a copy of the summary plan description (or summary material modification) that *explicitly affirms* coverage for transition-related care.
- Upload a copy of the applicable clinical guidelines (also called a medical policy).

Please attach a copy of your summary plan description (or summary material modification documentation) readily available to all employees, both prior to selecting and after enrolled in the plan, that explicitly indicates that coverage is available.

To receive credit in the CEI, a company must:

Upload a copy of a summary plan description (or summary material modification) that explicitly affirms coverage of transition-related care.

More information:

A summary plan description is a document that tells the plan participant (employee) what their specific plan provides and how it operates. For self-insured plan sponsors (employers), this document is unique to the organization.

Covered benefits must include:

- Mental health counseling
- Hormone replacement therapy
- Routine doctor's visits and lab testing
- Surgical procedures
- Paid short-term leave (whether employer provided or employer purchased)

Examples:

Dana-Farber Cancer Institute's plan through Harvard Pilgrim Healthcare outlines the covered health services for transgender employees, along with other important information about obtaining coverage.

UNC Health's plan details the different treatments for gender dysphoria that are covered by their plan.

Note: In order to receive credit, your company MUST submit a plan-specific document (such as a summary plan description, summary material modification, benefits summary, schedule of benefits, etc.) that affirms coverage of transition-related care. A clinical policy alone cannot be accepted for credit.

Please attach a copy of the applicable medical policy or clinical guidelines.

To receive credit in the CEI, a company must:

Upload a copy of the applicable medical policy for transition-related services, treatment of gender dysphoria, or a similar title.

More information:

A clinical policy bulletin (or medical policy) is a document that explains an insurer's determination of whether a service is medically necessary, how coverage is administered by the insurer, and under what circumstances. Clinical policy bulletins are not benefit contracts and do not constitute coverage on their own.

Examples:

Transgender and Gender Diverse Services - BCBS Massachusetts

Gender Affirming Surgery Medical Clinical Policy Bulletin - Aetna

Note: For the purposes of the CEI, a clinical policy alone (without a summary plan description or the like) is insufficient for credit. The reason for this is that clinical policies (aka medical policies) are an explanation of how a benefit is medically administered and managed, and they do not constitute proof of coverage. This is clearly stated in most clinical policy documents.

Are the following health insurance and leave benefits offered to employees, and do they cover medically necessary treatment of gender dysphoria?

To receive credit in the CEI, a company must:

- Have at least one plan that covers the following benefits for the treatment of gender dysphoria:
    - Mental health counseling
    - Pharmaceutical coverage (e.g., hormone replacement therapies)
    - Coverage for medical visits or laboratory services
    - Coverage for reconstructive surgical procedures related to gender reassignment (including reconstructive chest, breast, and genital procedures)

- Short-term medical leave (whether employer-provided or employer-purchased)

Does your company place any additional caps or limitations on care related to gender transition beyond the plan's standard coverage limits?

To receive credit in the CEI, a company must:

Have eliminated all separate monetary caps of transition-related coverage. Plans with monetary caps (regardless of amount) cannot be accepted for credit.

More information:

Treatment is Not Expensive: Includes available cost and utilization data demonstrating that the costs of treatments are inexpensive, and utilization of benefits is low.

Have all broad exclusions for medically necessary care associated with transition-related coverage been eliminated across all health insurance plans?

To receive credit in the CEI, a company must:

Have eliminated all blanket exclusions for transition-related care across all health care plans.

Have the appropriate executive-level person confirm that all benefit plans have been reviewed and that blanket exclusions on transition-related care have been removed by affirming the following statement with a digital signature:

I can affirm that all benefit plans have been examined, and no blanket exclusions on transition-related care are included in any of the company's benefit plans.

More information:

Most U.S. health insurance policies have exclusions listed on transition-related care, right alongside those for cosmetic or experimental care, even though the treatment of gender dysphoria is neither cosmetic nor experimental.

Historically, the vast majority of commercial health insurance plans in the United States excluded all or most coverage for treatment related to gender transition. This "transgender exclusion" denies coverage for treatments such as psychological counseling for initial diagnosis and ongoing transition assistance, hormone replacement therapy, doctor's office visits to monitor hormone replacement therapy, and surgeries related to sex reassignment.

Sometimes the exclusion's language is broad enough to deny coverage to a transgender person for treatments unrelated to transitioning, such as for a transgender man with a broken arm. These exclusions are based in part on bias against transgender and non-binary people and also in part on the erroneous belief that the cost of transition-related or gender-affirming care is high, which is not true. Furthermore, the healthcare industry is heavily reliant on a binary definition of gender, such that a transgender woman may be denied coverage for a prostate screening or a transgender man for a pap smear. Exclusions are generally found in a benefits summary plan description, which is available to all employees and applicants.

The good news is that many large corporations have removed most of the transgender exclusions from their health insurance policies and have affirmed benefits covering their transgender or transitioning employees to provide a base level of coverage for medical care, including mental health counseling, hormone therapy, puberty blockers for youth, medical visits and surgical procedures, and have provided short-term leave for treatments related to gender transition. Companies have had great success in removing discriminatory exclusions when they negotiate with their carriers, especially when they are able to provide a high level of information to the carrier in the process.

Source: [Gender Diversity in the Workplace: A Transgender & Non-binary Toolkit for Employers]

A complete list of exclusions will be found in the insurance contract, and partial lists are usually found in summary plan documents.

Comprehensive Health Benefits Guide (Criterion 2d)

Overview

Why a comprehensive Benefits Guide?

LGBTQ+ employees still face significant challenges in gaining access to medically necessary care, even when robust healthcare offerings are technically available. For example, employees often feel compelled to out themselves in order to gain information regarding their healthcare plans, such as transgender-inclusive healthcare services and treatment options.

Additionally, there is often a lack of clarity on what services and treatments are covered under employers' insurance plan(s). We also see a need to support troubleshooting any challenges that may occur while seeking access to services and treatment. Thus, it is critical that employees know the services and treatment that are available to them without having to review dozens of pages of difficult-to-understand summary plan documents and clinical policies. It is also necessary that employees know who to contact and how to overcome challenges that they constantly face in attaining medically necessary care.

With this in mind, the HRC Foundation will require that employers develop and share a comprehensive health benefits guide outlining a general overview of coverage, particularly relevant to LGBTQ+ employees. This includes information on domestic partner benefits coverage, family formation services such as IVF and surrogacy assistance, HIV/AIDS care coverage, and transition-related care.

Comprehensive Health Benefits Guide Score Questions

Does your business present or create a comprehensive health benefits guide for employees that details available benefits, including partner benefits, family formation services, and healthcare coverage pertinent to the LGBTQ+ community?

To receive credit in the CEI, a company must:

Answer “yes.”

Upload a copy of the company’s comprehensive health benefits guide.

More information:

This guide must include information on domestic partner benefits coverage, coverage for family formation services (such as IVF, adoption assistance, and surrogacy assistance), HIV/AIDS care coverage, and coverage for transition-related care.

Examples:

HRCF's templates for Comprehensive Health Benefits Guides

Micron's LGBTQ+ Benefits Guide

Bayer's LGBTQ+ Benefits Guide

Criterion 3: Supporting an Inclusive Culture

The questions in this criterion all relate to best practices in Internal Training and Accountability, and Inclusive Culture Best Practices. The scored questions in this criterion come from the following sections of questions from the Corporate Equality Index Survey.

This criterion is divided into four scored subsections:

- Workforce Training and Accountability
- In order to earn full credit (5 points) for Workforce Training and Accountability, the company must demonstrate a sustained and accountable commitment to diversity and cultural competency by implementing at least one training or development elements that incorporate LGBTQ+ topics.
- Inclusive Culture Best Practices.
    - Workforce Data Collection (5 points)
    - Inclusion Best Practices (5 points); and
    - an LGBTQ+ ERG accessible to all employees or diversity council that includes LGBTQ+ issues (10 points).

Workforce Training and Accountability (Criterion 3a)

Overview

Why inclusive internal training and best practices?

Despite progress in workplace LGBTQ+ inclusion, 46 percent of LGBTQ+ employees are closeted at their job. Equitable policies and benefits are critical to LGBTQ+ inclusion in the workforce but alone are not sufficient to support a truly inclusive culture within a workplace. Employers recognize that beyond the letter of a policy, additional programming and educational efforts are necessary. Ultimately, businesses invest in organizational competency programs because policy does not equal practice.

To receive credit in Criteria 3a (5 points):

Businesses must demonstrate a firm-wide, sustained, and accountable commitment to diversity and cultural competency, including at least four of the following elements and the integration of intersectionality concepts into a training or education offering (5 points):

- New hire training clearly states that the nondiscrimination policy includes gender identity and sexual orientation and provides definitions or scenarios illustrating the policy for each.
- Supervisors undergo training that includes gender identity and sexual orientation as discrete topics (may be part of a broader training), and provides definitions or scenarios illustrating the policy for each.
- Integration of gender identity and sexual orientation in professional development, skills-based or other leadership training that includes elements of diversity and/or cultural competency.
- Senior management/executive performance measures include LGBTQ+ diversity metrics.
- Integration of intersectionality in professional development, skills-based, or other training (may be a part of a broader training or aforementioned training) (required for credit).

Workforce Training and Accountability Scored Questions

Which of the following training and leadership initiatives that include LGBTQ+ experiences does your business implement? (Select all that apply.)

To receive credit for this effort, a company must:

Businesses must offer at least one training or leadership initiative that includes LGBTQ+ experiences as part of the training content out of the following options:

- New Hire Training (outlines non-discrimination policy, including protected characteristics and practical examples)
- Manager Training (outlines non-discrimination policy, including protected characteristics and practical examples)
- Ongoing/Broader Professional Dev/Training (incorporates diversity-related topics into broader professional development or leadership training)
- Comprehensive Training Approach (integrates broader diversity and inclusion concepts into professional development or educational programs)

Inclusive Culture Best Practices (3b through d)

Overview

What are inclusive culture best practices?

To receive credit in Criteria 3b through d (20 points):

Businesses must demonstrate firm-wide, sustained efforts to measure LGBTQ+ identity with data collection, including at least one of the following elements (5 points):

- Anonymous employee engagement or climate surveys where employees can voluntarily disclose their demographic information also include the optional questions to capture sexual orientation and gender identity.
- Data collection forms that include employee race, ethnicity, gender, military and disability status — typically recorded as part of employee records — include optional questions to capture sexual orientation and gender identity.
- Board (or other governing body) member forms that capture demographic data collection also include optional questions to capture sexual orientation and gender identity.

Businesses must demonstrate an ongoing commitment to workplace inclusion with the following efforts (5 points):

- Gender transition guidelines with supportive restroom, dress code, documentation information, and practical guidance on navigating an employee's transition.
- Implementation of at least one (1) of the following policies or practices:
  - Inclusive restroom/facilities policy.
  - Gender-neutral dress code.
  - Communication or guidance around the optional sharing of gender pronouns.

Participants must have either an LGBTQ+ employee resource group accessible to all employees *or* a diversity council inclusive of LGBTQ+ topics (10 points).

Workforce Data Collection Scored Questions

Does your business have anonymous employee surveys, such as employee engagement or climate surveys, where employees can voluntarily disclose their demographic information (including their gender identity and sexual orientation)?

To receive credit for this effort, a company must:

Indicate that their anonymous employee engagement survey captures LGBTQ+ demographic information.

More information:

Review our [Self-Identification of LGBTQ+ Employees] webpage and [Employer Guide to LGBTQ+ Self-ID] resource that provides guidance on inclusive language and sample questions.

Note: In order to receive credit, HRIS or anonymous surveys must ask about LGBTQ+ identity broadly or ask about sexual orientation and gender identity. "Gender identity" must include options beyond just "male" and "female" to count for credit.

Separate from, or in addition to, the anonymous survey, do you have confidential human resources information systems (or HRIS) where employees can voluntarily disclose their demographic information (including their gender identity and sexual orientation)?

To receive credit for this effort, a company must:

Indicate that their HR Information System captures LGBTQ+ demographic information.

More information:

Review our [Self-Identification of LGBTQ+ Employees] webpage and [Employer Guide to LGBTQ+ Self-ID] resource that provides guidance on inclusive language and sample questions.

Note: In order to receive credit, HRIS or anonymous surveys must ask about LGBTQ+ identity broadly or ask about sexual orientation and gender identity. "Gender identity" must include options beyond just "male" and "female" to count for credit.

In your Board member registration forms, do you allow board members to voluntarily disclose their demographic information (including their sexual orientation and gender identity)?

To receive credit for this effort, a company must:

Answer "Yes" to affirm that board members are able to voluntarily self-ID their sexual orientation and/or gender identity, or as a part of the LGBTQ+ community.

More information:

OutLeadership's research report on LGBTQ+ board diversity.

Note: In order to receive credit, board self-ID surveys must ask about LGBTQ+ identity broadly or ask about sexual orientation or gender identity. "Gender identity" must include options beyond just "male" and "female" to count for credit.

Inclusion Best Practices Scored Questions

Does your business have written guidelines outlining workplace policies and best practices to support employees through significant life changes, including a gender transition?

To receive credit for this effort, a company must:

Upload a copy of their Workplace Gender Transition Guidelines.

To receive credit, guidelines must include at least the following information:

- Who in the business is charged with helping a transitioning employee manage their workplace transition
- What a transitioning employee can expect from management
- What are management's expectations for staff, transitioning employees, and any existing LGBTQ+ ERGs in facilitating a successful workplace transition
- What the general procedure is for implementing transition-related workplace changes, such as adjusting personnel and administrative records, as well as a communication plan for co-workers and clients
- Answers to frequently asked questions about company policies, such as dress codes and restroom use policies.

More information:

For more about Workplace Gender Transition Guidelines, check out this resource.

For example, Gender Transition Guidelines, review page 28 of our Transgender & Non-binary Toolkit for Employers.

Has your business implemented at least one of the following inclusive policies or practices? (Please note, these should be firm-wide policies or practices that exist outside of the Gender Transition Guidelines.)

To receive credit for this effort, a company must:

Choose *at least* **one** of the following three options:

- Transgender-Inclusive Restroom/Facilities Policy

Note: We are not asking you about the construction of gender-neutral bathrooms

- Gender-neutral Dress Code Policy

The policy should outline relevant expectations for dress in the workplace, irrespective of gender.

- Policies/procedures that allow for the optional sharing of gender pronouns

More information:

For more about inclusive restroom/facilities policies, click here.

For more about gender-neutral dress code policies, click here (includes sample language).

Examples:

Sample Restroom Policy - HRC

Sample Pronoun Policy and Guide

Employee Group/Diversity Council Scored Questions

Does your business have an officially recognized LGBTQ+ employee group that is open to all eligible employees?

To receive credit in the CEI, a company must:

Answer "Yes" to indicate the company has an LGBTQ+ employee resource group (ERG) that is accessible to all employees

Provide the group name and email (if applicable).

Provide name and title of executive sponsor (Note: This information will *not* be made public).

More information:

Learn more about Establishing an Employee Resource Group with our resource.

Visit our page on Expanding Your Employee Resource Group.

Does your business have a firm-wide diversity council or working group that includes efforts to support an inclusive workplace for all employees, including LGBTQ+ employees?

To receive credit in the CEI, a company must:

- Answer "Yes" to indicate the company has a diversity council that includes LGBTQ+ topics.

Criterion 4: Outreach and Engagement

The questions in this criterion all relate to external best practices in outreach and engagement with the LGBTQ+ Community, external partnerships, and business practices. The scored questions in this criterion come from the following sections of questions from the Corporate Equality Index Survey.

This criterion is divided into two scored subsections:

- Outreach and Engagement
    - This section evaluates outreach and engagement with the broader LGBTQ+ community. Participating companies can earn full (15 points) or partial (10 points) credit. In order to earn full credit, companies with existing supplier diversity programs must include LGBTQ+ employers as a part of the program.
- External Partnerships & Business Practices
    - In order to earn full credit (5 points) for this criterion, employers with nondiscrimination standards for third-party suppliers must include sexual orientation and gender identity. Employers must also have an internal-facing philanthropic giving policy prohibiting charitable giving to non-religious organizations with an explicit written policy of anti-LGBTQ+ discrimination.

Outreach and Engagement Efforts (Criterion 4a)

Overview

Outreach And Engagement Efforts

Businesses have extensive programs to engage with key markets and the communities in which they operate. Public commitment in the CEI is measured through a number of individual engagements, namely through:

- Employee recruitment efforts that reach LGBTQ+ applicants.
- Supplier diversity programs that include certified LGBTQ+ suppliers.
- Marketing or advertising that reflects or reaches LGBTQ+ communities.
- Philanthropic support for at least one LGBTQ+ organization or event (e.g., financial, in-kind, or pro bono support).
- Products and services that are inclusive of LGBTQ+ people.

To receive full credit in Criteria 4a (15 points):

- Businesses must demonstrate ongoing outreach and engagement with the LGBTQ+ community that extends across the firm, including an effort across any of the categories listed above.

Outreach and Engagement Scored Questions

Has your business completed at least ONE effort in any of the categories below demonstrating ongoing LGBTQ+ specific engagement?

To receive credit for these efforts, a company must:

Have completed at least one effort from any of the following categories:

- Employee recruitment efforts that reach LGBTQ+ applicants.
- Supplier diversity programs that include certified LGBTQ+ suppliers.
- Marketing or advertising that reflects or reaches LGBTQ+ communities.
- Philanthropic support for at least one LGBTQ+ organization or event (e.g., financial, in-kind, or pro bono support).
- Products and services that are inclusive of LGBTQ+ people.

External Partnerships & Business Practices (Criterion 4b)

Overview

External Partnerships & Business Practices

An employer's non-discrimination policies should not be limited to human resources or diversity and inclusion. The CEI’s external partnerships and business practices criteria ensure that sexual orientation and gender identity protections apply to those standards that businesses require their vendors or suppliers to adhere to, as well as recipients of their philanthropic funds.

To receive credit in Criteria 4b (5 points):

- Existing supplier/vendor non-discrimination standards must include "sexual orientation" and "gender identity," alongside other protected categories; AND;

- Employers must have giving guidelines that prohibit philanthropic support of non-religious organizations with an explicit policy of discrimination on the basis of sexual orientation and/or gender identity.

External Partnerships & Business Practices Scored Questions

Does your business require your suppliers/vendors to prohibit discrimination consistent with the protections provided by your EEO or non-discrimination policy?

To earn credit, a company must:

Have existing non-discrimination standards that include "sexual orientation" and "gender identity," alongside other protected categories.

More information:

Businesses of the size included in the CEI (a minimum of 500 full-time US employees) typically have set standards and guidelines already embedded in their procurement. This simply ensures consistency in the corporate policies and values of non-discrimination between the employer and its contractors –those it decides to reward with its business.

Many worksites have employees from different businesses working side by side. For example, a large defense firm may be made up of three separate private contractors working together on the same project. This change makes the expectations and policies in the workplace more consistent.

Review our resource on inclusive supplier/vendor standards.

Examples:

Bank of America Supplier Code of Conduct

Note: If a company does not use third-party suppliers/vendors or does not have existing non-discrimination standards, there is no penalty. We are simply asking if existing non-discrimination standards include "sexual orientation" and "gender identity" alongside other protected classes.

Does your business have guidelines that prohibit philanthropic support (financial, in-kind, or employee matching donations) to any non-religious organizations that have a written policy of discrimination against LGBTQ+ people (i.e., organizations that actively discriminate on the basis of sexual orientation and gender identity)?

To receive credit in the CEI, a company must:

Submit a copy of their applicable philanthropic giving guidelines that specifically include "sexual orientation" and "gender identity" as it refers to the recipient organization's non-discrimination.

More information:

Philanthropic giving refers to corporate foundational giving, corporate in-kind donations, and employee matching-gift programs.

Examples:

Levi Strauss Foundation Grantmaking Guidelines

Note: Guidelines must specifically enumerate "sexual orientation" and "gender identity" alongside any other protected categories in order to receive credit. Guidelines can refer to the participant company's existing non-discrimination/EEO policy.