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December 30, 2013

The Honorable Tom Saxhaug, Chair State Departments & Veterans Division 328 State Capitol St. Paul, MN 55155

The Honorable Kari Dziedzic, Vice chair State Departments & Veterans Division 320 State Capitol St. Paul, MN 55155

The Honorable Roger C. Chamberlain Ranking Minority Member State Departments & Veterans Division 129 State Office Building St. Paul, MN 55155 The Honorable Mary Murphy, Chair House Government Finance & Veterans Affairs 443 State Office Building St. Paul, MN 55155

The Honorable Jerry Newton, Vice Chair House Government Finance & Veterans Affairs 575 State Office Building St. Paul, MN 55155

The Honorable Bob Dettmer Ranking Minority Member House Government Finance & Veterans Affairs 279 State Office Building St. Paul, MN 55155

RE: Minnesota Local Government Pay Equity Compliance Report

Dear Senators and Representatives:

Minnesota Statute (M.S.) 471.999 directs Minnesota Management & Budget to prepare the attached annual report and submit to the chairs and ranking members of each of the Senate and House committees having responsibility for local government pay equity compliance.

Questions regarding this report may be directed to John Pollard at (651) 201.8039.

Sincerely,

Jim Schowalter Commissioner

cc: Kevin Lundeen, Senate Fiscal Analyst Bill Marx, House Fiscal Analyst Eric Nauman, Senate Fiscal Analyst Helen Roberts, House Fiscal Analyst January 2014

Minnesota Local Government Pay Equity Compliance Report

Submitted to the Minnesota Legislature by Minnesota Management & Budget

400 Centennial Office Building 658 Cedar Street St. Paul, MN 55155

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Executive Summary

Minnesota Management & Budget (MMB) is responsible for the enforcement of the Local Government Pay Equity Act (Minnesota Statutes 471.991 - .999 and Minnesota Rules Chapter 3920).

In 2010 MMB completed a major project to upgrade the software local governments use to submit reports. The web-based software was used for the first time in 2011 by 500 local governments. As of this report, all 1,500 local governments have used the new software to create and submit their reports. The new web-based application proved highly efficient and greatly reduced the staff time needed at both the local and state level.

The Local Government Pay Equity Act applies to about 1,500 local governments in Minnesota, and affects a total of about 220,000 local government employees. Jurisdictions are scheduled to report on a three-year cycle, meaning that MMB receives approximately 500 reports each year.

Overall, local governments have achieved a high level of compliance - both in meeting reporting requirements and implementing pay equity for their employees. The success of this program is largely attributable to the ongoing assistance and monitoring provided by the MMB Pay Equity Unit and to the commitment on the part of local governments.

In January 2013, 484 local governments were required to submit reports to MMB. As of December 11, 2013, a total of 481 (99%) of the jurisdictions were in compliance, three remain out of compliance.

While a jurisdiction may have achieved equitable compensation and be in compliance for one reporting cycle, this does not guarantee that all future reports will be in compliance. Therefore, it is important for local governments to continually review their pay structure and submit reports every three years to the State for review and analysis. This on-going requirement to report prevents regression into inequitable compensation practices and reduces sex-based wage disparities in public employment throughout Minnesota.

About This Report

Minnesota Management & Budget (MMB) is responsible for enforcement of the Local Government Pay Equity Act, and is required to submit an annual report to the state legislature regarding local government pay equity compliance. Minnesota Statute (M.S.) 471.999 states:

The report must include a list of the political subdivisions in compliance with section 471.992, subdivision 1, and the estimated cost of compliance. The report must also include a list of political subdivisions found by the commissioner to be not in compliance, the basis for that finding, recommended changes to achieve compliance, estimated cost of compliance, and recommended penalties, if any. The commissioner's report must include a list of subdivisions that did not comply with the reporting requirements of this section. The commissioner may request, and a subdivision shall provide, any additional information needed for the preparation of a report under this subdivision.

The 2014 annual Minnesota Local Government Pay Equity Report was prepared entirely by MMB staff as part of routine work assignments. This report is based on local jurisdiction pay equity reports due to MMB in 2013.

This document can be made available, upon request, in alternate formats such as large print, Braille or audiotape.

Questions regarding this report may be directed to (651) 201-8039.

Section One Background Information

Requirements of the Law

The Local Government Pay Equity Act (LGPEA) of 1984 (M.S. 471.991 to 471.999) required local governments to "establish equitable compensation relationships" by December 31, 1991. Other common terms for "equitable compensation relationships" are "comparable worth" or "pay equity." Compliance must be maintained and jurisdictions are periodically evaluated. Jurisdictions are on a three-year reporting cycle with approximately 500 jurisdictions reporting each year.

The purpose of the law is "to eliminate sex-based wage disparities in public employment in this state." Equitable compensation relationships are achieved when "the compensation for female-dominated classes is not consistently below the compensation for male-dominated classes of comparable work value... within the political subdivision."

The law requires MMB to determine whether local governments have achieved pay equity, based on implementation reports submitted by local governments.

Responsibilities of Minnesota Management & Budget

A. Pay Equity Rule Adopted

In 1991, the Legislature authorized MMB to adopt rules under the Administrative Procedures Act to assure compliance with the Local Government Pay Equity Act (Laws 1991, chapter 128, section 2).

That same year, MMB asked employer organizations, unions, and women's groups to name representatives to serve on a rulemaking advisory committee. This 30-member group met to discuss and review compliance guidelines and advise the department on the pay equity rule. MMB adopted the rule MCAR 3920, October 1992.

B. Assistance to Local Governments

In 1989, MMB established a full-time pay equity coordinator position. The coordinator has assisted local governments through extensive training, consultation, and analysis of their pay equity reports.

MMB has communicated through various means with the approximately 1,500 local governments required to comply with the law. The department has produced numerous free technical assistance publications available at no cost to the jurisdiction.

MMB has periodically offered training sessions and delivered presentations at various conferences. MMB has also developed DVDs explaining reporting requirements, compliance requirements and job evaluation methodology.

In 2010, MMB developed and launched a new highly efficient web-based software program to help jurisdictions submit reports, determine the underpayment of female job classes and calculate the results for several of the compliance tests. The new software replaced an older downloadable version and local government staff has indicated it is much more user-friendly. Several enhancements have been made to the program since that time in the spirit of continuous improvement.

Pay Equity Implementation Activities for 2013

• Analysis of Pay Equity Reports

By the end of January 2013, 484 local jurisdictions were required to submit a Pay Equity Report to MMB. As of December 11, 2013, a total of 481 (99%) of the jurisdictions were in compliance, three (<1%) remained out of compliance. All jurisdictions that are out of compliance or decision pending need corrections or clarification or other follow-up work with the local jurisdiction. This may involve several preliminary reports and investigations to verify accuracy.

• 2013 Annual Report to Legislature

Staff prepared the report to the legislature on the status of compliance and noncompliance regarding each local government.

• Communication Regarding Non-Compliance

Staff provides ongoing communication to jurisdictions regarding the need to submit updated reports to achieve compliance.

• Consultation and Technical Assistance

Provided consultation and technical assistance to jurisdictions that were found out of compliance and developed strategies to achieve compliance and avoid any potential penalties.

• MMB Web Site

Continue to maintain and update MMB's pay equity Web page and the State Job Match manual. The web page also includes pay equity reporting instructions, compliance requirements and pay equity analysis software. All are available on the web free of charge.

Section Two Tests for Compliance

A. Tests for Compliance

The tests for compliance are summarized below. Complete details for each of the tests can be found in Minnesota Rules Chapter 3920. The "recommended action" after each is a brief overview of the general advice MMB gives to jurisdictions that did not pass a particular test. Reports to each jurisdiction are individualized and identify specific problems and requirements to pass the compliance test(s).

1. **Completeness and accuracy test (CA)** - determines whether jurisdictions have filed reports on time, included correct data and supplied all required information.

Recommended action: Supply any required information not included in the report, make certain all data is correct and submit report by the required date.

2. **Statistical analysis test (ST)** - compares salary data to determine if female classes are paid consistently below male classes of comparable work value (job points). Software is used to calculate this test. For smaller jurisdictions, the alternative analysis is used instead of the statistical analysis.

Recommended action: Adjust salaries to reduce the number of female classes compensated below male classes of comparable value, or reduce the difference between the average compensation for male classes and female classes to the level where it is not statistically significant.

3. Alternative analysis test (ALT) - compares salary data to determine if female classes are paid below male classes even though the female classes have similar or greater work value (job points). Also evaluates the compensation for female classes rated lower than all other classes to see if it is as reasonably proportionate to points as other classes.

Recommended action: *Eliminate the amount of the inequity identified between the salaries for female classes and male classes.*

4. **Salary range test (SR)** - compares the average number of years it takes for individuals in male and female classes to reach the top of a salary range. This test only applies to jurisdictions that have classes where there are an established number of years to move through salary ranges.

Recommended action: Bring more consistency to the average number of years it takes to move through a salary range for male and female classes to meet the minimum standard for passing the test.

5. Exceptional service pay test (ESP) - compares the number of male classes in which individuals receive longevity or performance pay above the maximum of the salary range to the number of female classes where this occurs. This test applies only to jurisdictions that provide exceptional service pay.

Recommended action: Bring more consistency to the number of male and female classes receiving exceptional service pay to meet the minimum standard for passing the test.

B. Summary of Tests Failed After Initial Analysis

The following is a summary of 484 reports submitted by jurisdictions for the reporting year 2013. 79 or 16% of the reports were initially found out of compliance. A specific breakdown regarding each test follows:

Test Failed	Number
Completeness and Accuracy Test	34
Statistical Analysis Test	13
Alternative Analysis Test	13
Salary Range Test	16
Exceptional Service Pay Test	3
Total	79

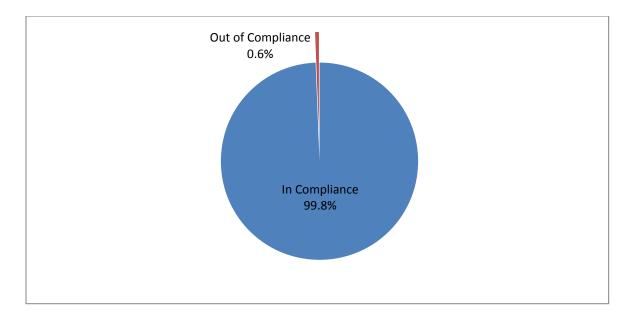
Section Three Summary of Compliance Status of Local Governments

2013 Summary of Compliance Status by Jurisdictional Type December 11, 2013 – State Pay Equity Database for Local Jurisdictions

Jurisdiction		Out of	Decision	
Туре	In Compliance	Compliance	Pending	Total
City	203	1	0	204
County	25	0	0	25
Schools	101	2	0	103
Soil & Water				
Conservation				
Districts				
(SWCDs)	24	0	0	24
Other Districts	40	0	0	40
Housing and				
Redevelopment				
Authorities				
(HRAs)	27	0	0	27
Townships	37	0	0	37
Utilities	15	0	0	15
Health Care Fac.	9	0	0	9
TOTAL	481	3	0	484

Compliance Status of 2013 Reports

In January 2013, 484 local governments were required to submit a report to MMB. After initial analysis of the reports, 311 (64%) were in compliance, 79 (16%) were out of compliance, and 94 (19%) needed further clarification. As of December 11, 2013, a total of 481 (99%) of the jurisdictions were in compliance and three (<1%) remain out of compliance.



Compliance Status of Reports as of December 11, 2013

Inequities Identified in Pay Equity Reports

For the past several reporting years, MMB has examined the inequities found in jurisdictions that were not in compliance to determine how the wage gap between comparable male and female job classes changed after pay equity wage increases were given. This report includes examples of inequities that were found and corrected in some of the jurisdictions that were found out of compliance.

Inequities were identified in instances where females were paid less than males even though their job evaluation ratings indicated that the females should be paid at least equal to the males. In addition, disparities could not be accounted for by length of service or performance differences. For example, a female in the position of city clerk, rating of 275 points, was paid less than a male in a maintenance position with a rating of 213 points. Typical inequities in cities were found primarily between city clerks and maintenance workers.

In schools, the greatest potential for inequities is found considering the number of years to achieve maximum salary for licensed staff (teachers) in comparison to the non-licensed or support staff.

Position	Hourly Wage ''Before''	Hourly Wage "After"	Difference
Bartender	\$12.00	\$12.40	\$0.40
Clerk/Treasurer	\$17.00	\$17.70	\$0.70
Accounting Clerk	\$22.01	\$24.55	\$2.54
Deputy Clerk	\$23.82	\$27.20	\$3.38
Ambulance Manager	\$25.86	\$28.82	\$2.96

Examples of Inequities Identified in Pay Equity Reports

Section Four Jurisdictions Not in Compliance

A. Jurisdictions Not in Compliance -

The jurisdictions listed below have all received a "first notice of non-compliance" but at this time no penalties have been assessed. Some of the jurisdictions on this list have recently submitted second reports yet to be reviewed. Any jurisdiction on this list could receive a penalty notice at a later time if they fail to submit a new report that passes all compliance tests.

The abbreviations for the tests for compliance used in this section are: CA – completeness and accuracy; ST – statistical salary comparison analysis; ALT – alternative salary comparison salary analysis; SR – salary range and ESP – exceptional service pay. A complete description of each of these tests and the specific actions MMB recommended to each jurisdiction to achieve compliance can be found in section two of this report.

Jurisdiction	Test(s) Failed	Est. Monthly Cost to Achieve Compliance	Cost as % Payroll
Cities Round Lake	ALT	\$116.52	1.2%
School Districts ISD No. 625-St. Paul ISD No. 2142-St. Louis County	SR SR	*	0.1% 0.1%

*Data to calculate a specific amount was not available to MMB at the time of this report, but based on MMB analysis of average costs, MMB estimates that the cost would not exceed 0.1% of payroll and would probably be less.

B. Jurisdictions Not in Compliance – Second Notice of Non-Compliance

At this time there are no jurisdictions that have received a second notice of non-compliance with the Local Government Pay Equity Act and a notice that they are subject to a penalty. If there were any jurisdictions in this category, MMB would have specified the reason for non-compliance, recommended actions to achieve compliance and estimated the cost of achieving for compliance for each of these jurisdictions.

Prior to any penalties being assessed, a jurisdiction subject to a penalty would have had several opportunities to avoid such a notice including a first notice of non-compliance and a grace period to make corrections and achieve compliance. In addition, any non-compliant jurisdictions would have been:

• Warned that failure to achieve compliance by the end of the grace period would result in a second notice of non-compliance and a penalty notice. Also, that the penalty would be the greater of a 5% reduction in state aid or \$100 per day assessed from the original deadline for compliance and would continue until compliance was achieved.

- Advised of the reason they were found out of compliance, the results of the tests for compliance and an explanation of the results.
- Encouraged to contact MMB for technical assistance and review of potential salary and other adjustments to see if they would meet compliance requirements.
- Advised to request reconsideration if they wished to explain circumstances and ask for a reversal of MMB's decision, or request an extension of the grace period to achieve compliance.
- Sent a courtesy reminder letter from MMB 30 days prior to the end of their grace period reminding them of the deadline for achieving compliance and submitting a new report.

Any penalized jurisdiction would have had the option to request a suspension of the penalty and/or file a contested case appeal. Penalties may not be imposed while an appeal is pending.

The law allows MMB to consider the following factors when deciding whether to suspend any portion of a penalty: circumstances beyond a jurisdiction's control, severe hardship, non-compliance due to factors unrelated to gender, and steps the jurisdiction has taken to achieve compliance. Jurisdictions also have the option to submit a contested case appeal on the new penalty amounts.

Because penalties continue until compliance is achieved, jurisdictions that do not achieve compliance are subject to additional penalties. No penalties may be imposed until the end of the legislative session in which MMB submits a report listing a jurisdiction as not in compliance. MMB makes compliance decisions on an ongoing basis and updates the legislature annually.

C. Jurisdictions Not in Compliance – Penalties Resolved

A total of 96 penalty cases have been resolved over the past 16 years resulting in \$1,267,851.00 in total restitution paid to approximately 1,300 employees for past inequities. A total of \$210,233 has been collected in penalties. The penalties go to the general fund and not to MMB.

Section Five Jurisdictions in Compliance

Cities Adrian Akeley Alvarado Andover Annandale Anoka Appleton Askov Atwater Aurora Badger Barrett Battle Lake Beaver Bay Becker Belgrade **Belle** Plaine Bethel **Big Falls** Blackduck Blaine Bloomington Breckenridge Bricelyn Brownton Buhl Burnsville Caledonia Canby Carver Champlin Chaska Chatfield Chokio Circle Pines Clements Cleveland Clontarf Cold Spring Cologne Columbia Heights Columbus Coon Rapids Cosmos Cottage Grove Crystal Currie Danvers Dellwood Dilworth Dunnell

Eagan Eden Valley Edgerton Edina Elgin Elk River Ellendale Ellsworth Evota Fairmont Fifty Lakes Floodwood Fosston Fountain Freeport Fridley Frost Glenwood Good Thunder Graceville Granite Falls Grant Greenbush Grove City Halstad Hanska Hawley Hector Hendrum Herman Hermantown Hibbing Hill City Hills Hinckley Hopkins Houston Independence Inver Grove Heights Isle Karlstad Kasota Kelliher Kerkhoven La Crescent Lafayette Lake City Lake Lillian Lanesboro Le Center LeRoy Lester Prairie

Lewiston Lino Lakes Lismore Litchfield Little Falls Long Prairie Mabel Mankato Mantorville Maple Plain Mapleview Maynard Medford Melrose Milroy Miltona Minnetonka Montgomery Morgan Motley Mounds View Mountain Lake Nevis New Brighton New Hope New London New Ulm Newfolden Nicollet North Branch North Mankato North Oaks Northome Odessa Ogema Oklee Orono Ostrander Owatonna Park Rapids Pelican Rapids Pemberton Peterson Pine City Plainview Plato Preston Princeton Prinsburg Ranier Raymond Red Lake Falls

Cities Continued

Remer Rice Richmond Rock Creek Rockville Rosemount Rushford Village Russell Sacred Heart Savage Sebeka Shoreview Silver Bay Sleepy Eye South St. Paul Spicer

Counties

Anoka County Becker County Benton County **Big Stone County** Carver County Cass County Clearwater County Cook County Dodge County Goodhue County Grant County Hennepin County Lac Qui Parle County Lake County Martin County Nicollet County Norman County Olmstead County Polk County Redwood County Rock County Scott County Wadena County Waseca County Yellow Medicine County St. Anthony St. Bonifacius St. Clair St. Cloud St. Francis St. Hilaire St. James St. Paul Park St. Peter Starbuck Stewart Stillwater Swanville Truman Vergas Verndale

Waconia Wadena Waite Park Wanamingo Warroad Waseca Wayzata West Concord West St. Paul Windom Winona Winsted Winthrop Winton Wood Lake Zimmerman

Health Care Facilities

Appleton Area Health Services Cottonwood/Jackson Community Health Service Granite Falls Municipal Hospital & Manor Hennepin County Medical Center Johnson Memorial Health Services Northern Itasca Hospital District Northfield Hospital & Clinic Rivers Edge Hospital & Clinic So. Country Health Alliance

Housing and Redevelopment Authorities

Blue Earth HRA Brainerd HRA Breckenridge HRA Cass County HRA Cook HRA Cottonwood HRA Crookston Housing & EDA Crosby HRA Dakota County CDA Detroit Lakes HRA Eveleth HRA Litchfield HRA Madison HRA Marshall Public Housing Commission Montevideo HRA Moorhead PHA Mower County HRA Pine City HRA Pipestone HRA South St. Paul HRA St. Peter HRA Swift County HRA Thief River Falls HRA Virginia HRA Walker HRA Windom HRA Winona HRA

Independent School Districts

ISD No. 100 - Wrenshall ISD No. 11 - Anoka-Hennepin ISD No. 110 - Waconia Public Schools ISD No. 112 - Chaska ISD No. 113 - Walker- Hackensack-Akeley ISD No. 13 - Columbia Heights ISD No. 14 - Fridley ISD No. 150 - Hawley ISD No. 16 - Spring Lake Park ISD No. 173 - Mountain Lake ISD No. 181 - Brainerd ISD No. 186 - Pequot Lakes ISD No. 197 - West St. Paul ISD No. 1A - Minneapolis ISD No. 206 - Alexandria ISD No. 2155 - Wadena- Deer Creek ISD No. 2172 - Kenyon- Wanamingo ISD No. 2176 - Warren- Alvarado-Oslo ISD No. 2180 - MacCray ISD No. 2190 - Yellow Medicine East ISD No. 2198 - Fillmore Central ISD No. 2310 - Sibley East Schools ISD No. 238 - Mabel-Canton ISD No. 2396 - Atwater-Cosmos-Grove City ISD No. 2397 - LeSueur- Henderson ISD No. 241 - Albert Lea ISD No. 2448 - Martin County West ISD No. 253 - Goodhue ISD No. 256 - Red Wing ISD No. 2687-Howard Lake- Waverly-Winsted ISD No. 271 - Bloomington ISD No. 2711 - Mesabi East ISD No. 272 - Eden Prairie ISD No. 2752 - Fairmont Area ISD No. 2759 - Eagle Valley Public Schools ISD No. 2769 - Morris ISD No. 277 - Westonka ISD No. 279 - Osseo ISD No. 282 - St. Anthony- New Brighton ISD No. 2853 - Lac Qui Parle Valley School ISD No. 2859 - Glencoe- Silver Lake ISD No. 286 - Brooklyn Center ISD No. 2898 - Westbrook- Walnut Grove ISD No. 2902 - Russell-Tyler- Ruthton ISD No. 2904 - Tracy Area Public Schools ISD No. 2905 - Tri-City United ISD No. 297 - Spring Grove ISD No. 308 - Nevis ISD No. 309 - Park Rapids ISD No. 316 - Greenway

ISD No. 318 - Grand Rapids ISD No. 32 - Blackduck ISD No. 361 - International Falls ISD No. 381 - Lake Superior ISD No. 415 - Lynd ISD No. 466 - Dassel-Cokato ISD No. 473 - Isle ISD No. 485 - Royalton ISD No. 487 - Upsala ISD No. 492 - Austin ISD No. 500 - Southland ISD No. 507 - Nicollet ISD No. 513 - Brewster ISD No. 516 - Round Lake ISD No. 533 - Dover-Eyota ISD No. 535 - Rochester ISD No. 549 - Perham ISD No. 550 - Underwood ISD No. 577 - Willow River ISD No. 595 - East Grand Forks ISD No. 623 - Roseville ISD No. 640 - Wabasso ISD No. 695 - Chisholm ISD No. 696 - Ely ISD No. 704 - Proctor ISD No. 716 - Belle Plaine ISD No. 720 - Shakopee ISD No. 726 - Becker ISD No. 738 - Holdingford ISD No. 740 - Melrose ISD No. 741 - Paynesville ISD No. 743 - Sauk Centre ISD No. 75 - St. Clair ISD No. 750 - Rocori ISD No. 756 - Blooming Prairie ISD No. 768 - Hancock ISD No. 81 - Comfrey ISD No. 813 - Lake City ISD No. 832 - Mahtomedi ISD No. 833 - South Washington County Schools ISD No. 84 - Sleepy Eye ISD No. 857 - Lewiston-Altura ISD No. 879 - Delano ISD No. 88 - New Ulm ISD No. 881 - Maple Lake ISD No. 885 - St. Michael- Albertville ISD No. 916 - Northeast Metro ISD No. 917 - Rosemount ISD No. 93 - Carlton ISD No. 95 - Cromwell-Wright

Others

Anoka-Champlin Fire Department Area Special Education Cooperative Arrowhead Region Computing Consortium Arrowhead Regional Corrections Benton/Stearns Education District #6383 Centennial Lakes Police Department Central Minnesota Community Corrections Central MN Educational Research & Development Council Duluth Airport Authority Fergus Falls Area Special Education Coop No. 935 Freshwater Education District #6004 International Falls Recreation Commission Metro ECSU Metropolitan Council Metropolitan Library Service Agency (MELSA) Midwest Special Education Inter-district Cooperative Minneapolis Municipal Building Commission Minneapolis Parks and Recreation Board Minnesota River Valley Special Education Cooperative Minnesota Valley Cooperative Center Mississippi Headwaters Board Mississippi Watershed Management Organization Northwest Regional Library Northwest Service Cooperative Pioneerland Library System Region 5 Development Commission Region I Information Management Services Rice Creek Watershed District SAMMIE Seaway Port Authority/Duluth Southwest & West Central Service Cooperative Southwest Health and Human Services St. Cloud Area Planning Organization St. Cloud Metropolitan Transit Commission St. Paul Port Authority Three Rivers Park District Waseca-Le Sueur Regional Library Wright Technical Center District 0966 Yellow Medicine River Watershed District

Soil and Water Conservation Districts

Chippewa County SWCD Chisago SWCD East Otter Tail SWCD Isanti SWCD Koochiching SWCD Lake of the Woods SWCD Le Sueur County SWCD Marshall County SWCD Meeker SWCD Morrison SWCD Norman County SWCD North St. Louis SWCD Pennington SWCD **Ramsey Conservation District** Renville County SWCD Scott County SWCD So. St. Louis SWCD Traverse SWCD Wabasha County SWCD Wadena SWCD Waseca SWCD Watonwan County SWCD West Polk SWCD Wright SWCD