



February 7, 2022

Senator Mary Kiffmeyer, Chair
State Government Finance and Policy and
Elections Committee
3103 Minnesota Senate Building
St. Paul, MN 55155

Representative Michael Nelson, Chair
State Government Finance and Elections
Committee
585 State Office Building
St. Paul, MN 55155

Senator Jim Carlson, Ranking Minority Member
State Government Finance and Policy and
Elections Committee
2207 Minnesota Senate Building
St. Paul, MN 55155

Representative Jim Nash, Minority Lead
State Government Finance and Elections
Committee
349 State Office Building
St. Paul, MN 55155

Dear Members of the Minnesota Legislature:

Minnesota Management and Budget (MMB) is responsible for the enforcement of the Local Government Pay Equity Act ([Minnesota Statutes 471.991 - 471.999](#) and [Minnesota Rules Chapter 3920](#)).

Please see attached Minnesota Local Government Pay Equity Compliance Report. The Local Government Pay Equity Act (LGPEA) examines local government pay structures for evidence of gender inequity. The act applies to about 1,700 local governments in Minnesota, and affects a total of about 220,000 local government employees.

For any questions, please contact Kevin McHenry at kevin.c.mchenry@state.mn.us

Sincerely,

A handwritten signature in black ink that reads 'Jim Schowalter'.

Jim Schowalter
Commissioner



January 2022

Minnesota Local Government Pay Equity Compliance Report

**Submitted to the Minnesota Legislature by
Minnesota Management and Budget**

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

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Executive Summary

Minnesota Management and Budget (MMB) is responsible for the enforcement of the Local Government Pay Equity Act ([Minnesota Statutes 471.991 - 471.999](#) and [Minnesota Rules Chapter 3920](#)).

The Local Government Pay Equity Act (LGPEA) examines local government pay structures for evidence of gender inequity. The act applies to about 1,700 local governments in Minnesota, and affects a total of about 220,000 local government employees. These totals have increased as additional local governments began reporting.

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

In January 2021, a total of 541 local governments were required to submit reports to MMB. As of December 17, 2021, a total of 536 (99%) of the jurisdictions were in compliance, five jurisdictions remained out of compliance.

As a result of the COVID-19 pandemic many local governments experienced changes in staffing, roles and responsibilities. In 2021, there was an increase in the number of jurisdictions that requested a longer grace period to achieve compliance. MMB acknowledges and appreciates the hard work of all the local jurisdictions to ensure pay equity compliance under these trying conditions.

About This Report

Minnesota Management and Budget staff prepared the 2021 Annual Minnesota Local Government Pay Equity Report as part of routine work assignments. This report is based on local jurisdiction pay equity reports provided to MMB in 2021.

Please contact us if you need this report in alternate formats such as large print, braille or audio.

Questions? Contact Kevin McHenry at Kevin.C.McHenry@state.mn.us.

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.”

The purpose of the LGPEA 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 LGPEA requires jurisdictions to be periodically evaluated and be in compliance. The law requires Minnesota Management and Budget (MMB) to determine whether local governments have achieved pay equity, based on implementation reports submitted by local governments.

Jurisdictions report pay equity data on three-year reporting cycle with more than 550 jurisdictions reporting every year. 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 ongoing requirement to report prevents regression into inequitable compensation practices and reduces sex-based wage disparities in public employment throughout Minnesota.

Ensuring Compliance

A. Pay Equity Rule Adopted

In 1991, the Legislature authorized MMB to adopt rules under the Administrative Procedures Act to assure compliance with the LGPEA.

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 assists local governments through extensive training, consulting, and analyzing their pay equity reports.

MMB regularly communicates through various means with the approximately 1,700 local government jurisdictions required to comply with the law. The department has produced numerous technical assistance publications available at no cost to the jurisdictions.

MMB has periodically offered training sessions and delivered presentations at various conferences. MMB has also developed instructional material 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. As part of our continuous improvement efforts, we have made several enhancements to the program since that time.

Section Two Tests for Compliance

Pay Inequity

A complete description of the tests for compliance and the specific actions MMB recommends to each jurisdiction to achieve compliance can be found in the [appendix](#) of this report.

Inequities exist when females are paid less than males even though their job evaluation ratings indicated that the females should be paid at least equal to the males, and when the jurisdiction cannot account for the disparities by length of service or performance differences.

For example, when a female in the position of city clerk-treasurer rating of 275 points, is paid less than a male in a public works/maintenance position with a rating of 213 points, there is an inequity between city clerks and maintenance workers.

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

Examples of Pay Inequity

Position	Job Points	Class Type	Hourly Wage "Out of Compliance"	Hourly Wage "In Compliance"	Difference
Clerk-Treasurer	275	Female	\$16.00	\$17.34	\$1.34
Public Works/Maintenance	213	Male	\$17.34	----	

Position	Job Points	Class Type	Min Monthly Salary	Max Monthly Salary	Years to Max Salary
Plant Maintenance	260	Male	\$3,007.00	\$4,750.00	11
Teacher	282	Female	\$3,270.83	\$5,468.75	30

Summary of Tests Failed After Initial Analysis

The following is a summary of 535 reports submitted by jurisdictions for the reporting year 2021. 169 or 31% of the reports were initially found out of compliance. Below is a breakdown of each test:

Test	Number of Jurisdictions Failing
Completeness and Accuracy Test	98
Statistical Analysis Test	31
Alternative Analysis Test	13
Salary Range Test	21
Exceptional Service Pay Test	5
Two or more tests	1
Total	169

Section Three

Summary of Compliance Status of Local Governments

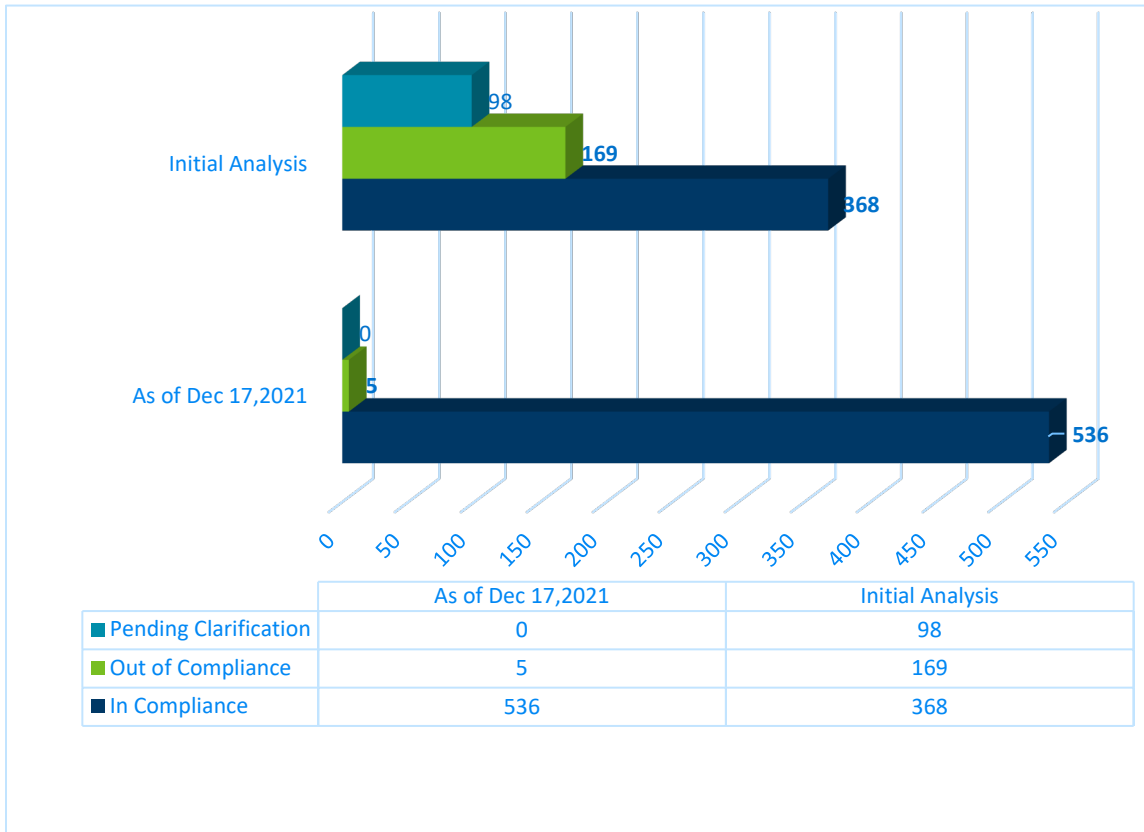
2021 Summary of Compliance Status by Jurisdictional Type as of December 17, 2021- Pay Equity Database for Local Governments

Jurisdiction Type	In Compliance	Out of Compliance	Total	% In Compliance
Cities	234	3	237	98%
Counties	28	0	28	100%
Schools	121	0	121	100%
Soil & Water Conservation Districts	27	1	28	96%
Other Districts	55	0	55	100%
Housing and Redevelopment Authorities	27	0	27	100%
Townships	21	1	22	95%
Utilities	15	0	15	100%
Health Care Facilities	8	0	8	100%
TOTAL	536	5	541	99%

Compliance Status of 2021 Reports

In January 2021, there were 541 local governments required to submit a report to MMB. The following chart depicts progress-to-date.

Status of Reports as of December 17, 2021



Section Four

Jurisdictions Not in Compliance

Jurisdictions Not in Compliance – First Notice of Non-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.

Jurisdiction	Test Failed*	Est. Monthly Cost to Achieve Compliance	Cost as % of Payroll
Cities			
Beardsley	CA	*	*
Middle River	CA	*	*
Stacy	CA	*	*
Townships			
Fair Haven	CA	*	*
SWCD	CA	*	*
East Polk	CA	*	*

*The abbreviations for the tests for compliance used in this section can be found on page 17. 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 Six - Appendix](#) of this report.

- CA – Completeness and Accuracy

*Unable to estimate monthly cost to achieve compliance because reports were not submitted.

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.

Jurisdictions Not in Compliance – Penalties Resolved

MMB has resolved a total of 96 penalty cases over the past 20 years resulting in \$1,267,851 in total restitution paid to approximately 1,300 employees for past inequities. The state has collected a total of \$210, 233 in penalty fees. The penalty fees go to the general fund and not to MMB. There were no penalties assessed in 2021.

Section Five

Jurisdictions in Compliance

Cities

Afton	Chandler	Fairfax	Jeffers	Northfield	Spring Lake
Albany	Chanhassen	Fergus Falls	Jenkins	Oak Grove	Park
Albertville	Chisholm	Finlayson	Jordan	Okabena	Spring Valley
Alexandria	City of Aitkin	Foley	Kandiyohi	Olivia	Stephen
Alpha	City of Hadley	Forest Lake	Kellogg	Osakis	Stewartville
Altura	Claremont	Foreston	Kenyon	Osseo	Storden
Amboy	Clarissa	Franklin	Kinney	Otsego	Taylor's Falls
Arco	Clear Lake	Fulda	La Prairie	Ottertail	Tonka Bay
Argyle	Clearbrook	Gary	Lake Benton	Palisade	Tracy
Audubon	Clearwater	Gaylord	Lakefield	Pequot Lakes	Twin Valley
Austin	Cloquet	Geneva	Lakeland	Perham	Two Harbors
Bagley	Coates	Gilbert	Lamberton	Pierz	Tyler
Balaton	Comfrey	Gilman	Lancaster	Pillager	Ulen
Baudette	Conger	Glenville	Lewisville	Pine River	Underwood
Baxter	Corcoran	Gonvick	Littlefork	Pipestone	Upsala
Bayport	Crookston	Goodhue	Lonsdale	Plummer	Vernon Center
Bellechester	Crosby	Goodridge	Luverne	Plymouth	Vesta
Belview	Crosslake	Goodview	Lynd	Proctor	Waldorf
Bemidji	Danube	Grand Meadow	Madelia	Ramsey	Walnut Grove
Benson	Dawson	Green Isle	Madison	Red Wing	Walters
Bertha	De Graff	Greenfield	Madison Lake	Renville	Warren
Big Lake	Deephaven	Grey Eagle	Mahnomen	Richfield	Watertown
Bigfork	Deerwood	Grygla	Maple Grove	Robbinsdale	Waterville
Birchwood	Delavan	Hallock	Maple Lake	Rochester	Watson
Village	Detroit Lakes	Hamburg	Maplewood	Roseau	Waverly
Bird Island	Dodge Center	Hancock	Marietta	Roseville	Welcome
Biscay	Donnelly	Harris	Marshall	Rothsay	Westbrook
Biwabik	Eagle Lake East	Hartland	McGregor	Royalton	White Bear
Bovey	Bethel	Hastings	McIntosh	Rushford	Lake
Boyd	East Grand	Hayward	Medina	Rushmore	Williams
Brandon	Forks	Heron Lake	Menahga	Ruthton	Wilmont
Brewster	East Gull Lake	Hilltop	Mendota	Sauk Centre	Winnebago
Brownsdale	Eden Prairie	Hoffman	Heights	Scandia	Wolf Lake
Butterfield	Elbow Lake	Hokah	Milaca	Scanlon	Wolverton
Callaway	Elko New	Holdingsford	Minneapolis	Shelly	Worthington
Calumet	Market	Holland	Minnesota Lake	Shorewood	Wyoming
Canton	Elysian	Isanti	Minnetrissa	Silver Lake	Zumbro Falls
Carlos	Emily	Jackson	Mound	Slayton	
Cass Lake	Emmons	Janesville	Nashwauk	South Haven	
Center City	Erhard	Jasper	Newport		

School Districts

ISD No. 2908 Brandon-Evansville Public Schools
 ISD No. 108 - Norwood
 ISD No. 115 - Cass Lake-Bena Schools
 ISD No. 116 - Pillager
 ISD No. 12 - Centennial
 ISD No. 129 - Montevideo
 ISD No. 138 - North Branch Area Schools
 ISD No. 139 - Rush City
 ISD No. 15 - St. Francis
 ISD No. 162 - Bagley
 ISD No. 200 - Hastings
 ISD No. 203 - Hayfield
 ISD No. 204 - Kasson- Mantorville
 ISD No. 2071 - Lake Crystal-Welcome Memorial Schools
 ISD No. 2135 - Maple River
 ISD No. 2137 - Kingsland Public Schools
 ISD No. 2149 - Minnewaska Area Schools
 ISD No. 2159 - Buffalo Lake- Hector
 ISD No. 2164 - Dilworth- Glyndon-Felton
 ISD No. 2165 - Hinckley- Finlayson
 ISD No. 2167 - Lakeview
 ISD No. 2168 - NRHEG
 ISD No. 2169 - Murray County Central
 ISD No. 2171 - Kittson Central
 ISD No. 22 - Detroit Lakes
 ISD No. 2215 - Norman County East
 ISD No. 227 - Chatfield
 ISD No. 2342 - West Central
 ISD No. 2358 - Tri County
 ISD No. 2365 - GFW Schools
 ISD No. 242 - Alden-Conger
 ISD No. 2527 - Norman County West
 ISD No. 2580 - East Central
 ISD No. 261 - Ashby
 ISD No. 264 - Herman-Norcross
 ISD No. 2689 - Pipestone- Jasper
 ISD No. 270 - Hopkins
 ISD No. 273 - Edina
 ISD No. 276 - Minnetonka
 ISD No. 281 - Robbinsdale
 ISD No. 2835 - Janesville- Waldorf-Pemberton
 ISD No. 2854 - Ada-Borup Public Schools
 ISD No. 2860 - Blue Earth Area Schools
 ISD No. 2889 - Lake Park- Audubon
 ISD No. 2890 - Renville County West
 ISD No. 2895 - Jackson County Central Schools
 ISD No. 2899 - Plainview- Elgin-Millville
 ISD No. 2903 - Ortonville
 ISD No. 294 - Houston
 ISD No. 306 - Laporte
 ISD No. 31 - Bemidji
 ISD No. 317 - Deer River
 ISD No. 330 - Heron Lake- Okabena
 ISD No. 345 - New London- Spicer
 ISD No. 347 - Willmar
 ISD No. 356 - Lancaster
 ISD No. 36 - Kelliher
 ISD No. 363 - So. Koochiching/ Rainy River
 ISD No. 4 - McGregor
 ISD No. 402 - Hendricks
 ISD No. 403 - Ivanhoe
 ISD No. 404 - Lake Benton
 ISD No. 413 - Marshall
 ISD No. 414 - Minneota
 ISD No. 423 - Hutchinson
 ISD No. 432 - Mahnommen
 ISD No. 447 - Grygla/Gatzke
 ISD No. 463 - Eden Valley Watkins
 ISD No. 482- Little Falls
 ISD No. 484 - Pierz
 ISD No. 486 - Swanville
 ISD No. 508 - St. Peter
 ISD No. 511 - Adrian
 ISD No. 531 - Byron
 ISD No. 534 - Stewartville
 ISD No. 553 - New York Mills
 ISD No. 561 - Goodridge
 ISD No. 564 - Thief River Falls
 ISD No. 578 - Pine City
 ISD No. 592 - Climax-Shelly
 ISD No. 593 - Crookston
 ISD No. 599 - Fertile-Beltrami
 ISD No. 6 - South St. Paul
 ISD No. 600 - Fisher
 ISD No. 601 - Fosston
 ISD No. 630 - Red Lake Falls
 ISD No. 659 - Northfield

ISD No. 671 - Hills- Beaver Creek

ISD No. 676 - Badger

ISD No. 700 - Hermantown

ISD No. 707 - Nett Lake

ISD No. 709 - Duluth

ISD No. 712 - Mountain Iron- Buhl

ISD No. 717 - Jordan

ISD No. 719 - Prior Lake- Savage

ISD No. 727 - Big Lake

ISD No. 728 - Elk River

ISD No. 742 - St. Cloud

ISD No. 761 - Owatonna

ISD No. 763 - Medford

ISD No. 77 - Mankato

ISD No. 771 - Chokio-Alberta

ISD No. 801 - Browns Valley

ISD No. 803 - Wheaton

ISD No. 820 - Sebeka

ISD No. 829 - Waseca

ISD No. 834 - Stillwater

ISD No. 837 - Madelia

ISD No. 840 - St. James

ISD No. 846 - Breckenridge

ISD No. 850 - Rothsay

ISD No. 891 - Canby

ISD No. 91 - Barnum

ISD No. 911 - Cambridge-Isanti

ISD No. 914 - Ulen-Hitterdal

ISD No. 99 - Esko

St. Louis Park Public Schools

Southwest Metro Intermediate District 288

Soil Water and Conservation Districts

Benton County SWCD
Blue Earth County SWCD
Clay SWCD
Clearwater SWCD
Crow Wing SWCD
Dakota County SWCD
Douglas SWCD
Freeborn SWCD
Hubbard County SWCD
MAHNOMEN COUNTY SWCD
Martin SWCD
McLeod SWCD

Mille Lacs SWCD
Nicollet SWCD
Nobles SWCD
Pipestone County SWCD
Red Lake County SWCD
Rice SWCD
Root River SWCD
Sherburne SWCD
Sibley County SWCD
Steele County SWCD
Swift County SWCD
West Ottertail SWCD
Wilkin SWCD
Winona County SWCD

Townships

Franklin Township
Ideal Township
Joint Powers Board Cascade/Rochester Township
Krain Township
LaGrand Township
Laketown Township
Linwood Township
Maple Lake Township
Marysville Township
Middleville Township
Northern Township
Oaklawn Township
Pokegama Township
Rockford Township
Shingobee Township

Gilmanton
Silver Creek Township
Solway Township
South Bend Township
Stanford Township
White Township
York Township

Utilities

Alexandria Light & Power
Austin Utilities
Bagley Public Utilities Commission
Bovey-Coleraine Water & Wastewater Commission
Elk River Municipal Utilities
Farwell Kensington Sanitary District
Grand Rapids Public Utilities Commission
Madelia Municipal Light & Power
Marshall & Polk Rural Water System
Blue Earth County
Carlton County

Moorhead Public Service
Moose Lake Water and Light Commission
Owatonna Public Utilities
Sauk Centre Public Utilities
Wells Public Utilities
Western Lake Superior Sanitary District

Counties

Chisago County
Clay County

Dakota County
Faribault County
Freeborn County
Houston County
Jackson County
Kandiyohi County
Kittson County
Koochiching County
Le Sueur County
Mille Lacs County
Pennington County
Ramsey County

Red Lake County
Rice County
Roseau County
Stevens County
Swift County
Traverse County
Wabasha County
Washington County
Watonwan County
Winona County
Wright County

Health Care Facilities

CCM Health
Cook-Orr Health Care District
Douglas County Hospital
Heritage Living Center
Lakewood Health System

Ortonville Area Health Service
Sleepy Eye Medical Center
Swift County Benson Hospital

Housing & Redevelopment Authorities

Austin HRA
Barnesville HRA
Bemidji HRA
Big Stone County HRA
Carver County CDA
Chisholm HRA
Cloquet HRA
Duluth HRA
Hibbing HRA
International Falls HRA
Koochiching County Housing & Redevelopment Authority
Luverne HRA
Minneapolis Public Housing Authority

Mora HRA
Morrison County HRA
Mountain Lake HRA
North Mankato HRA
Northwest Multi-County HRA
Pequot Lakes HRA
Pine River HRA
Red Lake Falls HRA
Redwood Falls HRA
SE Minnesota Multi-County HRA
Sleepy Eye HRA
Tracy HRA
Warren HRA
Worthington HRA

Other

Arrowhead Library System
Arrowhead Regional Development Commission
Bemidji Regional Interdistrict Council
Carnelian Marine St. Croix Watershed District
Clear Lake/Clearwater Sewer Authority
Dakota Communications Center
Des Moines Valley Health and Human Services
Duluth Entertainment & Convention Center Authority
East Central Regional Development Commission
East Central Solid Waste Commission
Forest Lake Cable Commission
Great River Regional Library
Horizon Public Health
Human Services of Faribault and Martin Counties
Intermediate District 287
Kitchigami Regional Library
Lac Qui Parle-Yellow Bank Watershed District
Marshall-Lyon County Library
Metro Mosquito Control District
Metronet
Metropolitan Airports Commission
Mid-Minnesota Development Commission
Minnehaha Creek Watershed District
Minnesota Sports Facilities Authority
Minnesota State High School League
Nine Mile Creek Watershed District
Northern Lights Library Network (NLLN)
Northwest Regional Development Commission
Northwest Regional Inter-District Council No. 382-
Okabena-Ocheda Watershed District
Pelican River Watershed District
Pine to Prairie Cooperative Center
Prairieland Solid Waste Management - Joint County
Prior Lake - Spring Lake Watershed District
Ramsey-Washington Metro Watershed District
Ramsey/Washington Co. Suburban Cable Commission
Redwood-Cottonwood Rivers Control Area
Region Nine Development Commission
Region V Computer Service
Resource Training and Solutions
Rice/Steele Consolidated PSAP
River Bend Education District #6049
Sauk River Watershed District
Scott County Community Development Agency (CDA)
South Central Service Cooperative
South Lake Minnetonka Police Department
South Washington Watershed District
Southeast Service Cooperative
Southern Plains Education Cooperative
Southwest Transit Commission
St. Paul Public Housing Agency
Traverse des Sioux Library System
Two Rivers Watershed District
Viking Library System
Washington County CDA

Section Six

Appendix – Compliance Tests

Below is a summary of the tests that we conduct to determine compliance. The “recommended action” is a brief overview of the general advice MMB gives to jurisdictions that did not pass a particular test. MMB creates individualized reports for each jurisdiction which identifies specific problems and requirements to pass the compliance test(s). (See [Minnesota Rules Chapter 3920](#) for details on each test.)

Alternative Analysis T-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.*

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.*

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.*

Salary Range Test (SR) - compares the average number of years it takes for 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.*

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.*