



January 2023

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

Table of Contents

Executive Summary.....	3
About This Report.....	4
Section One Background Information	5
Requirements of the Law.....	5
Ensuring Compliance.....	5
Section Two Tests for Compliance.....	6
Pay Inequity	6
Examples of Pay Inequity.....	6
Summary of Tests Failed After Initial Analysis.....	7
Section Three Summary of Compliance Status of Local Governments	8
Compliance Status of 2022 Reports.....	9
Section Four Jurisdictions Not in Compliance	10
Jurisdictions Not in Compliance – First Notice of Non-Compliance	10
Jurisdictions Not in Compliance – Second Notice of Non-Compliance	10
Jurisdictions Not in Compliance – Penalties Resolved.....	10
Section Five Jurisdictions in Compliance	11
Cities.....	11
School Districts.....	13
Soil Water and Conservation Districts	14
Townships	14
Utilities	15
Counties	16
Health Care Facilities.....	16
Housing & Redevelopment Authorities	16
Other	17
Appendix – Compliance Tests.....	17

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 2022, 556 local governments were required to submit reports to MMB. As of December 15, 2022, a total of 556 (100%) of the jurisdictions were in compliance.

About This Report

Minnesota Management and Budget staff prepared the 2022 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 2022.

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

Questions? Contact Dori Leland at 651-335-4085

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 Pay Equity 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 556 reports submitted by jurisdictions for the reporting year 2022. 177 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	141
Statistical Analysis Test	9
Alternative Analysis Test	6
Salary Range Test	14
Exceptional Service Pay Test	5
Two or more tests	2
Total	177

Section Three

Summary of Compliance Status of Local Governments

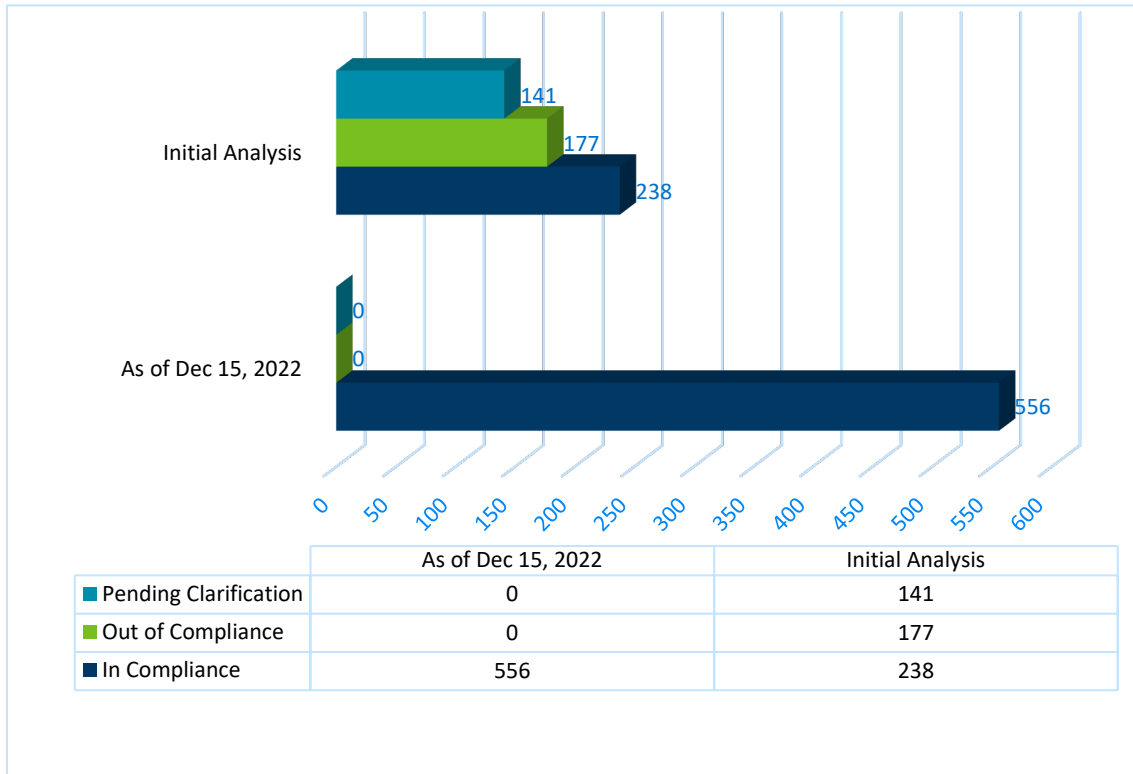
2022 Summary of Compliance Status by Jurisdictional Type as of December 15, 2022- Pay Equity Database for Local Governments

Jurisdiction Type	In Compliance	Out of Compliance	Total	% In Compliance
Cities	268	0	268	100%
Counties	25	0	25	100%
Schools	98	0	98	100%
Soil & Water Conservation Districts	23	0	23	100%
Other Districts	42	0	42	100%
Housing and Redevelopment Authorities	25	0	25	100%
Townships	52	0	52	100%
Utilities	15	0	15	100%
Health Care Facilities	8	0	8	100%
TOTAL	556	0	556	100%

Compliance Status of 2022 Reports

In January 2022, there were 556 local governments required to submit a report to MMB. The following chart depicts progress-to-date.

Status of Reports as of December 15, 2022



Section Four

Jurisdictions Not in Compliance

Jurisdictions Not in Compliance – First Notice of Non-Compliance

At this time, all jurisdictions that received a first notice of non-compliance have achieved compliance with the Local Government Pay Equity Act.

Tests for compliance can be found in section VI, beginning on page 18. 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.

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 2022.

Section Five

Jurisdictions in Compliance

Cities

Adrian	City of Whalan	Glenwood	Lake City
Akeley	Cleveland	Good Thunder	Lake Lillian
Alvarado	Clitherall	Graceville	Lakeland Shores
Andover	Clontarf	Granite Falls	Lanesboro
Annandale	Cold Spring	Grant	Laporte
Anoka	Cologne	Greenbush	LaSalle
Appleton	Columbia Heights	Greenwald	Le Center
Askov	Columbus	Greenwood	Lengby
Atwater	Comstock	Grove City	Leonard
Aurora	Coon Rapids	Gully	LeRoy
Badger	Cosmos	Halstad	Lester Prairie
Barrett	Cottage Grove	Hanska	Lewiston
Battle Lake	Crystal	Harding	Lino Lakes
Beaver Bay	Currie	Hawley	Lismore
Becker	Danvers	Hector	Litchfield
Belgrade	Darfur	Heidelberg	Little Falls
Belle Plaine	Dellwood	Hendrum	Long Beach
Bethel	Dilworth	Herman	Long Prairie
Big Falls	Donaldson	Hermantown	Lowry
Blackduck	Dunnell	Hibbing	Mabel
Blaine	Eagan	Hill City	Mankato
Bloomington	Easton	Hills	Mantorville
Bock	Eden Valley	Hinckley	Maple Plain
Borup	Edgerton	Holloway	Mapleview
Breckenridge	Edina	Holt	Maynard
Bricelyn	Effie	Hopkins	McKinley
Brownton	Elgin	Houston	Medford
Bruno	Elk River	Ihlen	Melrose
Buckman	Ellendale	Independence	Mendota
Buhl	Ellsworth	Inver Grove Heights	Miesville
Burnsville	Eyota	Iron Junction	Milroy
Caledonia	Fairmont	Isle	Miltona
Canby	Federal Dam	Johnson	Minneiska
Carver	Fifty Lakes	Karlstad	Minnetonka
Champlin	Floodwood	Kasota	Montgomery
Chaska	Florence	Kelliher	Morgan
Chatfield	Forada	Kensington	Motley
Chickamaw Beach	Fosston	Kent	Mounds View
Chokio	Fountain	Kerkhoven	Mountain Lake
Circle Pines	Freeport	Kerrick	Nashua
City of Denham	Fridley	Kingston	Nevis
City of Princeton	Frost	La Crescent	New Brighton
City of Rice Lake	Genola	Lafayette	New Hope

New London	Quamba	Solway	Vergas
New Trier	Randolph	South St. Paul	Verndale
New Ulm	Ranier	Spicer	Vining
Newfolden	Raymond	Spring Hill	Waconia
Nicollet	Red Lake Falls	St. Anthony	Wadena
North Branch	Remer	St. Anthony Village	Waite Park
North Mankato	Rice	St. Bonifacius	Wanamingo
North Oaks	Richmond	St. Clair	Warroad
Northome	Richville	St. Cloud	Waseca
Odessa	Riverton	St. Francis	Wayzata
Oklee	Rock Creek	St. Hilaire	West Concord
Orono	Rockville	St. James	West St. Paul
Ostrander	Roscoe	St. Paul Park	Villard
Owatonna	Rosemount	St. Peter	Wheaton
Park Rapids	Round Lake	St. Vincent	Windom
Pelican Rapids	Rushford Village	Starbuck	Winona
Pemberton	Russell	Stewart	Winsted
Perley	Rutledge	Stillwater	Winthrop
Peterson	Sacred Heart	Sunburg	Winton
Pine City	Savage	Sunfish Lake	Wood Lake
Plainview	Sebeka	Swanville	Woodstock
Plato	Shoreview	Taopi	Wright
Preston	Silver Bay	Trail	Zemple
Prinsburg	Sleepy Eye	Truman	Zimmerman

School Districts

ISD No. 241 - Albert Lea
ISD No. 206- Alexandria
ISD No. 11 - Anoka-Hennepin
ISD No. 2396 - Atwater-Cosmos-Grove City
ISD No. 492 - Austin
ISD No. 726 - Becker
ISD No. 716 - Belle Plaine
ISD No. 32 – Blackduck
ISD No. 756 - Blooming Prairie
ISD No. 271 – Bloomington
ISD No. 181 - Brainerd
ISD No. 286 - Brooklyn Center
ISD No. 93 - Carlton
ISD No. 695 - Chisholm
ISD No. 13 - Columbia Heights
ISD No. 81 – Comfrey
ISD No. 95 - Cromwell-Wright
ISD No. 466 - Dassel-Cokato
ISD No. 879 - Delano
ISD No. 533 - Dover-Eyota
ISD No. 595 - East Grand Forks
ISD No. 112 - Eastern Carver County Schools
ISD No. 272 - Eden Prairie
ISD No. 696 – Ely
ISD No. 2752 - Fairmont Area
ISD No. 2198 - Fillmore Central
ISD No. 14 - Fridley
ISD No. 2859 - Glencoe- Silver Lake
ISD No. 253 – Goodhue
ISD No. 318 - Grand Rapids
ISD No. 316 – Greenway
ISD No. 150- Hawley
ISD No. 768 - Hancock
ISD No. 738 – Holdingford
ISD No. 2687-Howard Lake- Waverly-Winsted
ISD No. 361 - International Falls
ISD No. 473 - Isle
ISD No. 2172 – Kenyon - Wanamingo
ISD No. 2853 - Lac Qui Parle Valley School
ISD No. 813 - Lake City
ISD No. 381 - Lake Superior
ISD No. 857 - Lewiston-Altura
ISD No. 415 - Lynd
ISD No. 238 - Mabel-Canton
ISD No. 2180 – Maccray
ISD No. 832 – Mahtomedi
ISD No. 881 - Maple Lake
ISD No. 2448 - Martin County West
ISD No. 740 - Melrose
ISD No. 2711 - Mesabi East
ISD No. 1A – Minneapolis
ISD No. 2769 - Morris
ISD No. 173 - Mountain Lake
ISD No. 308 – Nevis
ISD No. 507 – Nicollet
ISD No. 916 - Northeast Metro
ISD No. 279 – Osseo
ISD No. 741- Paynesville
ISD No. 309 - Park Rapids
ISD No. 186 - Pequot Lakes
ISD No. 549 - Perham
ISD No. 704 - Proctor
ISD No. 2906-Red Lake County Central
ISD No. 256 - Red Wing
ISD No. 535 – Rochester
ISD No. 750 – ROCORI
ISD No. 917 – Rosemount
ISD No. 623 - Roseville
ISD No. 485 – Royalton
ISD No. 2902 - Russell-Tyler- Ruthton
ISD No. 743 - Sauk Centre
ISD No. 720 – Shakopee

ISD No. 2310 - Sibley East Schools
ISD No. 84 - Sleepy Eye
ISD No. 833 - South Washington County Schools
ISD No. 500 – Southland
ISD No. 297 - Spring Grove
ISD No. 16 - Spring Lake Park
ISD No. 282 - St. Anthony- New Brighton
ISD No. 75 - St. Clair
ISD No. 2142 - St. Louis County
ISD No. 885 - St. Michael- Albertville
ISD No. 625- St.Paul

ISD No. 2904 - Tracy Area Public Schools
ISD No. 2905 - Tri-City United
ISD No. 550 – Underwood
ISD No. 487 - Upsala
ISD No. 640 – Wabasso
ISD No. 113 – Walker- Hackensack- Akeley
ISD No. 2176- Warren-Alvarado-Oslo
ISD. No. 110 - Waconia Public Schools
ISD No. 2155 - Wadena- Deer Creek
ISD No. 197 - West St. Paul
ISD No. 2898 - Westbrook- Walnut Grove

Soil Water and Conservation Districts

Chippewa County SWCD
Chisago SWCD
East Otter Tail SWCD
Fillmore 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
Renville County SWCD
Scott County SWCD
South St. Louis SWCD
Traverse SWCD
Wabasha County SWCD
Wadena SWCD
Waseca SWCD
West Polk SWCD

Townships

Baldwin Township
Balkan Township
Ball Bluff Township
Beaver Creek Township
Beaver Township
Belgrade Township
Biwabik Township
Blackberry Township
Camden Township
Clearwater Township
Cokato Township

Corinna Township
Farm Island Township
Franconia Township
Glen Township
Great Scott Township
Harris Township
Idun Township
Isanti Township
Kimberly Township
Lafayette Township
Lakeside Township

Livonia Township
Logan Township
Macville Township
Malmo Township
Mankato Township
May Township
Maywood
Millward Township
Millwood Township
Monticello Township
Morrison Township
Mountain Lake Township
New Haven Township
Nordland Township
Paynesville Township

Perch Lake Township
Pike Bay Township
Pine City Township
Pliny Township
Princeton Township
Scandia Valley Township
Silver Creek Township
Spencer Township
St. George
Stillwater Township
Sverdrup Township
Thomson Township
Victor Township
Waconia Township
White Bear Township

Utilities

Alexandria Lake Area Sanitary District
Babbitt Public Utilities Commission
Blue Earth Light & Water
Delano Municipal Utilities
Glencoe Light & Power Commission
Hibbing Public Utilities
Kenyon Municipal Utilities
Lakefield Public Utilities
Marshall Municipal Utilities
New Ulm Public Utilities
Otter Tail Water Management District
Princeton Public Utilities
Proctor Public Utilities Commission
Sleepy Eye Public Utilities
Westbrook Public Utilities

Counties

Anoka County
Becker County
Benton County
Big Stone County
Carver County
Cass County Administration
Clearwater County
Cook County
Dodge County
Goodhue County
Grant County
Hennepin County
Lac qui Parle County

Lake County
Martin County
Nicollet County
Norman County
Olmsted County
Polk County
Redwood County
Rock County
Scott County
Wadena County
Waseca County
Yellow Medicine County

Health Care Facilities

Appleton Area Health Services
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 & 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
St. Peter HRA
Thief River Falls HRA
Virginia HRA
Walker HRA
Windom HRA
Winona HRA

Other

Anoka-Champlin Fire Department
Area Special Education Cooperative
Arrowhead Regional Computing Consortium
Arrowhead Regional Corrections
Benton/Stearns Education District #6383
Bois de Sioux Watershed District
Centennial Lakes Police Department
Central MN Educational Research &
Development Council
Duluth Airport Authority
Duluth Seaway Port Authority
East Range Public Safety
Fergus Falls Area Special Ed Coop No. 935
Freshwater Education District #6004
Jackson County Library
Metro ECSU
Metropolitan Council

Metropolitan Library Service Agency (MELSA)
Midwest Special Ed Interdistrict Cooperative
Minneapolis Municipal Building Commission
Minneapolis Parks and Recreation Board
Minnesota Valley Cooperative Center
Mississippi Headwaters Board
Mississippi Watershed Management
Organization
Northfield Area Fire and Rescue Service
Northwest Regional Library
Northwest Service Cooperative
Pioneerland Library System
Praelands Library Exchange
Region 5 Development Commission
Region I Information Management Services
Rice Creek Watershed District
Southwest & West Central Service Cooperative

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.*