



February 3, 2025

Senator Tou Xiong
Senate State and Local Government Committee
3203 Minnesota Senate Bldg.
St. Paul, MN 55155

Senator Andrew Lang
Senate State and Local Government Committee
2205 Minnesota Senate Bldg.
St. Paul, MN 55155

Representative Ginny Klevorn
House State Government Committee
5th Floor, Centennial Office Building
St. Paul, MN 55155

Representative Jim Nash
House State Government Committee
2nd Floor, Centennial Office Building
St. Paul, MN 55155

Dear Senators and Representatives:

Minnesota Statute (M.S.) 471.999 directs Minnesota Management and 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 Erik Anderson at erik.anderson@state.mn.us or (651) 201-8030.

Sincerely,

A handwritten signature in black ink that reads 'Erin M. Campbell'.

Erin Campbell
Commissioner

Enclosures

cc: Eric Nauman
Emily Adriaens
Andrew Erickson
Helen Roberts

January 2025

Minnesota Local Government Pay Equity Compliance Report

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

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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 2024, 545 local governments were required to submit reports to MMB. As of January 8, 2025, a total of 541 (99%) of the jurisdictions were in compliance. The pay equity coordinator position remained vacant from early August 2024 until late November 2024. Since the position has been filled, the new staff member has been actively working with jurisdictions to ensure compliance. Many jurisdictions experienced staff turnover during this period and were not aware of the requirement to report until recently.

About This Report

Minnesota Management and Budget staff prepared the 2024 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 2024.

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

Contact Dori Leland at 651-335-4085 with questions.

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 a 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 Minnesota Rules Chapter 3920 (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 545 reports submitted by jurisdictions for the reporting year 2024. The data show 194, or 36%, 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	160
Statistical Analysis Test	6
Alternative Analysis Test	13
Salary Range Test	12
Exceptional Service Pay Test	2
Two or more tests	1
Total	194

Section Three

Summary of Compliance Status of Local Governments

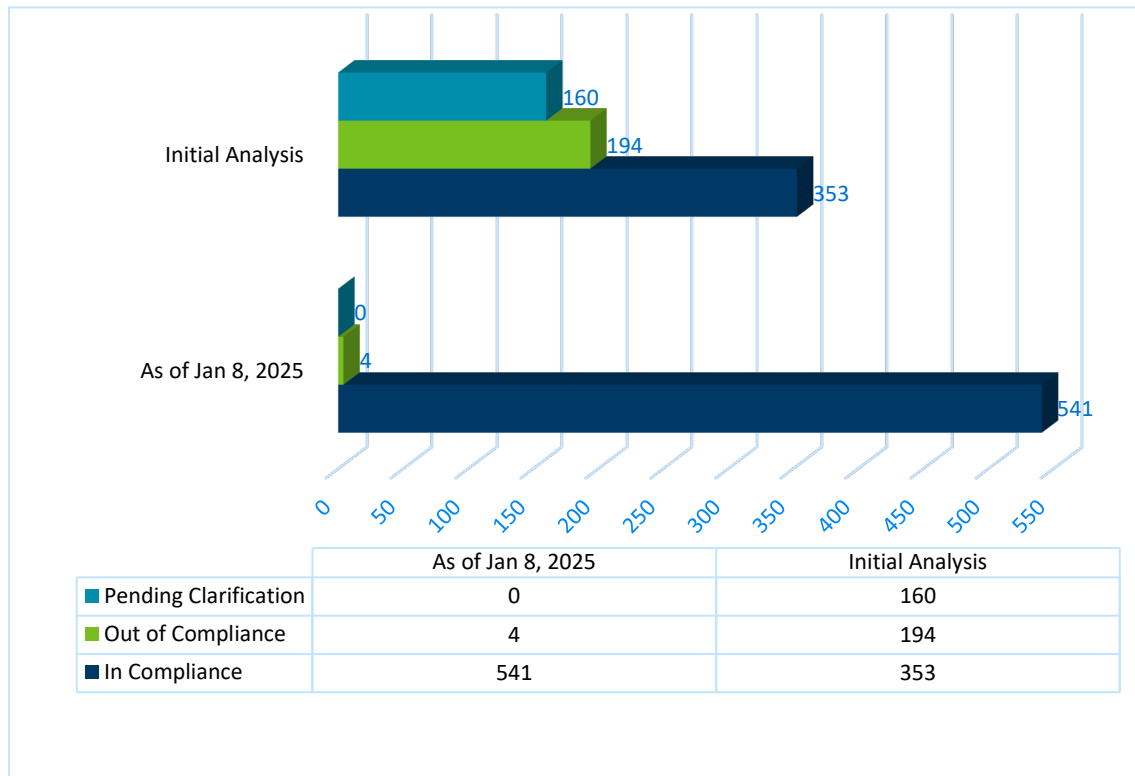
2024 Summary of Compliance Status by Jurisdictional Type as of January 8, 2025—Pay Equity Database for Local Governments

Jurisdiction Type	In Compliance	Out of Compliance	Total	% In Compliance
Cities	242	2	244	99%
Counties	26	0	26	100%
Schools	124	1	125	99%
Soil & Water Conservation Districts	28	0	28	100%
Other Districts	53	1	54	98%
Housing and Redevelopment Authorities	27	0	27	100%
Townships	18	0	18	100%
Utilities	16	0	16	100%
Health Care Facilities	7	0	7	100%
TOTAL	541	4	545	99%

Compliance Status of 2024 Reports

In January 2024, there were 545 local governments required to submit a report to MMB. The following chart depicts progress-to-date.

Status of Reports as of January 8, 2025



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 date 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			
Goodridge	CA	N/A	N/A
Holland	CA	N/A	N/A
School Districts			
ISD No. 482 - Little Falls	CA	N/A	N/A
Other			
Duluth Entertainment & Convention Center Authority	CA	N/A	N/A

PLEASE NOTE: The cities of Goodridge and Holland are actively working on their reports and will make submissions by the end of January 2025. ISD No. 482 – Little Falls will submit its report after it receives approval from its board meeting on February 10, 2025. Duluth Entertainment and Convention Center Authority is training new staff to complete the report and will submit it in February.

*The abbreviations for the tests for compliance and the specific actions MMB recommended to each jurisdiction can be found in [Appendix – Compliance Tests](#), page 18.

Jurisdictions Not in Compliance – Second Notice of Non-Compliance

Currently 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 2024.

Section Five

Jurisdictions in Compliance

Cities

Ada	Canton	Emmons	Jordan
Afton	Carlos	Fairfax	Kandiyohi
Aitkin	Cass Lake	Fergus Falls	Kellogg
Albany	Center City	Finlayson	Kenyon
Albertville	Chandler	Foley	Kinney
Alexandria	Chanhassen	Forest Lake	La Prairie
Alpha	Chisholm	Foreston	Lake Benton
Altura	City of Hadley	Franklin	Lakefield
Amboy	Claremont	Fulda	Lamberton
Arco	Clarissa	Gary	Lancaster
Argyle	Clearbrook	Gaylord	Lewisville
Audubon	Clearwater	Gilbert	Littlefork
Austin	Cloquet	Gilman	Lonsdale
Bagley	Coates	Glenville	Luverne
Balaton	Comfrey	Gonvick	Lynd
Baudette	Conger	Goodhue	Madelia
Baxter	Corcoran	Goodview	Madison
Bayport	Crookston	Grand Meadow	Madison Lake
Bellechester	Crosby	Green Isle	Mahnomen
Belview	Crosslake	Greenfield	Maple Grove
Bemidji	Danube	Grey Eagle	Maple Lake
Benson	Dawson	Grygla	Maplewood
Bertha	De Graff	Hamburg	Marietta
Big Lake	Deephaven	Hancock	Marshall
Bigfork	Deerwood	Harris	McGregor
Birchwood Village	Delavan	Hartland	McIntosh
Bird Island	Dennison	Hastings	Meadowlands
Biscay	Detroit Lakes	Hayward	Medina
Biwabik	Dodge Center	Heron Lake	Menahga
Blue Earth	Donnelly	Hilltop	Mendota Heights
Bovey	Eagle Lake	Hoffman	Middle River
Boyd	East Bethel	Hokah	Milaca
Brainerd	East Grand Forks	Holdingford	Minneapolis
Brandon	East Gull Lake	Isanti	Minnesota Lake
Brewster	Eden Prairie	Jackson	Minnetrista
Brownsdale	Elbow Lake	Janesville	Montrose
Butterfield	Elko New Market	Jasper	Moose Lake
Callaway	Elysian	Jeffers	Mound
Calumet	Emily	Jenkins	Nashwauk

New Munich	Richfield	Spring Valley	Waldorf
Newport	Robbinsdale	Springfield	Walnut Grove
Northfield	Rochester	Spring Grove	Walters
Oak Grove	Rockford	Spring Valley	Warba
Okabena	Rose Creek	St. Augusta	Warren
Olivia	Roseau	St. Charles	Watertown
Osakis	Roseville	St. Paul	Waterville
Osseo	Rothsay	Stephen	Watson
Otsego	Royalton	Stewartville	Waverly
Ottertail	Rushford	Storden	Welcome
Pequot Lakes	Rushmore	Taylor Falls	Westbrook
Perham	Ruthton	Tintah	White Bear Lake
Pierz	Sabin	Tonka Bay	Williams
Pillager	Sauk Centre	Tracy	Wilmont
Pine River	Scandia	Trosky	Winnebago
Pipestone	Scanlon	Twin Valley	Wolf Lake
Plummer	Shelly	Tyler	Wolverton
Plymouth	Shorewood	Ulen	Worthington
Proctor	Silver Lake	Underwood	Wyoming
Ramsey	Slayton	Upsala	Zumbro Falls
Red Wing	South Haven	Vernon Center	
Renville	Spring Lake Park	Vesta	

School Districts

ISD No. 2910 - Ada Borup Public Schools	ISD No. 12 - Centennial
ISD No. 511 - Adrian	ISD No. 227 - Chatfield
ISD No. 242 - Alden - Conger	ISD No. 771 - Chokio -Alberta
ISD No. 261 - Ashby	ISD No. 592 - Climax -Shelly
ISD No. 676 - Badger	ISD No. 593 – Crookston
ISD No. 162 - Bagley	ISD No. 317 - Deer River
ISD No. 91 - Barnum	ISD No. 22 - Detroit Lakes
ISD No. 31 - Bemidji	ISD No. 2164 - Dilworth -Glyndon -Felton
ISD No. 727 - Big Lake	ISD No. 709 - Duluth
ISD No. 2860 - Blue Earth Area Schools	ISD No. 2580 - East Central
ISD No. 314 - Braham	ISD No. 463 - Eden Valley Watkins
ISD No 2908 - Brandon Evansville Public Schools	ISD No 581 - Edgerton
ISD No. 846 - Breckenridge	ISD No. 273 - Edina
ISD No. 787 - Browerville	ISD No. 728 - Elk River
ISD No. 801 - Browns Valley	ISD No. 99 - Esko
ISD No. 2159 - Buffalo Lake -Hector- Stewart	ISD No. 599 - Fertile – Beltrami
ISD No. 531 - Byron	ISD No. 600 - Fisher
ISD No. 911 - Cambridge -Isanti	ISD No. 601- Fosston
ISD No. 891 - Canby	
ISD No. 115 - Cass Lake-Bena Schools	

ISD No. 505 - Fulda
ISD No. 2365 - GFW Schools
ISD No. 561 – Goodridge
ISD No 447 – Grygla/Gatzke
SD No. - 200 Hastings
ISD No. - 203 Hayfield
ISD No. - 402 Hendricks
ISD No. 264 - Herman - Norcross
ISD No. 700 - Hermantown
ISD No. 330 - Heron Lake - Okabena
ISD No. 671 - Hills -Beaver Creak
ISD No. 2165 - Hinckley - Finlayson
ISD No. 270 - Hopkins
ISD No. 294 - Houston
ISD No. 423 - Hutchinson
ISD No. 403 - Ivanhoe
ISD No. 2895 - Jackson County Central Schools
ISD No. 2835 - Janesville- Waldorf-Pemberton
ISD No. 717 - Jordan
ISD No. 36 - Kelliher
ISD No. 2137 - Kingsland Public Schools
ISD No. 2171 - Kittson Central
ISD No. 300- LaCrescent-Hokah
ISD No. 404 - Lake Benton
ISD No. 2071 - Lake Crystal Welcome Memorial
School
ISD No. 2167 – Lakeview
ISD No. 356 - Lancaster
ISD No. 306 - Laporte
ISD No. 837 - Madelia
ISD No. 432 - Mahnomon
ISD No. 77 - Mankato
ISD No. 2135 - Maple River
ISD No. 413 – Marshall
ISD No. 763 - Medford
ISD No. 4 - McGregor
ISD No. 414 - Minneota
ISD No. 276 - Minnetonka
ISD No. 2149 - Minnewaska Area Schools
ISD No. 129 - Montevideo

ISD 332 - Mora Public Schools
ISD No. 712 - Mountain Iron - Buhl
ISD No. 707 - Nett Lake
ISD No. 345 - New London - Spicer
ISD No. 553 - New York Mills
ISD No. 2215 - Norman County East
ISD No. 138 - North Branch Area Schools
ISD No. 659 - Northfield
ISD No.6076 - Northland Learning Center
ISD No. 108 - Norwood
ISD No. 2168 - NRHEG
ISD No. 761 – Owatonna
ISD No. 2903 - Ortonville
ISD No. 484 – Pierz
ISD No. 116 - Pillager
ISD No. 578 - Pine City
ISD No. 2689 - Pipestone Area Schools
ISD No. 2899 - Plainview - Elgin- Millville
ISD No. 719 - Prior Lake- Savage
ISD No. 630 - Red Lake Falls
ISD No. 2890 - Renville County West
ISD No. 281 - Robbinsdale
ISD No. 682 - Roseau
ISD No. 850 - Rothsay
ISD No. 139 - Rush City
ISD No 287 – School for Unique Learners
ISD No. 820 - Sebeka
ISD No. 363 - So. Koochiching/ Rainy River
ISD No. 6 - South St. Paul
ISD No. 288 – Southwest Metro
ISD No. 742 - St. Cloud
ISD No. 15 - St. Francis
ISD No. 840 - St. James
ISD No. 2170 - Staples-Motley
St. Louis Park Public Schools
ISD No. 508 - St. Peter
ISD No. 534 - Stewartville
ISD No. 834 – Stillwater

ISD No. 486 - Swanville
ISD No. 564 - Thief River Falls
ISD No. 2358 - Tri County
ISD No. 2125 - Triton
ISD No. 914 - Ulen - Hitterdal

ISD No. 113 - Walker -Hackensack- Akeley
ISD No. 829 – Waseca
ISD No. 803 - Wheaton
ISD No. 347 - Willmar

Soil Water and Conservation Districts

Benton County SWCD
Blue Earth County SWCD
Clay SWCD
Clearwater SWCD
Crow Wing SWCD
Dakota County SWCD
Douglas SWCD
East Polk SWCD
Freeborn SWCD
Hubbard County SWCD
Mahnomen County SWCD
Martin SWCD
McLeod SWCD
Mille Lacs SWCD
Nicollet SWCD

Nobles SWCD
Pipestone County SWCD
Prairieland SWCD
Red Lake County SWCD
Rice SWCD
Root River SWCD
Sherburne SWCD
Sibley County SWCD
Steele County SWCD
Swift County SWCD
West Ottertail WWCD
Wilkin SWCD
Winona County SWCD

Townships

Franklin Township
Ideal Township
Joint Powers Board Cascade/Rochester
Township
Karin Township
LaGrand Township
Laketown Township
Linwood Township
Maple Lake Township
Marysville Township
Middleville Township
Northern Township
Oaklawn Township
Pokegama Township
Rockford Township
Silver Creek Township
Solway Township

Stanford 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
Moorhead Public Service
Owatonna Public Utilities
Ramsey-Washington Metro Watershed District
Sauk Centre Public Utilities
Sauk River Watershed District
Western Lake Superior Sanitary District
Wells Public Utilities Department

Counties

Blue Earth County	Pennington County
Carlton County	Ramsey County
Clay County	Red Lake County
Dakota County	Rice County
Faribault County	Roseau County
Freeborn County	Stevens County
Houston County	Swift County
Hubbard County	Traverse County
Jackson County	Wabasha County
Kandiyohi County	Washington County
Koochiching County	Watonwan County
Le Sueur County	Winona County
Mille Lacs 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

Housing & Redevelopment Authorities

Austin HRA
Barnesville HRA
Bemidji HRA
Big Stone Country 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
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 911
Des Moines Valley Health and Human Services
East Central Regional Development Commission
East Central Solid Waste Commission
Excelsior Fire District
Forest Lake Cable Commission
Great River Regional Library
Heron Lake Watershed District
Horizon Public Health
Human Services of Faribault and Martin Counties
Kitchigami Regional Library
L.O.G.I.S.

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
Moose Lake Water and Light Commission
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
Prior Lake - Spring Lake Watershed District

Ramsey/Washington Co. Suburban Cable
Commission
Ramsey-Washington Metro Watershed District
Rice/Steele Consolidated PSAP
Redwood-Cottonwood Rivers Control Area
Region Nine Development Commission
Region V Computer Service
Resource Training and Solutions
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
Southwest Transit Commission
St. Paul Public Housing Agency
Viking Library System
Washington County CDA

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 for which there is 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.*