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# Minnesota Local Government Pay Equity Compliance Report

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**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 2025, 551 local governments were required to submit reports to MMB. As October 1, 2025, a total of 551 of the jurisdictions were in compliance.

## About This Report

Minnesota Management and Budget staff prepared the 2025 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 2025.

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, on 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 with a 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 551 reports submitted by jurisdictions for the reporting year 2025.

152, or 28%, of the reports were initially found out of compliance. Below is a breakdown of each test:

Test	Number of Jurisdictions Failing
<b>Completeness and Accuracy Test</b>	130
<b>Statistical Analysis Test</b>	1
<b>Alternative Analysis Test</b>	10
<b>Salary Range Test</b>	7
<b>Exceptional Service Pay Test</b>	3
<b>Two or more tests</b>	1
<b>Total</b>	152

## Section Three

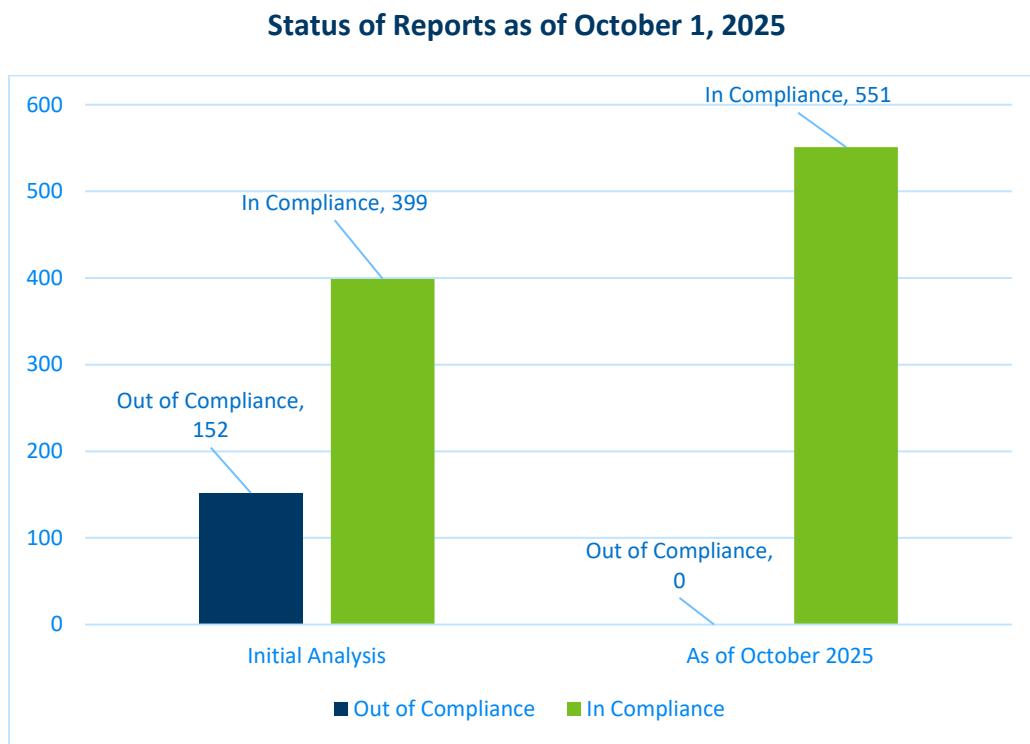
### Summary of Compliance Status of Local Governments

2025 Summary of Compliance Status by Jurisdictional Type as of October 1, 2025 - 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	94	0	94	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	7	0	7	100%
<b>TOTAL</b>	<b>551</b>	<b>0</b>	<b>551</b>	<b>100%</b>

## Compliance Status of 2025 Reports

In January 2025, 551 local governments were required to submit a report to MMB. The following chart depicts progress-to-date.



## 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.

A complete description of each of these tests and 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 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 2025.

## Section Five

### Jurisdictions in Compliance

#### Cities

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

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

## School Districts

ISD No. 241	Albert Lea	ISD No. 13	Columbia Heights
ISD No. 206	Alexandria	ISD No. 81	Comfrey
ISD No. 11	Anoka-Hennepin	ISD No. 95	Cromwell-Wright
ISD No. 2396	Atwater-Cosmos-Grove City	ISD No. 466	Dassel-Cokato
ISD No. 492	Austin	ISD No. 879	Delano
ISD No. 726	Becker	ISD No. 533	Dover-Eyota
ISD No. 716	Belle Plaine	ISD No. 595	East Grand Forks
ISD No. 32	Blackduck	ISD No. 112	Eastern Carver County Schools
ISD No. 756	Blooming Prairie	ISD No. 272	Eden Prairie
ISD No. 271	Bloomington	ISD No. 696	Ely
ISD No. 181	Brainerd	ISD No. 2752	Fairmont Area
ISD No. 286	Brooklyn Center	ISD No. 2198	Fillmore Central
ISD No. 93	Carlton	ISD No. 14	Fridley
ISD No. 695	Chisholm	ISD No. 2859	Glencoe-Silver Lake

ISD No. 253	Goodhue	ISD No. 2906	Red Lake County Central
ISD No. 318	Grand Rapids	ISD No. 256	Red Wing
ISD No. 316	Greenway	ISD No. 535	Rochester
ISD No. 768	Hancock	ISD No. 750	ROCORI
ISD No. 738	Holdingford	ISD No. 917	Rosemount
ISD No. 2687	Howard Lake-Waverly-Winsted	ISD No. 623	Roseville
ISD No. 361	International Falls	ISD No. 485	Royalton
Intermediate School District 916-Northeast Metro		ISD No. 2902	Russell-Tyler-Ruthhton
ISD No. 473	Isle	ISD No. 743	Sauk Centre
ISD No. 2172	Kenyon- Wanamingo	ISD No. 720	Shakopee
ISD No. 2853	Lac Qui Parle Valley School	ISD No. 2310	Sibley East Schools
ISD No. 813	Lake City	ISD No. 84	Sleepy Eye
ISD No. 381	Lake Superior	ISD No. 833	South Washington County Schools
ISD No. 857	Lewiston-Altura	ISD No. 500	Southland
ISD No. 415	Lynd	ISD No. 297	Spring Grove
ISD No. 238	Mabel-Canton	ISD No. 16	Spring Lake Park
ISD No. 2180	MACCRAY	ISD No. 282	St. Anthony-New Brighton
ISD No. 832	Mahtomedi	ISD No. 75	St. Clair
ISD No. 881	Maple Lake	ISD No. 2142	St. Louis County
ISD No. 2448	Martin County West	ISD No. 885	St. Michael-Albertville
ISD No. 740	Melrose	ISD No. 2904	Tracy Area Public Schools
ISD No. 2711	Mesabi East	ISD No. 2905	Tri-City United
ISD No. 1A	Minneapolis	ISD No. 550	Underwood
ISD No. 2769	Morris	ISD No. 487	Upsala
ISD No. 173	Mountain Lake	ISD No. 640	Wabasso
ISD No. 88	New Ulm	ISD No. 2155	Wadena-Deer Creek
ISD 308 - Nevis		ISD No. 197	West St. Paul
ISD No. 507	Nicollet	ISD No. 2898	Westbrook
ISD No. 279	Osseo	ISD No. 277	Westonka
ISD No. 309	Park Rapids	ISD No. 577	Willow River
ISD No. 741	Paynesville	ISD No. 100	Wrenshall
ISD No. 186	Pequot Lakes	ISD No. 2190	Yellow Medicine East
ISD No. 549	Perham		
ISD No. 704	Proctor		

## Soil Water and Conservation Districts

Chippewa County SWCD	Marshall County SWCD
Chisago SWCD	Meeker SWCD
East Otter Tail SWCD	Morrison SWCD
Fillmore SWCD	Murray County SWCD
Isanti SWCD	Norman County SWCD
Koochiching SWCD	North St. Louis SWCD
Lake of the Woods SWCD	Pennington SWCD
Le Sueur County SWCD	Renville County SWCD

Scott County SWCD  
 South St. Louis SWCD  
 Traverse Soil and Water Conservation District  
 Wabasha County SWCD

Wadena SWCD  
 Waseca SWCD  
 West Polk SWCD

## **Townships**

Arbo Township	Isanti Township	Paynesville Township
Balkan Township	Kimberly Township	Perch Lake Township
Ball Bluff Township	Lafayette Township	Pike Bay Township
Beaver Creek Township	Lakeside Township	Pine City Township
Beaver Township	Livonia Township	Pliny Township
Belgrade Township	Logan Township	Princeton Township
Biwabik Township	Macville Township	Scandia Valley Township
Blackberry Township	Malmo Township	Silver Creek Township
Camden Township	Mankato Township	Spencer Township
Clearwater Township	May Township	St. George
Cokato Township	Maywood	Stillwater Township
Corinna Township	Millward Township	Sverdrup Township
Farm Island Township	Millwood Township	Thomson Township
Franconia Township	Monticello Township	Victor Township
Glen Township	Morrison Township	Waconia Township
Great Scott Township	Mountain Lake Township	White Bear Township
Harris Township	New Haven	
Idun Township	Nordland Township	

## **Utilities**

Alexandria Lake Area Sanitary District  
Babbitt Public Utilities Commission  
Blue Earth Light & Water  
Capitol Region Watershed District  
Delano Municipal Utilities  
Glencoe Light & Power Commission  
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	Lake County
Becker County	Martin County
Benton County	Nicollet County
Big Stone County	Norman County
Carver County	Olmsted County
Cass County Administration	Polk County
Clearwater County	Redwood County
Cook County	Rock County
Dodge County	Scott County
Goodhue County	Wadena County
Grant County	Waseca County
Hennepin County	Yellow Medicine County
Lac qui Parle County	

## **Health Care Facilities**

Appleton Area Health  
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  
BrightWorks (formerly Metro ECSU)  
Centennial Lakes Police Department  
Central MN Educational Research & Development Coun  
Duluth Airport Authority  
Duluth Seaway Port Authority  
East Range Public Safety  
Fergus Falls Area Special Education Coop No. 935  
Freshwater Education District #6004  
Jackson County Library  
Metropolitan Council  
Metropolitan Library Service Agency (MELSA)  
Midwest Special Education Interdistrict Cooperative  
Minneapolis Municipal Building Commission  
Minneapolis Parks and Recreation  
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  
Prairielands Library Exchange  
Region 5 Development Commission  
Region I Information Management Services  
Rice Creek Watershed District  
Southwest & West Central Service Cooperative  
Southwest Health and Human Services  
Southwest Prairie Technical Service Area  
St. Cloud Area Planning Organization  
St. Cloud Metropolitan Transit Commission  
St. Paul Port Authority  
Three Rivers Park District  
Waseca-Le Sueur Regional Library  
West Metro Fire-Rescue District  
Wright Technical Center District 0966  
Yellow Medicine River Watershed District

## 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 that identify 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.*