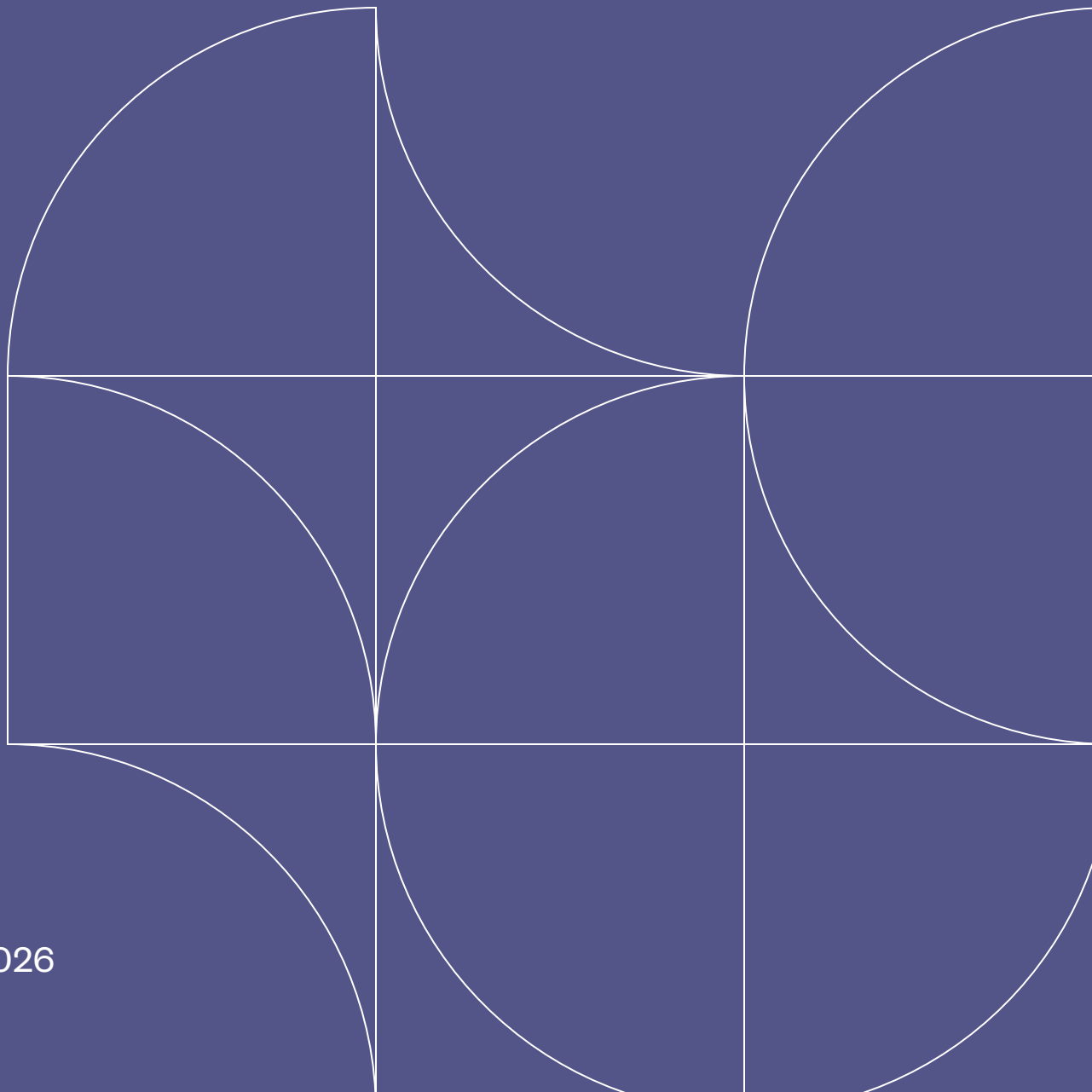




Pay Transparency Wage Range Disclosure Compendium



MARCH 2026

Current Laws

| Jurisdiction | To Whom? | Timing | What Must be Provided | Effective Date |
|--------------------------|------------------------|---|---|---|
| CA California | Applicants + Employees | On job posting and upon applicant and/or employee's request. | <p>"Pay scale," which means the good faith estimate of the salary or hourly wage range that the employer reasonably expects to pay for the position upon hire.</p> <p>Record Retention Requirement: Must maintain records of a job title and wage rate history for each employee for the duration of the employment plus three years after the end of the employment in order for the Labor Commissioner to determine if there is still a pattern of wage discrepancy. These records shall be open to inspection by the Labor Commissioner. Any demographic information gathered for the purpose of submitting pay data reports—such as race, ethnicity, and sex—must be stored separately from personnel records.</p> | Jan. 1, 2023 Amendments effective Jan. 1, 2026 |
| CO Colorado | Applicants + Employees | <p>On job opportunity notification.</p> <p>Job Opportunity Notices: To all Colorado employees on the same calendar day and prior to the date on which the employer makes a selection decision.</p> <p>Post-Selection Notices: Within 30 calendar days after a candidate who is selected to fill a job opportunity begins working in the position.</p> | <p>Employer must in good faith disclose the following in the notification of each job opportunity: (1) the hourly or salary compensation or the range of the hourly or salary compensation; (2) a general description of the benefits and other compensation applicable to the job opportunity; (3) the date the application window is anticipated to close; and (4) how to apply for the job opportunity.</p> <p>Job Opportunity Notices: Employers must make reasonable efforts to announce, post, or otherwise make known each job opportunity to all Colorado employees. "Job opportunity" means "a current or anticipated vacancy for which the employer is considering a candidate or candidates or interviewing a candidate or candidates or that the employer externally posts." "Job opportunity" does not include career development or career progression. If an employer is only physically located outside of Colorado and has fewer than fifteen employees working in Colorado, all of whom work only remotely, then, through July 1, 2029, the employer is only required to provide notice of remote job opportunities.</p> <p>Post-Selection Notices: Employer must make reasonable efforts to announce, post, or otherwise make known the following information to, at a minimum, the Colorado employees with whom the employer intends the selected candidate to work with regularly: (1) the name of the candidate selected for the job opportunity; (2) the selected candidate's former job title if selected while already employed by the employer; (3) the selected candidate's new job title; and (4) information on how employees may demonstrate interest in similar job opportunities in the future, including identifying individuals or departments to whom the employees can express interest in similar job opportunities.</p> <p>Career Progression Notices: For positions with "career progression," an employer shall disclose and make available to all eligible Colorado employees the requirements for career progression, in addition to each position's terms of compensation, benefits, full-time or part-time status, duties, and access to further advancement. "Career progression" means a regular or automatic movement from one position to another based on time in a specific role or other objective metrics.</p> | Jan. 1, 2024 |
| CT Connecticut | Applicants + Employees | <p>Applicants: Upon earliest of (1) applicant's request; or (2) prior to or at the time of an offer of compensation.</p> <p>Employees: Upon (1) hire; (2) change in employee's position; or (3) employee's first request.</p> | Wage range, which means the range of wages the employer anticipates relying on when setting wages for a position and may include reference to: (1) any applicable pay scale; (2) previously determined range of wages for the position; (3) actual range of wages for those employees currently holding comparable positions; or (4) the employer's budgeted amount for the position. | Oct. 1, 2021 |

| Jurisdiction | To Whom? | Timing | What Must be Provided | Effective Date |
|--|------------------------|--|--|----------------|
| DE Delaware (eff. Sept. 26, 2027) | Applicants + Employees | <p>On job posting (external and internal).</p> <p>If an external or internal posting for the job opportunity has not been made available to an applicant, must provide: (1) prior to any offer or discussion of compensation; and (2) at the applicant's request.</p> | <p>Employer must disclose: (1) the hourly or salary compensation or the hourly or salary compensation range; and (2) a general description of the benefits and other compensation applicable to the job opportunity. "Hourly or salary compensation range" means "the minimum to maximum pay range for the position, set in good faith by reference to any applicable pay scale, the previously determined range for the position, the actual range of others currently holding equivalent positions, or the budgeted amount for the position, as applicable." The breadth of the hourly or salary compensation range provided is one factor relevant to the analysis of whether an employer has complied in good faith with this section.</p> <p><u>For job opportunities paid on a commission basis</u>, in whole or in part, the employer must disclose the fact that the position is paid on a commission basis and need not disclose the compensation or compensation range.</p> <p><u>For tipped jobs</u>, the employer must disclose the fact that the position is paid on a tipped basis and must disclose the base wage or range of base wages for the opportunity.</p> <p><u>For jobs covered by a collective bargaining agreement ("CBA")</u>, the employer must disclose the compensation or compensation range that has been approved for disclosure under the CBA. However, the law only applies to CBA-covered opportunities where the CBA is executed, amended, modified, renewed, or replaced after September 26, 2027.</p> <p><u>Exemption:</u> Temporary, interim, or acting job opportunities that require an immediate hire. In such circumstances, employers need not disclose compensation and benefits information in the job opportunity notification. However, employer would likely still need to disclose compensation and benefits information prior to any offer or discussion of compensation and at any time at the applicant's request.</p> | Sept. 26, 2027 |
| DC District of Columbia | Applicants + Employees | <p>In all job listings and position descriptions advertised.</p> <p>If not provided in disclosures, prospective employee may inquire about such disclosures.</p> | <p>In Job Listing: Minimum and maximum projected salary or hourly pay. In stating the minimum and maximum salary or hourly pay for the position, the range shall extend from the lowest to the highest salary or hourly pay that the employer in good faith believes at the time of the posting it would pay for the advertised job, promotion, or transfer opportunity.</p> <p>To Prospective Employees: Disclose to prospective employees the existence of healthcare benefits that employees may receive before the first interview. The law does not define "first interview." Also, if disclosures not provided in the job listing, the prospective employee may inquire about such disclosures.</p> <p>Workplace Notice: Employer shall post a notice in its workplace notifying employees of their rights under the Act. Notice must be posted in a conspicuous place in at least one location where employees congregate.</p> | June 30, 2024 |
| HI Hawaii | Applicants | <p>On job listing.</p> <p>But not on job listings for: (1) positions that are internal transfers or promotions with a current employer; (2) public employee positions for which salary, benefits, or other compensation are determined pursuant to collective bargaining; or (3) positions with employers having fewer than fifty employees.</p> | Hourly rate or salary range reasonably reflecting the actual expected compensation. | Jan. 1, 2024 |

| Jurisdiction | To Whom? | Timing | What Must be Provided | Effective Date |
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| IL Illinois | Applicants + Employees | <p>In any job posting for positions that (1) will be physically performed, at least in part, in Illinois; or (2) will be physically performed outside of Illinois, but the employee reports to a supervisor, office, or other work site in Illinois.</p> <p>If a public or internal posting for the job, promotion, transfer, or other employment opportunity has not been made available to the applicant, must disclose (1) prior to any offer or discussion of compensation; and (2) at the applicant's request.</p> <p>Notice of promotional opportunities must be made no later than 14 calendar days after the employer makes an external job posting for the position.</p> | <p>Pay scale and benefits for a position. "Pay scale and benefits" means the wage or salary, or the wage or salary range, and a general description of the benefits and other compensation, including, but not limited to, bonuses, stock options, or other incentives the employer reasonably expects in good faith to offer for the position, set by reference to any applicable pay scale, the previously determined range for the position, the actual range of others currently holding equivalent positions, or the budgeted amount for the position, as applicable. The inclusion of a hyperlink to a publicly viewable webpage that includes the pay scale and benefits satisfies the requirements for inclusion. Posting of a relevant and up to date general benefits description in an easily accessible, central, and public location on an employer's website and referring to this posting in the job posting shall be deemed to satisfy the benefits posting requirement.</p> <p>Promotional Opportunity Notice Requirement: Employer must announce, post, or otherwise make known all opportunities for promotion to all current employees no later than 14 calendar days after the employer makes an external job posting for the position, except for positions in the State of Illinois workforce designated as exempt from competitive selection.</p> <p>Recordkeeping: Employer must make and preserve records that document the name, address, and occupation of each employee, the wages paid to each employee, the pay scale and benefits for each position, the job posting for each position, and any other information the Director may by rule deem necessary and appropriate for enforcement of this Act.</p> | Jan. 1, 2025 |
| MA Massachusetts | Applicants + Employees | <p>In the posting of the position.</p> <p>Applicants: Upon request.</p> <p>Employees: Must disclose to an employee (1) who is offered a promotion or transfer to a new position with different job responsibilities; and (2) upon request.</p> | <p>Pay range. "Pay range" means the annual salary range or hourly wage range that the employer reasonably and in good faith expects to pay for such position at that time.</p> | Oct. 29, 2025 |
| MD Maryland | Applicants + Employees | <p>On each public or internal posting for each position for work that will be physically performed, at least in part, in the State.</p> <p>If a public or internal posting for each position was not made available to an applicant for the position, must disclose: (1) before a discussion of compensation is held with the applicant; and (2) at any other time on request of the applicant.</p> | <p>The wage range and a general description of benefits and any other compensation offered for the position. "Wage range" means the minimum and maximum hourly rate or minimum and maximum salary for a position, set in good faith by reference to: (1) any applicable pay scale; (2) any previously determined minimum and maximum hourly rate or minimum and maximum salary for the position; (3) the minimum and maximum hourly rate or minimum and maximum salary of an individual holding a comparable position at the time of the posting; or (4) the budgeted amount for the position.</p> <p>The Commissioner shall develop and make available to employers a form that an employer may use to comply with the disclosure requirements.</p> <p>Recordkeeping Requirement: Employer shall keep a record of compliance for each position for at least 3 years after: (1) the position is filled; or (2) if the position is not filled, the position was initially posted.</p> | Oct. 1, 2024 |

| Jurisdiction | To Whom? | Timing | What Must be Provided | Effective Date |
|--|------------------------|--|---|----------------|
| MN Minnesota | Applicants + Employees | In each posting for each job opening with the employer. | The starting salary range, and a general description of all of the benefits and other compensation, including but not limited to any health or retirement benefits, to be offered to a hired job applicant. If the employer does not plan to offer a salary range, it must list a fixed pay rate. "Salary range" means the minimum and maximum annual salary or hourly range of compensation, based on the employer's good faith estimate, for a job opportunity of the employer at the time of the posting for such opportunity. | Jan. 1, 2025 |
| NV Nevada | Applicants + Employees | Applicants: Upon completion of an interview for a position. Employees: For promotion or transfer to a new position if the employee has (1) applied for the promotion or transfer; (2) completed an interview for the promotion or transfer or been offered the promotion or transfer; and (3) requested the wage or salary range or rate for the promotion or transfer. | Wage or salary range or rate. | Oct. 1, 2021 |
| NJ New Jersey | Applicants + Employees | In each posting for new jobs and transfer opportunities that are advertised by the employer either externally or internally. Promotional Opportunity Notification: Prior to making a promotion decision. | Employer must disclose in each posting the hourly wage or salary, or a range of the hourly wage or salary, and a general description of benefits and other compensation programs for which the employee would be eligible. Employer not prohibited from increasing the wages, benefits and compensation identified in the job opening posting at the time of making an offer for employment to an applicant. Promotional Opportunity Notification: Employer must make reasonable efforts to announce, post, or otherwise make known opportunities for promotion that are advertised internally within the employer or externally on internet-based advertisements, postings, printed flyers, or other similar advertisements to all current employees in the affected department or departments of the employer's business prior to making a promotion decision. Any promotion for a current employee that is awarded on the basis of years of experience or performance shall not be subject to these notification requirements. Employer not prohibited from making a promotion on an emergent basis due to an unforeseen event. | June 1, 2025 |
| NJ New Jersey (Jersey City) | Applicants + Employees | On a posting or advertisement that provides notice of employment opportunities, transfers, or promotions. | Minimum and maximum annual salary or hourly wage. In stating the minimum and maximum annual salary or hourly wage for a position, the range may extend from the lowest to the highest salary the employer in good faith believes at the time of the posting it would pay for the advertised job, promotion, or transfer opportunity. | July 6, 2022 |
| NY New York State | Applicants + Employees | In an advertisement for a job, promotion, or transfer opportunity that will physically be performed, at least in part, in the state of New York, including a job, promotion, or transfer opportunity that will physically be performed outside of New York but reports to a supervisor, office, or other work site in New York. | Must disclose: (1) the compensation or a range of compensation for such job, promotion, or transfer opportunity; and (2) the job description for such job, promotion, or transfer opportunity, if such description exists. For jobs, promotions, or transfer opportunities paid solely on commission, must disclose in writing in a general statement that compensation shall be based on commission. | Sept. 17, 2023 |

| Jurisdiction | To Whom? | Timing | What Must be Provided | Effective Date |
|--|------------------------|---|--|---|
| NY New York (Albany County) | Applicants + Employees | On advertisement for a job, promotion or transfer opportunity. | Minimum and maximum salary or hourly wage. In stating the minimum and maximum salary or hourly wage for a position, the range may extend from the lowest to highest salary the employer in good faith believes at the time of the posting it would pay for the advertised job, promotion, or transfer opportunity. | Mar. 9, 2023 |
| NY New York (Ithaca) | Applicants + Employees | On advertisement for a job, promotion, or transfer opportunity. | Minimum and maximum hourly or salary compensation. In stating the minimum and maximum hourly or salary compensation for a position, the range may extend from the lowest to the highest hourly or salary compensation the employer in good faith believes at the time of the posting it would pay for the advertised job, promotion, or transfer opportunity. | Sept. 1, 2022 |
| NY New York (NYC) | Applicants + Employees | On advertisement for a job, promotion, or transfer opportunity. | Minimum and maximum annual salary or hourly wage. In stating the minimum and maximum annual salary or hourly wage for a position, the range may extend from the lowest to the highest annual salary or hourly wage the employer in good faith believes at the time of the posting it would pay for the advertised job, promotion, or transfer opportunity. | Nov. 1, 2022 |
| OH Ohio (Cincinnati) | Applicants | Upon reasonable request, after a conditional offer of employment. | Pay scale (undefined). | Mar. 12, 2020 |
| OH Ohio (Cleveland) | Applicant | In job posting. | Requires employers to provide the salary range or scale for potential employment in the notification, advertisement, or other formal posting that offers the opportunity to apply for employment. | Oct. 27, 2025 |
| OH Ohio (Columbus) (eff. Jan. 1, 2027) | Applicants | In employment postings. | A reasonable salary range or scale for potential employment. The reasonableness of a salary range or scale shall be based on factors specific to the available position including, but not limited to: (1) the flexibility of the employer's budget; (2) the anticipated range of experience job applicants may have; (3) the potential variation in the responsibilities of the position; (4) the opportunities for growth in and beyond the position; (5) the cost of living for the various locations in which an applicant may work; and (6) market research on comparable positions and salaries. | Jan. 1, 2027 |
| OH Ohio (Toledo) | Applicants | Upon reasonable request, after a conditional offer of employment. | Pay scale (undefined). | Jun. 25, 2020 |
| RI Rhode Island | Applicants + Employees | Applicants: Upon request. Employer should provide the wage range prior to discussing compensation. Employees: Upon (1) hire; (2) when employee moves into a new position; or (3) employee's request. | Wage range, which means: Applicants: The wage range the employer anticipates relying on in setting wages for the position and may include reference to any applicable pay scale, previously determined range of wages for the position, the actual range of wages for those currently holding equivalent positions, or the budgeted amount for the position, as applicable. Employees: May include reference to any applicable pay scale, previously determined range of wages for the position, or the range of wages for incumbents in equivalent positions, as applicable. | Jan. 1, 2023, but no civil penalties until Jan. 1, 2025 |

| Jurisdiction | To Whom? | Timing | What Must be Provided | Effective Date |
|-------------------------|------------------------|---|---|--|
| VT Vermont | Applicants + Employees | <p>In any advertisement of a Vermont job opening. "Advertisement" means written notice, in any format, of a specific job opening made available to potential applicants. "Advertisement" does not include (1) general announcements that notify potential applicants that employment opportunities may exist with the employer but do not identify any specific job openings; or (2) verbal announcements of employment opportunities that are made in person or on the radio, television or other electronic mediums.</p> <p>"Vermont job opening" and "job opening" mean any position of employment that is either (1) physically located in Vermont; or (2) a remote position that will predominately perform work for an office or work location that is physically located in Vermont. Also includes: (1) positions that are open to internal candidates or external candidates, or both; and (2) positions into which current employees of the employer can transfer or be promoted. "Vermont job opening" and "job opening" does not include a position that is physically located outside of Vermont and that performs work that is predominantly for one or more offices or work locations that are physically located outside of Vermont.</p> | <p>Compensation or range of compensation for the job opening. If job paid (in whole or in part) on a commission basis, must disclose that fact and need not disclose the compensation or range of compensation. If job paid on a tipped basis, must disclose that fact and the base wage or range of base wages for the job opening.</p> <p>"Range of Compensation" means the minimum and maximum annual salary or hourly wage for a job opening that the employer expects in good faith to pay for the advertised job at the time the employer creates the advertisement.</p> <p>"Base wage" means the hourly wage that an employer pays to a tipped employee and does not include any tips received by the employee. "Range of base wages" means the minimum and maximum base wages for a job opening that the employer expects in good faith to pay for the advertised job at the time the employer creates the advertisement.</p> | July 1, 2025 |
| WA Washington | Applicants + Employees | <p>In each posting for each job opening.</p> <p>Employees: Upon request after offer of internal transfer to a new position or promotion.</p> <p>Opportunity to Cure: Within 5 business days of receiving written notice of an allegedly non-compliant job posting.</p> | <p>In posting: Wage scale or salary range, and a general description of all of the benefits and other compensation to be offered to the hired applicant. Where the employer is offering only a fixed wage amount for the opening, the employer must disclose the fixed wage amount rather than a scale or range.</p> <p>Employees: Wage scale or salary range for the employee's new position. Where the employer is offering only a fixed wage amount for the new position or promotion, the employer must disclose the fixed wage amount rather than a scale or range.</p> | Jan. 1, 2023 Amendments effective July 27, 2025 |

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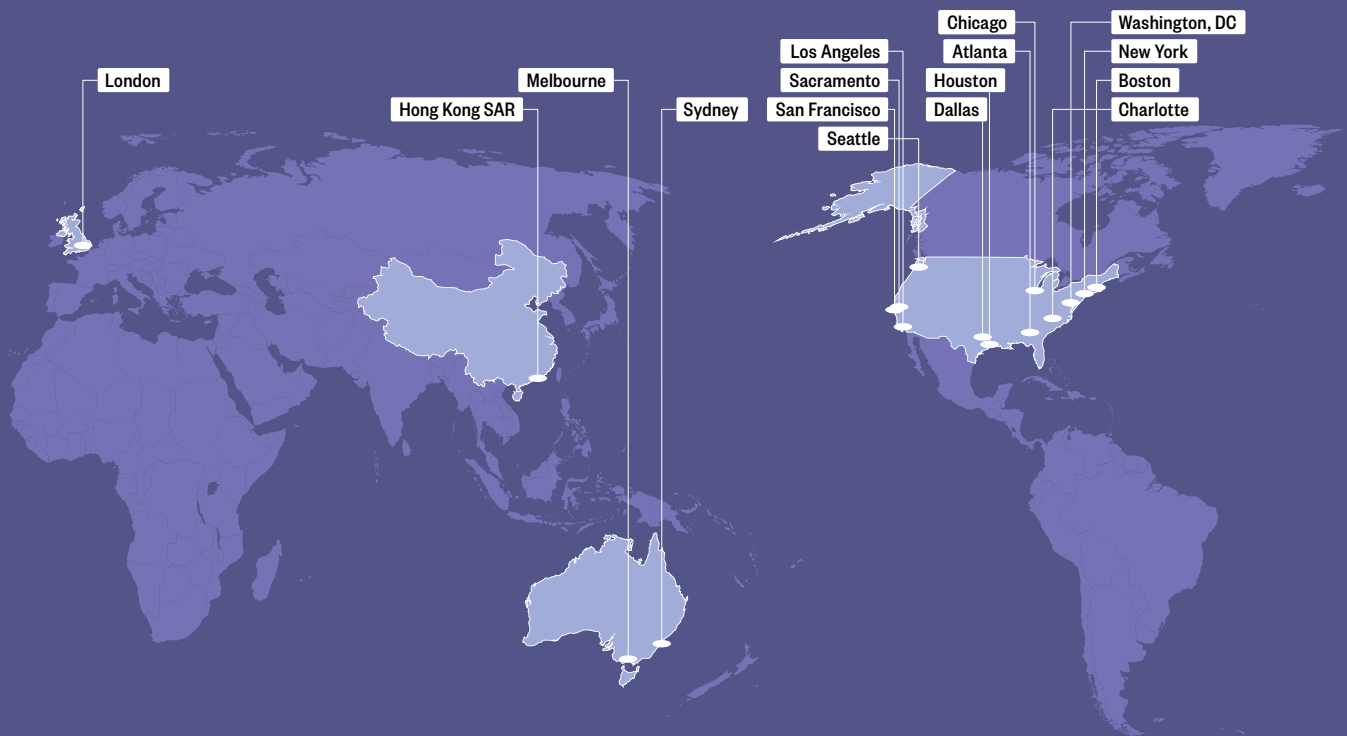
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Your needs serviced through an international model.

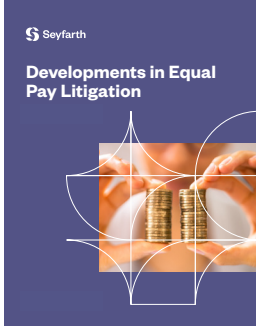
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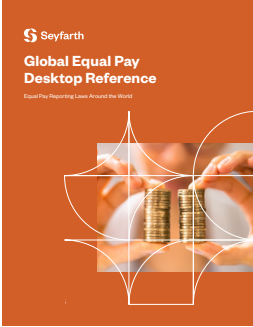
Additional Resources

Please use the below QR codes to access copies of each report on your mobile device.

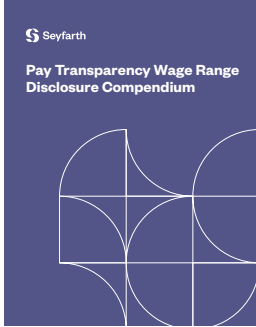
Developments in Equal Pay Litigation



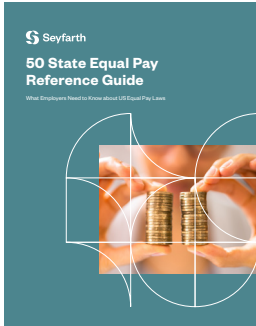
Global Equal Pay Desktop Reference



Pay Transparency Wage Range Disclosure Compendium



50 State Equal Pay Reference Guide



Equal Pay Issues & Insights Blog



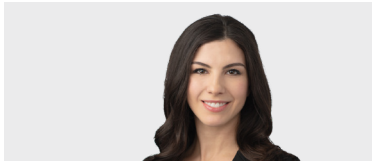
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Survey Center

For access to current materials on Equal Pay and Pay Transparency, Seyfarth clients can access the topics below on our Survey Center platform. Please reach out to your Seyfarth attorney for additional details.



Compensation Disclosure



Equal Pay Protected Classes and Permissible Factors for Differentials



Salary History: Prior Wage Inquiries and/or Verification



Mandated Annual Pay Reporting



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