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### **States That Added Pay Transparency Laws in 2025**

Joining states like [California, Colorado, Connecticut, New York, Washington, Hawaii, Maryland, Nevada, and others](#), several states enacted new pay transparency laws in 2025. Pay transparency laws require employers to disclose salary ranges and compensation details in job postings and during the hiring process. Here's a look at the states that have introduced pay transparency laws in 2025 and what these updates mean for employers.

#### **States with Pay Transparency Laws in 2025**

- **Minnesota**

Minnesota's new law requires employers with 30 or more employees at one or more sites within the state to include a pay range in job postings, along with a general description of benefits and other compensation (including health and retirement benefits). The law took effect on January 1, 2025. The law does not specify whether it applies to positions that will be worked outside of the state.

The law will be enforced by the Minnesota Department of Labor and Industry, along with the Attorney General. The law does not provide for a private right of action for employees or applicants.

- **Illinois**

Also beginning on January 1, 2025, Illinois now mandates that employers with 15 or more workers provide a wage scale and benefits description in all job postings. This law applies to positions where the employee will work in the state of Illinois or report to an Illinois worksite or supervisor.

An employer is also required to "announce, post, or otherwise make known" any external job posting to current employees who may be eligible to apply for the position as a promotion, within 14 days of the external posting being made available. The law does not clarify whether the obligation to notify current employees still applies if the position is filled within the 14-day period.

The Illinois Department of Labor is responsible for enforcement and the law does not provide for a private right of action for employees or applicants.

- **New Jersey**

Effective June 1, 2025, New Jersey now requires employers with 10 or more employees to disclose hourly wage or salary ranges, as well as benefits, in all internal and external job postings. This law applies to employers doing business, employing staff, or accepting applications within the state. Employers must also make reasonable efforts to announce promotional opportunities both internally and externally.

The New Jersey Commissioner of Labor and Workforce Development holds the exclusive authority to enforce these laws. There is no private right of action for employees or applicants.

- **Vermont**

Effective July 1, 2025, Vermont employers with 5 or more employees must include the salary or a range of compensation in all job postings (i.e., whether internal or external). Current employees also have the right to request (and be provided) the salary range of their position. This law applies to positions located in Vermont or “a remote position that will predominantly perform work for an office or work location that is physically located in Vermont.”

Vermont’s Attorney General enforces this law. The law does not provide for private right of action for employees or applicants.

- **Massachusetts**

The Massachusetts law takes effect in stages. As of February 2025, employers with 100 or more employees who are subject to federal EEO data reporting requirements are required to submit EEO-1 style reports augmented by pay data, to the Secretary of the Commonwealth.

These employers must submit all relevant components of their EEO-1 report, as issued by the U.S. Equal Employment Opportunity Commission, along with any successor report that contains substantially similar data on workforce demographics and pay, categorized by race, sex, ethnicity, and job position.

Filing Component 2 of the EEO-1 report, however, is not currently required. The EEOC previously introduced this component to gather aggregated W-2 earnings data by race/ethnicity, sex, and job category, organized into pay bands. This information was collected for the 2017 and 2018 calendar years but has not been required since. The Massachusetts statute was designed to align with EEOC reporting requirements, so if the EEOC reinstates Component 2 in the future, it would also become a mandatory filing requirement in Massachusetts.

Starting October 29, 2025, Massachusetts employers with 25 or more employees must provide the pay range in job postings for any position. Massachusetts' state website clarifies that out-of-state employees whose primary workplace is in Massachusetts count toward the employer's headcount.

Additionally, employees or prospective employees of covered employers have the right to know the pay range for a position when applying, being promoted or transferred, starting a new role, or upon request for their current position.

The Attorney's General Office holds the exclusive authority to enforce the pay transparency and EEOC data reporting requirements, there is no private right of action for employees or applicants.

### **Why These Laws Matter**

Pay transparency is becoming a central part of compliance for employers in many states, and 2025 has marked a significant expansion of these laws across the nation. Employers failing to comply may face civil penalties or fines in most of the above states.

Employers should review and update job postings to include required pay ranges/benefits, ensure internal promotion and transfer opportunities meet transparency requirements, prepare for annual wage data reporting if the employer meets state thresholds, and employers (even those employers who are not in states with these laws) should stay informed about pending legislation as the trend toward pay transparency continues to grow.

If you have any questions or would like additional information, please contact McKenzie Meade at 205-323-9279 or [mmeade@lehrmiddlebrooks.com](mailto:mmeade@lehrmiddlebrooks.com).