

CLIENT ALERT: Massachusetts Wage Transparency Act: Pay Range Disclosure Obligations Begin October 29, 2025

By Duncan MacKenzie

September 2025

As a reminder, beginning October 29, 2025, covered employers will be required under the Massachusetts Wage Transparency Act to disclose pay ranges in job postings for specific positions, and to disclose that information to current employees and applicants upon request. More information is available in our August 2024 Alert at this [link](#), and additional guidance from the Attorney General since the Act was enacted is available at this [link](#).

Public or private employers who have at least 25 employees for whom Massachusetts was their primary place of work in the last calendar year are covered by the Act. This includes all full-time, part-time, seasonal and temporary employees who performed services for wages, remuneration or other compensation working in Massachusetts or out-of-state employees who work remotely in Massachusetts and those who perform work remotely to a Massachusetts worksite.

To determine whether an employer is a covered employer under the Act, the employer should annually calculate its headcount as an average across all payroll periods of that year. To do this, the employer should add all employees for each pay period and divide that number by the number of pay periods for the year. If that number is at least 25, the employer is covered under the Act.

The Attorney General's guidance regarding the pay range to be disclosed states that "the

range may extend from the lowest to the highest annual salary or hourly wage the employer reasonably and in good faith believes at the time of the posting it would pay [for the position]." If a position's compensation is commission or piece rate based, the expected piece rate or commission range must be included in the posting. Covered employers must provide pay range information to an *employee holding such position* even if there is no vacancy in that role.

As outlined in our previous Alert, the Act also requires employers with at least 100 employees who file EEO reports with the Equal Employment Opportunity Commission to also file them with the Secretary of the Commonwealth. The reports can be filed with the Secretary at this [site](#).

Until October, 29, 2027, employers will have two business days after receiving a Notice to Cure letter to cure violations related to pay range disclosures, and until October 29, 2026, employers will have two business days to cure EEO submission violations.

Copyright © 2025 Belcher Fitzgerald LLP.

All rights reserved.

This publication is not intended as legal advice. Before you make any decision that may have legal implications, you should consult with a qualified legal professional for specific legal advice.