

Report on Locality-Based Comparability Payments for the General Schedule

Annual Report of the President's Pay Agent for Locality Pay in 2025



The President's Pay Agent

Washington, DC

November 27, 2024

Memorandum for the President

Subject: Annual report on General Schedule locality-based comparability payments

Section 5304 of title 5, United States Code, requires the President's Pay Agent to submit a report to the President each year showing the locality-based comparability payments we would recommend for General Schedule (GS) employees if the adjustments were to be made as specified in the statute. To fulfill this obligation, this report shows the adjustments that would be required in 2025 under section 5304, absent overriding legislation or exercise of your alternative plan authority to control locality pay adjustment amounts. Section 5304 stipulated that, by January 2002, locality rates would not be less than the full amount necessary to reduce the pay disparity in each locality pay area to 5 percent, and the pay disparities in this report fulfill the statutory requirement to submit a report each year showing the locality-based comparability payments the Pay Agent would recommend for GS employees if the adjustments were made as specified in the statute. However, the statutory formula for locality adjustments has not been followed since January 1994 because of budgetary and methodological concerns.

Regarding budgetary concerns, this report includes an estimated cost of \$26 billion for reducing GS pay disparities as originally intended by the statute. That cost would have a substantial impact on agency budgets. However, it is also important to emphasize that the underlying methodology for locality pay of relying on one singular locality rate covering a locality pay area has lacked credibility since the beginning of locality pay in 1994 to such a degree that the statutory formula for closing pay gaps has been overridden by either Congress or successive Presidents every year since that first year.

The Federal Salary Council contributes substantial advice to the administration of the locality pay program, and we appreciate the Council's public deliberations and recommendations for the administration of locality pay for the Government's 1.5 million employees who are paid under the General Schedule. The Council's [recommendations](#) for locality pay in 2025 are posted on the U.S. Office of Personnel Management website. We acknowledge that the methods the Council used to calculate the locality pay rates that would go into effect in January 2025 absent another provision of law are appropriate. We also tentatively approve, pending appropriate rulemaking, the Council's recommendations for defining locality pay areas geographically for 2025.

Those recommendations include basing the boundaries of locality pay areas on the delineations of metropolitan statistical areas and combined statistical areas in Office of Management and Budget Bulletin No. 23-01 and using 2016-2020 American Community Survey commuting data to evaluate potential areas of application. No locations would be redesignated to a lower-paying locality pay area under the recommendations.

We remain in agreement with the Council that locality pay areas should continue to be defined by consistently applying standard criteria to all locations throughout the country but that stakeholder input regarding criteria used to define and establish locality pay areas can be helpful to the Council as it continues to consider what criteria are best to apply for purposes of establishing locality pay area boundaries.

We also agree with the Council that pay compression resulting from locality pay rates being limited to level IV of the Executive Schedule is a growing problem. As noted in the President's FY 2025 Budget, addressing pay compression is a critical component of attracting and retaining experienced talent in roles with significant market competition. The Pay Agent welcomes the opportunity to work with the Congress on the pay compression issue and a number of other issues to ensure that the Federal Government has the targeted tools needed to secure a skilled workforce. However, stakeholders should note that this work is not limited to adjustments within current pay structures. Special compensation authorities that have shown to help specific agencies with their workforce needs may be appropriate to adopt Governmentwide. For example, the U.S. Office of Personnel Management has transmitted to the Congress for its consideration a package of legislative proposals, developed in concert with the Office of Management and Budget and the Office of the National Cyber Director, to strengthen the personnel system for cyber professionals that includes a new classification and pay system authority, enhanced flexibility for agencies in selecting candidates for cyber positions, and other compensation flexibilities to increase the Federal Government's competitiveness as an employer while preserving longstanding merit system principles and employee rights.

We look forward to continuing to provide staff support for the Council's future deliberations on locality pay under your Administration. However, earlier Pay Agent reports have expressed concern that the GS pay system establishes a single percentage locality rate in each locality pay area without regard to the differing labor markets and average salary levels for major occupational groups. These concerns have been based on the current pay comparison methodology not taking into account the numerous observations made over the years that non-Federal pay in a local labor market varies substantially between different occupational groups. A major concern has been that, as

currently applied, locality payments in a local labor market may leave some mission-critical occupations significantly underpaid while overpaying others. We note these historical concerns for your consideration. However, within the statutory constraints that mandate a single percentage pay disparity calculation and locality pay rate per locality pay area, we and the Federal Salary Council believe there is a substantial gap overall between Federal and non-Federal pay that has been increasing.

The President's Pay Agent:

Signed

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Signed

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Introduction

The Federal Employees Pay Comparability Act of 1990 (FEPCA) replaced the nationwide General Schedule (GS) with a method for setting pay for white-collar employees that uses a combination of across-the-board and location-based pay adjustments. The policy contained in 5 U.S.C. 5301 for setting GS pay is that:

- (1) there be equal pay for substantially equal work within each local pay area;
- (2) within each local pay area, pay distinctions be maintained in keeping with work and performance distinctions;
- (3) Federal pay rates be comparable with non-Federal pay rates for the same levels of work within the same local pay area; and
- (4) any existing pay disparities between Federal and non-Federal employees should be completely eliminated.

The across-the-board pay adjustment provides the same percentage increase to the statutory pay systems (as defined in 5 U.S.C. 5302(1)) in all locations. This pay adjustment is linked to changes in the wage and salary component, private industry workers, of the Employment Cost Index (ECI), minus 0.5 percentage points. Locality-based comparability payments for GS employees, which are in addition to the across-the-board increase, are mandated for each locality having a pay disparity between Federal and non-Federal pay of greater than 5 percent. However, the schedule for reducing pay disparities by establishing locality pay adjustments under FEPCA has not been followed through successive Administrations since 1994.

As part of the annual locality pay adjustment process, the Pay Agent prepares and submits a report to the President which:

- (1) Compares rates of pay under the General Schedule with rates of pay for non-Federal workers for the same levels of work within each locality pay area, based on surveys conducted by the U.S. Bureau of Labor Statistics;
- (2) Identifies each locality in which a pay disparity exists and specifies the size of each pay disparity;
- (3) Recommends appropriate comparability payments; and

- (4) Includes the views and recommendations of the Federal Salary Council, individual members of the Council, and employee organizations.

The President's Pay Agent consists of the Secretary of Labor and the respective Directors of the Office of Management and Budget (OMB) and Office of Personnel Management (OPM). This report fulfills the Pay Agent's responsibility under 5 U.S.C. 5304(d) and recommends locality pay adjustments that would occur for 2025 only if such adjustments were to be made as specified under 5 U.S.C. 5304 (that is, to leave no more than a 5-percent remaining pay gap in each locality pay area). That formula for pay gap closure has not been followed since 1994.

Across-the-board and locality adjustments

Under FEPCA, GS salary adjustments, as of January 1994, consist of two components: (1) a general increase linked to the ECI and applicable to the General Schedule, Foreign Service pay schedules, and certain pay schedules established under title 38, United States Code, for Veterans Health Administration employees; and (2) a GS locality adjustment that applies only to specific areas of the U.S. where non-Federal pay exceeds Federal pay by more than 5 percent.

The formula for the general increase (defined in section 5303 of title 5, United States Code) provides that the pay rates for each statutory pay system be increased by a percentage equal to the 12-month percentage increase in the ECI minus one-half of one percentage point. The 12-month reference period ends with the September preceding the effective date of the adjustment by 15 months.

The ECI reference period for the January 2025 increase is the 12-month period ending September 2023. During that period, the ECI wage and salary component, private industry workers, increased by 4.5 percent. Therefore, the January 2025 general increase would be 4.0 percent (4.5 percent minus 0.5 percentage points). (Note that President Biden included a 2.0 percent overall average January 2025 increase for civilian employees in his Fiscal Year 2025 Budget.)

In its annual report for locality pay in 2025, the Federal Salary Council supported increased funding for annual pay adjustments, both for the base General Schedule and for locality pay increases. The Council expressed concern that, in many past years since locality pay was implemented in 1994, increases in base GS rates were less than what would be authorized under 5 U.S.C. 5303(a). The Council wrote that providing smaller base pay increases exacerbates pay disparities throughout the country and has the effect of increasing the locality pay dollars needed to close pay disparities in locality pay areas.

The locality component of the pay adjustment under FEPCA was to be phased in over a 9-year period. In 1994, the minimum comparability increase was two tenths of the “target” pay disparity (that is, the amount needed to reduce the pay disparity to 5 percent). For each successive year, the comparability increase was scheduled to be at least an additional one tenth of the target pay disparity. For 2002 and thereafter, the underlying law authorized the full amount necessary to reduce the pay disparity in each locality pay area to 5 percent. However, as stated above, the schedule for reducing

pay disparities by establishing locality pay adjustments under FEPCA has not been followed through successive Administrations since 1994.

Locality pay rates being limited under 5 U.S.C. 5304 (g)(1) to level IV of the Executive Schedule (EX-IV) is gaining significance as an issue impacting the Government's ability to reduce pay disparities. In its annual report for locality pay in 2025, the Federal Salary Council expressed concerns regarding the worsening pay compression in the growing number of locality pay areas where locality pay rates reach the EX-IV limitation. This issue is related to the Council's concerns discussed above regarding annual pay adjustments for the General Schedule, since by law an annual pay increase for the Executive Schedule cannot exceed the annual pay increase in the same year for the General Schedule.

The Pay Agent and many stakeholders have expressed concern regarding the validity of the locality pay methodology since the beginnings of locality pay, which is a major reason the locality pay adjustments under FEPCA have not been implemented. Thus, since efforts to reform the compensation system would benefit from a better understanding of pay disparity data, we welcome any additional analysis the Council may provide to support that. For example, we look forward to hearing more from the Council on its work to ascertain the impact of pay range policy on pay disparity data.

Locality pay surveys

FEPCA requires the use of non-Federal salary survey data collected by the U.S. Bureau of Labor Statistics (BLS) to set locality pay. BLS uses information from two of its programs to provide the data. Data from the National Compensation Survey (NCS) are used to estimate how salaries vary by level of work from the occupational average, and Occupational Employment and Wage Statistics (OEWS) data are used to estimate average salaries by occupation in each locality pay area. The process used to combine the data from the two sources is referred to as the *NCS/OEWS model*. The March 2023 non-Federal salary estimates are based on the 2018 version of the Standard Occupational Classification (SOC) codes.

BLS surveys used for locality pay include collection of salary data from establishments of all employment sizes in private industry and State and local governments.¹ The NCS provides comprehensive measures of employer costs for employee compensation, compensation trends, the incidence of employer-provided benefits among workers, and the provisions of selected employer-provided benefits plans. These statistics are available for selected metropolitan areas, regions, and the Nation. An important component of the NCS is an evaluation of jobs to determine a “work level” or grade for the NCS/OEWS model. The NCS collects data from a total of 14,800 establishments.

The OEWS survey measures occupational employment and wage rates of wage and salary workers in non-farm establishments in the 50 States and the District of Columbia. Guam, Puerto Rico, and the U.S. Virgin Islands are also surveyed. About 8.3 million in-scope establishments are stratified within their respective States by sub-state area, size, and industry. Sub-state areas include all officially delineated metropolitan statistical areas and, for each State, one or more residual balance-of-State areas. The North American Industry Classification System is used to stratify establishments by industry.

For OEWS, BLS selects semiannual probability samples, referred to as panels, of approximately 179,000 to 187,000 business establishments, and pools those samples across three years (or six panels) for a total sample of 1.1 million business establishments, in order to have sufficient sample sizes to produce estimates for small estimation cells. Responses are obtained online or by mail, email, telephone, or personal visit. The Standard Occupational Classification (SOC) System is used to define occupations.

¹ The number of units in the NCS and OEWS samples can vary from year to year. The numbers listed in this section refer to the samples used for the estimates in this report.

Estimates of occupational employment and occupational wage rates are based on a rolling six-panel (or three-year) cycle.

The industry scope of the data provided to the Pay Agent includes private goods-producing industries (mining, construction, and manufacturing); private service-providing industries (trade; transportation and utilities; information; financial activities; professional and business services; education and health services; leisure and hospitality; and other services); and State and local governments. The Federal Government, private households, and agriculture, forestry, fishing, and hunting industries were excluded.

Occupational coverage

BLS surveys all jobs in establishments for the OEWS program and selects a sample of jobs within establishments for the NCS program. The jobs from the NCS and OEWS samples are weighted to represent all non-Federal occupations in the location and, based on the crosswalk published in Attachment 4 of the Federal Salary Council's April 2020 recommendations for locality pay in 2021, also represent virtually all GS employees. OPM provided the crosswalk between GS occupational series and the SOC system used by BLS to group non-Federal survey jobs. OPM also provided March 2022 GS employment counts for use in weighting survey job data to higher aggregates.

Matching level of work

BLS collects information on level of work in the NCS program. In the NCS surveys, BLS field economists cannot use a set list of survey job descriptions because BLS uses a random sampling method and any non-Federal job can be selected in an establishment for leveling (that is, grading). In addition, it is not feasible for BLS field economists to consult and use the entire GS position classification system to level survey jobs because it would take too long to gather all the information needed and would place an undue burden on survey participants.

To conduct work leveling under the NCS program, OPM developed a simplified four-factor leveling system with job family guides. These guides were designed to provide occupational-specific leveling instructions for the BLS field economists. The four factors were derived and validated by combining the nine factors under the existing GS Factor Evaluation System. The four factors are knowledge, job controls and complexity, contacts, and physical environment. The factors were validated against a wide variety of GS positions and proved to replicate grade levels expressed in written GS position classification standards. We find the work level comparison aspect of the current methodology to be a critically important area for further examination.

The job family guides cover the complete spectrum of white-collar work found in the Government. Appendix VI of the 2002 Pay Agent's report contains the job family leveling guides. BLS does not collect level of work in the OEWS program. Rather, the impact of grade level on salary is derived from the NCS/OEWS model.

Combining OEWS and NCS data for locality pay

In 2008, the Federal Salary Council asked BLS to explore the use of additional sources of pay data so that the Council could better evaluate the need for establishing additional pay localities, especially in areas where the NCS program could not provide estimates of non-Federal pay. In response, a team of BLS research economists investigated the use of data from the OEWS program in conjunction with NCS data. After careful investigation, the BLS team recommended a regression method combining NCS and OEWS data as the best approach to producing the non-Federal pay estimates required to compute area pay gaps with OEWS data. The President's Fiscal Year (FY) 2011 budget proposed replacing the NCS with the NCS/OEWS model for measuring pay gaps, the Federal Salary Council recommended using the new method in 2012, and the President's Pay Agent adopted the new approach in its May 2013 report for locality pay in 2014.

Regression method

This section provides a non-technical description of the NCS/OEWS model. Appendix I of this report contains a BLS paper that provides technical details.

To calculate estimates of pay gaps, the Pay Agent asks BLS to calculate annual wage estimates by area, occupation, and grade level. These estimates are then weighted by National Federal employment to arrive at wage estimates by broad occupation group and grade for each pay area.

There are five broad occupational groups collectively referred to as "PATCO" categories: Professional (P), Administrative (A), Technical (T), Clerical (C), and Officer (O).

OEWS data provide wage estimates by occupation for each locality pay area, but do not have information by grade level. The NCS has information on grade level, but a much smaller sample with which to calculate occupation-area estimates. To combine the information from the two samples, a regression model is used. The model assumes that the difference between a wage observed in the NCS for a given area, occupation, and grade level, and the corresponding area-occupation wage from the OEWS, can be explained by a few key variables, the most important of which is the grade level itself. The model then predicts the extent to which wages will be higher, on average, for higher

grade levels. It is important to note that the model assumes the relationship between wages and levels is the same throughout the Nation. While this assumption is not likely to hold exactly, the NCS sample size is not large enough to allow the effect of grade level on salary to vary by area.

Once estimated, the model is used to predict the hourly wage rate for area-occupation-grade cells of interest to the Pay Agent. This predicted hourly wage rate is then multiplied by 2,080 hours (52 weeks x 40 hours per week) to arrive at an estimate of the annual earnings for that particular cell. The estimates from the model are then averaged, using Federal employment levels as weights, to form an estimate of annual earnings for PATCO job family and grade for each area.

Comparing General Schedule and non-Federal pay

How local pay disparities are measured

Locality-based comparability payments are a function of local disparities between Federal and non-Federal pay. Pay disparities are measured for each locality pay area by comparing the base GS pay rates of workers paid under the General Schedule pay plan in a geographic area to the annual rates generally paid to non-Federal workers for the same levels of work in the same geographic area. Under the NCS/OEWS model, BLS models salaries for most non-Federal jobs deemed to match GS positions using the crosswalk published in Attachment 4 of the Federal Salary Council’s April 2020 recommendations for locality pay in 2021.

Non-Federal pay rates are estimated on a sample basis by BLS area surveys. The pay rate for each non-Federal job is an estimate of the mean straight-time earnings of full-time, non-Federal workers in the job, based on the BLS survey sample. GS rates are determined from Federal personnel records for the relevant populations of GS workers. Each GS rate is the mean scheduled annual rate of pay of all full-time, permanent, year-round GS workers in the relevant group.

The reference dates of OEWS data vary over the survey cycle for non-Federal salaries. To ensure that local pay disparities are measured as of one common date, it is necessary to “age” the OEWS survey data to a common reference date before comparing it to GS pay data of the same date. March 2023 is the common reference and comparison date used in this report for 2025 pay adjustments. For the calculation of the salary estimates delivered to the Pay Agent, BLS used appropriate ECI factors to adjust OEWS salary data from past survey reference periods to March 2023.

Each non-Federal rate is estimated by BLS using the OEWS mean salary for the occupation/location and factors for level of work derived from the NCS/OEWS model as shown in the following example:

Table 1: Example of NCS/OEWS model estimates—procurement clerks—Washington, DC

Data type	OEWS average	GS-4 model estimate	GS-5 model estimate	GS-6 model estimate	GS-7 model estimate	GS-8 model estimate	GS-9 model estimate
Hourly wage	\$23.50	\$20.10	\$22.40	\$24.40	\$28.40	\$31.10	\$32.70
Ratio to OEWS average	100%	86%	95%	104%	121%	132%	139%

Because 5 U.S.C. 5302(6) requires that each local pay disparity be expressed as a single percentage, the comparison of GS and non-Federal rates of pay in a locality requires that the two sets of rates be reduced to one pair of rates, a GS average and a non-Federal average. An important principle in averaging each set of rates is that the rates of individual survey jobs, job categories, and grades are weighted by Federal GS employment in equivalent classifications. Weighting by Federal employment ensures that the influence of each non-Federal survey job on the overall non-Federal average is proportionate to the frequency of that job in the Federal sector.

We use a three-stage weighted average in the pay disparity calculations. In the first stage, job rates from the NCS/OEWS model are averaged within PATCO category by grade level. The NCS/OEWS model covers virtually all GS jobs. The model produces occupational wage information for jobs found only in the OEWS sample for an area. For averaging within PATCO category, each job rate is weighted by the nationwide full-time, permanent, year-round employment² in GS positions that match the job. BLS combines the individual occupations within PATCO-grade cells and sends OPM average non-Federal salaries by PATCO-grade categories. The reason for National weighting in the first stage is explained below.

When the first stage averages are complete, each grade is represented by up to five PATCO category rates in lieu of its original job rates. Under the NCS/OEWS model, all PATCO-grade categories with Federal incumbents are represented, except where BLS had no data for the PATCO-grade cell in a location.

In the second stage, the PATCO category rates are averaged by grade level to one grade level rate for each grade represented. Thus, at grade GS-5, which has Federal jobs in all five PATCO categories, the five PATCO category rates are averaged to one GS-5 non-Federal pay rate. For averaging by grade, each PATCO category rate is weighted by the local full-time, permanent, year-round GS employment in the category at the grade.

In the third stage, the grade averages are weighted by the corresponding local, full-time, permanent, year-round GS grade level employment and averaged to a single overall non-Federal pay rate for the locality. This overall non-Federal average salary is the non-Federal rate to which the overall average GS rate is compared. Under the NCS/OEWS model, all 15 GS grades can be represented.

² Employment weights include employees in the United States and its territories and possessions.

Since GS rates by grade are not based on a sample, but rather on a census of the relevant GS populations, the first two stages of the above process are omitted in deriving the GS average rate. For each grade level represented by a non-Federal average derived in stage two, we average the scheduled rates of all full-time, permanent, year-round GS employees at the grade in the area. The overall GS average rate is the weighted average of these GS grade level rates, using the same weights as those used to average the non-Federal grade level rates.

Finally, the pay disparity is the percentage by which the overall average non-Federal rate exceeds the overall average GS rate.³ See Appendix II for more detail on pay gaps using the NCS/OEWS model.

As indicated above, at the first stage of averaging the non-Federal data, the weights represent National GS employment, while local GS employment is used to weight the second and third stage averages. GS employment weights are meant to ensure that the effect of each non-Federal pay rate on the overall non-Federal average reflects the relative frequency of Federal employment in matching Federal job classifications.

The methodology employed by the Pay Agent to measure local pay disparities does not use local weights in the first (job level) stage of averaging because this would have an undesirable effect. A survey job whose Federal counterpart has no local GS incumbents will “drop out” in stage one and have no effect on the overall average. For this reason, National weights are used in the first stage of averaging data. National weights are used only where retention of each survey observation is most important—at the job level or stage one. Local weights are used at all other stages.

³ An equivalent procedure for computing the pay disparity compares aggregate pay rather than average pay, where aggregate pay is defined as the sum across grades of the grade level rate times the GS employment by grade level. In fact, the law defines a pay disparity in terms of a comparison of pay aggregates rather than pay averages (5 U.S.C. 5302(6)). Algebraically, however, the percentage difference between sector aggregates (as defined) is exactly the same as the percentage difference between sector averages.

Locality pay areas

Federal Salary Council recommendations regarding locality pay areas

The Council made recommendations on three issues related to locality pay area boundaries for 2025:

1. The Council recommends not establishing any new locality pay areas at this time. Only the Dothan, AL, Rest of US research area meets the pay disparity criterion, and the 47.84 percentage point change in the pay disparity for Dothan between 2022 and 2023 is an anomaly.
2. The Council recommends applying the updates to the delineations of the metropolitan statistical areas and combined statistical areas reflected in Office of Management and Budget (OMB) Bulletin No. 23-01 as such updates were applied with adoption of OMB Bulletin No. 20-01, which contains the delineations of metropolitan statistical areas and combined statistical areas (MSAs and CSAs) currently used in the locality pay program. Also, commuting patterns data collected by the U.S. Census Bureau between 2016 and 2020 as part of the American Community Survey should be used in the calculation of employment interchange rates that are the basis for establishing areas of application.
3. The Pay Agent should add Wyandot County, OH, to the Columbus, OH, locality pay area and Yuma County, AZ, to the Phoenix, AZ, locality pay area, because making the other changes the Council recommended for locality pay in 2025 would otherwise leave Wyandot County completely surrounded by higher locality pay and Yuma County entirely surrounded by higher locality pay but for its southern border with Mexico.

The Pay Agent addresses these Council recommendations below.

1. We agree with the Council that no new locality pay areas should be established at this time based on pay disparities calculated using the NCS/OEWS Model.

As the Council explains in detail in its recommendations, while Dothan, AL, would meet the pay disparity criterion, the 47.84 percentage point change in its pay disparity between 2022 and 2023 is an anomaly resulting from the GS-13, PATCO T salary estimate for Dothan increasing from \$160,514 in 2022 to \$468,517 in 2023.

We appreciate BLS staff investigating this issue and subsequently advising the Council that, while technically correct, the March 2023 data may not be particularly representative of non-Federal equivalents to GS-13 level workers in Dothan. We agree with BLS and the Council that care is warranted when interpreting the salary estimate in question, which we regard as an anomaly.

We also appreciate the Council's plan for its Working Group to work with BLS in 2024 to identify options for addressing anomalous non-Federal salary estimates such as the March 2023 estimate for Dothan, AL. We look forward to learning the results of those efforts.

The Pay Agent also looks forward to hearing of future progress on increasing the capacity to establish additional locations as Rest of US research areas so their pay disparities can be measured for purposes of identifying MSAs and CSAs that should be established as new locality pay areas based on their pay disparities. However, the Council should continue proceeding with caution on this work to ensure pay disparity data for any additional MSAs or CSAs are as accurate as possible in the context of current methodology. The Council's planned work with BLS to identify options for addressing anomalous non-Federal salary estimates might also have value with respect to validating data for locations tested as potential Rest of US research areas.

2. We tentatively agree with the Council that updates to the delineations of the MSAs and CSAs reflected in OMB Bulletin No. 23-01 should be applied in the locality pay program as such updates were applied with adoption of OMB Bulletin No. 20-01, which contains the delineations of MSAs and CSAs currently used in the locality pay program. We also agree that commuting patterns data collected by the U.S. Census Bureau between 2016 and 2020 as part of the American Community Survey should be used in the calculation of employment interchange rates that are the basis for establishing areas of application. However, with respect to using the updated MSAs, CSAs, and commuting data, any resultant changes to the definitions of locality pay areas would require appropriate rulemaking. The timing of such rulemaking has not yet been determined.

As explained in the December 2021 Pay Agent report, OMB-defined metropolitan areas have been the basis for locality pay area boundaries since locality pay was implemented in 1994. However, OMB does not delineate MSAs and CSAs specifically for use in the locality pay program or any other non-statistical program and has cautioned other agencies to review MSA and CSA delineations carefully before using them for non-statistical purposes—such as administering the locality pay program.

We agree with the Council that we should continue the longstanding practice whereby any location that would move to a lower-paying locality pay area as a result of applying the updates in OMB Bulletin No. 23-01 (or associated commuting patterns data) would remain in its current locality pay area as an area of application.

As we have noted previously, some observers over the years have suggested splitting an MSA or CSA between locality pay areas or studying pay in only a portion

of an MSA or CSA in the Rest of US. As the Council noted, the Pay Agent has not previously supported the idea of splitting an MSA or CSA comprising a basic locality pay area between two separate locality pay areas and has indicated doing so would be a significant change requiring careful study. We remain in agreement that the Council should consider any future stakeholder input on this issue. However, interested stakeholders should keep in mind that so far in its history, the locality pay program uses standard criteria applied consistently for all locations throughout the country.

3. We tentatively agree with the Council that the Pay Agent should add Wyandot County, OH, to the Columbus, OH, locality pay area and Yuma County, AZ, to the Phoenix, AZ, locality pay area if OMB Bulletin No. 23-01 MSA and CSA delineations and associated commuting patterns data are used in defining locality pay area boundaries.

This recommendation is consistent with the Pay Agent's historical treatment of similarly situated locations.

Locality pay areas for 2025

The changes in locality pay area boundaries discussed above will not be made until appropriate rulemaking to make those changes is complete. The timing of such rulemaking has not yet been determined. Until such rulemaking is complete, locality pay areas will continue to be defined as in the list below. Note that component counties of the metropolitan statistical areas and combined statistical areas (MSAs and CSAs) comprising basic locality pay areas are listed in OMB Bulletin No. 20-01.

- (1) Alaska—consisting of the State of Alaska;
- (2) Albany-Schenectady, NY-MA—consisting of the Albany-Schenectady, NY CSA and also including Berkshire County, MA, Greene County, NY, and Hamilton County, NY;
- (3) Albuquerque-Santa Fe-Las Vegas, NM—consisting of the Albuquerque-Santa Fe-Las Vegas, NM CSA and also including Cibola County, NM, and McKinley County, NM;
- (4) Atlanta--Athens-Clarke County--Sandy Springs, GA-AL—consisting of the Atlanta--Athens-Clarke County--Sandy Springs, GA-AL CSA and also including Cherokee County, AL, Cleburne County, AL, Lee County, AL, Randolph County, AL, Russell County, AL, Banks County, GA, Chattahoochee County, GA, Elbert County, GA, Franklin County, GA, Gilmer County, GA, Gordon County, GA, Greene County, GA, Harris County, GA, Lumpkin County, GA, Marion County, GA, Muscogee County, GA, Putnam County, GA,

Rabun County, GA, Stewart County, GA, Talbot County, GA, Taliaferro County, GA, and White County, GA;

(5) Austin-Round Rock-Georgetown, TX—consisting of the Austin-Round Rock-Georgetown, TX MSA and also including Blanco County, TX, Burnet County, TX, Lee County, TX, and Milam County, TX;

(6) Birmingham-Hoover-Talladega, AL—consisting of the Birmingham-Hoover-Talladega, AL CSA and also including Calhoun County, AL, Clay County, AL, Coosa County, AL, Etowah County, AL, Greene County, AL, Hale County, AL, Pickens County, AL, Tallapoosa County, AL, Tuscaloosa County, AL, and Winston County, AL;

(7) Boston-Worcester-Providence, MA-RI-NH-CT-ME-VT—consisting of the Boston-Worcester-Providence, MA-RI-NH-CT CSA and also including Androscoggin County, ME, Cumberland County, ME, Sagadahoc County, ME, York County, ME, Dukes County, MA, Nantucket County, MA, Carroll County, NH, Cheshire County, NH, Grafton County, NH, Sullivan County, NH, Orange County, VT, and Windsor County, VT;

(8) Buffalo-Cheektowaga-Olean, NY—consisting of the Buffalo-Cheektowaga-Olean, NY CSA and also including Allegany County, NY, and Wyoming County, NY;

(9) Burlington-South Burlington-Barre, VT—consisting of the Burlington-South Burlington-Barre, VT CSA and also including Addison County, VT, and Lamoille County, VT;

(10) Charlotte-Concord, NC-SC—consisting of the Charlotte-Concord, NC-SC CSA and also including Alexander County, NC, Burke County, NC, Caldwell County, NC, Catawba County, NC, and Chesterfield County, SC;

(11) Chicago-Naperville, IL-IN-WI—consisting of the Chicago-Naperville, IL-IN-WI CSA and also including Boone County, IL, Iroquois County, IL, Ogle County, IL, Stephenson County, IL, Winnebago County, IL, and Starke County, IN;

(12) Cincinnati-Wilmington-Maysville, OH-KY-IN—consisting of the Cincinnati-Wilmington-Maysville, OH-KY-IN CSA and also including Ripley County, IN, Switzerland County, IN, Carroll County, KY, Fleming County, KY, Lewis County, KY,

Owen County, KY, Robertson County, KY, Adams County, OH, and Highland County, OH;

(13) Cleveland-Akron-Canton, OH-PA—consisting of the Cleveland-Akron-Canton, OH CSA and also including Ashland County, OH, Columbiana County, OH, Crawford County, OH, Harrison County, OH, Holmes County, OH, Mahoning County, OH, Richland County, OH, Trumbull County, OH, and Mercer County, PA;

(14) Colorado Springs, CO—consisting of the Colorado Springs, CO MSA and also including Fremont County, CO, and Pueblo County, CO;

(15) Columbus-Marion-Zanesville, OH—consisting of the Columbus-Marion-Zanesville, OH CSA and also including Coshocton County, OH, Hardin County, OH, Morgan County, OH, Noble County, OH, Pike County, OH, and Vinton County, OH;

(16) Corpus Christi-Kingsville-Alice, TX—consisting of the Corpus Christi-Kingsville-Alice, TX CSA and also including Brooks County, TX, Live Oak County, TX, and Refugio County, TX;

(17) Dallas-Fort Worth, TX-OK—consisting of the Dallas-Fort Worth, TX-OK CSA and also including Carter County, OK, Love County, OK, Delta County, TX, Hill County, TX, Hopkins County, TX, Jack County, TX, Montague County, TX, Rains County, TX, Somervell County, TX, and Van Zandt County, TX;

(18) Davenport-Moline, IA-IL—consisting of the Davenport-Moline, IA-IL CSA and also including Carroll County, IL, Lee County, IL, Whiteside County, IL, Cedar County, IA, Jackson County, IA, and Louisa County, IA;

(19) Dayton-Springfield-Kettering, OH—consisting of the Dayton-Springfield-Kettering, OH CSA and also including Allen County, OH, Auglaize County, OH, Mercer County, OH, Preble County, OH, and Van Wert County, OH;

(20) Denver-Aurora, CO—consisting of the Denver-Aurora, CO CSA and also including Larimer County, CO, and Lincoln County, CO;

(21) Des Moines-Ames-West Des Moines, IA—consisting of the Des Moines-Ames-West Des Moines, IA CSA and also including Adair County, IA, Clarke County, IA, Greene County, IA, Hamilton County, IA, Lucas County, IA, Monroe County, IA, and Poweshiek County, IA;

- (22) Detroit-Warren-Ann Arbor, MI—consisting of the Detroit-Warren-Ann Arbor, MI CSA and also including Clinton County, MI, Eaton County, MI, Huron County, MI, Ingham County, MI, Jackson County, MI, Sanilac County, MI, Shiawassee County, MI, and Tuscola County, MI;
- (23) Fresno-Madera-Hanford, CA—consisting of the Fresno-Madera-Hanford, CA CSA and also including Mariposa County, CA, and Tulare County, CA;
- (24) Harrisburg-Lebanon, PA—consisting of the Harrisburg-York-Lebanon, PA CSA, except for Adams County, PA, and York County, PA, and also including Juniata County, PA, and Lancaster County, PA;
- (25) Hartford-East Hartford, CT-MA—consisting of the Hartford-East Hartford, CT CSA and also including Franklin County, MA, Hampden County, MA, and Hampshire County, MA;
- (26) Hawaii—consisting of the State of Hawaii;
- (27) Houston-The Woodlands, TX—consisting of the Houston-The Woodlands, TX CSA and also including Colorado County, TX, Grimes County, TX, Jackson County, TX, Madison County, TX, San Jacinto County, TX, and Trinity County, TX;
- (28) Huntsville-Decatur, AL-TN—consisting of the Huntsville-Decatur, AL CSA and also including Colbert County, AL, DeKalb County, AL, Lauderdale County, AL, Marshall County, AL, and Lincoln County, TN;
- (29) Indianapolis-Carmel-Muncie, IN—consisting of the Indianapolis-Carmel-Muncie, IN CSA and also including Benton County, IN, Blackford County, IN, Carroll County, IN, Clinton County, IN, Fayette County, IN, Fountain County, IN, Grant County, IN, Lawrence County, IN, Monroe County, IN, Owen County, IN, Randolph County, IN, Rush County, IN, Tippecanoe County, IN, Tipton County, IN, Warren County, IN, and Wayne County, IN;
- (30) Kansas City-Overland Park-Kansas City, MO-KS—consisting of the Kansas City-Overland Park-Kansas City, MO-KS CSA and also including Anderson County, KS, Jackson County, KS, Jefferson County, KS, Osage County, KS, Shawnee County, KS, Wabaunsee County, KS, Carroll County, MO, Daviess County, MO, Gentry County, MO, Henry County, MO, and Holt County, MO;

- (31) Laredo, TX—consisting of the Laredo, TX MSA and also including Jim Hogg County, TX, and La Salle County, TX;
- (32) Las Vegas-Henderson, NV-AZ—consisting of the Las Vegas-Henderson, NV CSA and also including Mohave County, AZ;
- (33) Los Angeles-Long Beach, CA—consisting of the Los Angeles-Long Beach, CA CSA and also including Imperial County, CA, Kern County, CA, San Luis Obispo County, CA, and Santa Barbara County, CA;
- (34) Miami-Port St. Lucie-Fort Lauderdale, FL—consisting of the Miami-Port St. Lucie-Fort Lauderdale, FL CSA and also including Okeechobee County, FL;
- (35) Milwaukee-Racine-Waukesha, WI—consisting of the Milwaukee-Racine-Waukesha, WI CSA and also including Fond du Lac County, WI, and Sheboygan County, WI;
- (36) Minneapolis-St. Paul, MN-WI—consisting of the Minneapolis-St. Paul, MN-WI CSA and also including Blue Earth County, MN, Brown County, MN, Dodge County, MN, Fillmore County, MN, Kanabec County, MN, Meeker County, MN, Morrison County, MN, Mower County, MN, Nicollet County, MN, Olmsted County, MN, Pine County, MN, Sibley County, MN, Wabasha County, MN, Waseca County, MN, and Polk County, WI;
- (37) New York-Newark, NY-NJ-CT-PA—consisting of the New York-Newark, NY-NJ-CT-PA CSA and also including Warren County, NJ, Sullivan County, NY, Carbon County, PA, Lehigh County, PA, Northampton County, PA, Wayne County, PA, and all of Joint Base McGuire-Dix-Lakehurst;
- (38) Omaha-Council Bluffs-Fremont, NE-IA—consisting of the Omaha-Council Bluffs-Fremont, NE-IA CSA and also including Fremont County, IA, Shelby County, IA, and Burt County, NE;
- (39) Palm Bay-Melbourne-Titusville, FL—consisting of the Palm Bay-Melbourne-Titusville, FL MSA;
- (40) Philadelphia-Reading-Camden, PA-NJ-DE-MD—consisting of the Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA, except for Joint Base McGuire-Dix-Lakehurst, and also including Sussex County, DE, Somerset County, MD, Wicomico County, MD, Worcester County, MD, and Schuylkill County, PA;

- (41) Phoenix-Mesa, AZ—consisting of the Phoenix-Mesa, AZ CSA;
- (42) Pittsburgh-New Castle-Weirton, PA-OH-WV—consisting of the Pittsburgh-New Castle-Weirton, PA-OH-WV CSA and also including Belmont County, OH, Cambria County, PA, Greene County, PA, Somerset County, PA, Marshall County, WV, and Ohio County, WV;
- (43) Portland-Vancouver-Salem, OR-WA—consisting of the Portland-Vancouver-Salem, OR-WA CSA and also including Wahkiakum County, WA;
- (44) Raleigh-Durham-Cary, NC—consisting of the Raleigh-Durham-Cary, NC CSA and also including Caswell County, NC, Cumberland County, NC, Edgecombe County, NC, Halifax County, NC, Harnett County, NC, Hoke County, NC, Lee County, NC, Moore County, NC, Nash County, NC, Northampton County, NC, Robeson County, NC, Scotland County, NC, Warren County, NC, Wayne County, NC, and Wilson County, NC;
- (45) Reno-Fernley, NV—consisting of the Reno-Carson City-Fernley, NV CSA, except for Carson City, NV, and Douglas County, NV, and also including Churchill County, NV;
- (46) Richmond, VA—consisting of the Richmond, VA MSA and also including Brunswick County, VA, Cumberland County, VA, Essex County, VA, Greensville County, VA, Louisa County, VA, Nottoway County, VA, and Emporia city, VA;
- (47) Rochester-Batavia-Seneca Falls, NY—consisting of the Rochester-Batavia-Seneca Falls, NY CSA;
- (48) Sacramento-Roseville, CA-NV—consisting of the Sacramento-Roseville, CA CSA and also including Alpine County, CA, Amador County, CA, Butte County, CA, Colusa County, CA, Sierra County, CA, Carson City, NV, and Douglas County, NV;
- (49) San Antonio-New Braunfels-Pearsall, TX—consisting of the San Antonio-New Braunfels-Pearsall, TX CSA and also including Gillespie County, TX, Gonzales County, TX, Karnes County, TX, Kerr County, TX, and McMullen County, TX;
- (50) San Diego-Chula Vista-Carlsbad, CA—consisting of the San Diego-Chula Vista-Carlsbad, CA MSA;
- (51) San Jose-San Francisco-Oakland, CA—consisting of the San Jose-San Francisco-Oakland, CA CSA and also including Calaveras County, CA, and Monterey County, CA;

(52) Seattle-Tacoma, WA—consisting of the Seattle-Tacoma, WA CSA and also including Clallam County, WA, Grays Harbor County, WA, Jefferson County, WA, Pacific County, WA, San Juan County, WA, and Whatcom County, WA;

(53) Spokane-Spokane Valley-Coeur d'Alene, WA-ID—consisting of the Spokane-Spokane Valley-Coeur d'Alene, WA-ID CSA and also including Benewah County, ID, Shoshone County, ID, Ferry County, WA, Lincoln County, WA, and Pend Oreille County, WA;

(54) St. Louis-St. Charles-Farmington, MO-IL—consisting of the St. Louis-St. Charles-Farmington, MO-IL CSA and also including Fayette County, IL, Greene County, IL, Montgomery County, IL, Randolph County, IL, Washington County, IL, Crawford County, MO, Gasconade County, MO, Iron County, MO, Madison County, MO, Montgomery County, MO, Pike County, MO, Ste. Genevieve County, MO, and Washington County, MO;

(55) Tucson-Nogales, AZ—consisting of the Tucson-Nogales, AZ CSA and also including Cochise County, AZ;

(56) Virginia Beach-Norfolk, VA-NC—consisting of the Virginia Beach-Norfolk, VA-NC CSA and also including Chowan County, NC, Hertford County, NC, Tyrrell County, NC, Middlesex County, VA, and Surry County, VA;

(57) Washington-Baltimore-Arlington, DC-MD-VA-WV-PA—consisting of the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA and also including Allegany County, MD, Caroline County, MD, Dorchester County, MD, Kent County, MD, Adams County, PA, Fulton County, PA, York County, PA, Caroline County, VA, King George County, VA, Orange County, VA, Shenandoah County, VA, Westmoreland County, VA, Hardy County, WV, and Mineral County, WV; and

(58) Rest of U.S.—consisting of those portions of the United States and its territories and possessions as listed in 5 CFR 591.205 not located within another locality pay area.

Pay disparities and comparability payments

It is important to emphasize that the underlying methodology for locality pay of relying on one singular locality rate covering a locality pay area has lacked credibility since the beginning of locality pay in 1994 to such a degree that the statutory formula for closing pay gaps has been overridden either by Congress or by successive Presidents each and every year since that first year. However, the pay disparities listed below fulfill the statutory requirement to submit a report each year showing the locality-based comparability payments the Pay Agent would recommend for GS employees if the adjustments were made as specified in the statute.

Table 2 below lists the pay disparity based on the current NCS/OEWS model for each locality pay area. Table 2 also shows the recommended local comparability payments under 5 U.S.C. 5304(a)(3)(I) for 2025 based on the pay disparities, as well as the pay disparities that would remain if the recommended payments were adopted.

The law requires comparability payments only in localities where the pay disparity exceeds 5 percent. The goal in 5 U.S.C 5304(a)(3)(I) was to reduce local pay disparities to no more than 5 percent over a 9-year period. The “Disparity to Close” shown in Table 2 represents the pay disparity to be closed in each area based on the 5 percent remaining disparity threshold. The “Locality Payment” shown in the table represents 100 percent of the disparity to close. The last column shows the pay disparity that would remain in each area if the indicated payments were made. For example, in Alaska, the 63.27 percent pay disparity would be reduced to 5.00 percent if the locality rate were increased to 55.50 percent ($163.27 / 155.50 - 1$ rounds to 5 percent).

Table 2: Local pay disparities and 2025 comparability payments

Locality	Pay disparity	Disparity to close and locality payment	Remaining disparity
Alaska	63.27%	55.50%	5.00%
Albany-Schenectady, NY-MA	57.79%	50.28%	5.00%
Albuquerque-Santa Fe-Las Vegas, NM	41.26%	34.53%	5.00%
Atlanta--Athens-Clarke County--Sandy Springs, GA-AL	50.41%	43.25%	5.00%
Austin-Round Rock, TX	48.25%	41.19%	5.00%
Birmingham-Hoover-Talladega, AL	44.08%	37.22%	5.00%
Boston-Worcester-Providence, MA-RI-NH-ME	75.83%	67.46%	5.00%
Buffalo-Cheektowaga, NY	53.47%	46.16%	5.00%
Burlington-South Burlington, VT	54.28%	46.93%	5.00%

Locality	Pay disparity	Disparity to close and locality payment	Remaining disparity
Charlotte-Concord, NC-SC	50.28%	43.12%	5.00%
Chicago-Naperville, IL-IN-WI	64.27%	56.45%	5.00%
Cincinnati-Wilmington-Maysville, OH-KY-IN	42.59%	35.80%	5.00%
Cleveland-Akron-Canton, OH	41.64%	34.90%	5.00%
Colorado Springs, CO	51.48%	44.27%	5.00%
Columbus-Marion-Zanesville, OH	49.49%	42.37%	5.00%
Corpus Christi-Kingsville-Alice, TX	35.90%	30.65%	4.02%
Dallas-Fort Worth, TX-OK	54.74%	47.37%	5.00%
Davenport-Moline, IA-IL	40.94%	34.23%	5.00%
Dayton-Springfield-Sidney, OH	44.46%	37.58%	5.00%
Denver-Aurora, CO	75.15%	66.81%	5.00%
Des Moines-Ames-West Des Moines, IA	43.90%	37.05%	5.00%
Detroit-Warren-Ann Arbor, MI	53.30%	46.00%	5.00%
Fresno-Madera-Hanford, CA	53.40%	46.10%	5.00%
Harrisburg-Lebanon, PA	45.34%	38.42%	5.00%
Hartford-West Hartford, CT-MA	66.46%	58.53%	5.00%
Hawaii	53.49%	46.18%	5.00%
Houston-The Woodlands, TX	58.47%	50.92%	5.00%
Huntsville-Decatur-Albertville, AL	53.53%	46.22%	5.00%
Indianapolis-Carmel-Muncie, IN	39.38%	32.74%	5.00%
Kansas City-Overland Park-Kansas City, MO-KS	44.30%	37.43%	5.00%
Laredo, TX	43.50%	36.67%	5.00%
Las Vegas-Henderson, NV-AZ	46.06%	39.10%	5.00%
Los Angeles-Long Beach, CA	80.97%	72.35%	5.00%
Miami-Fort Lauderdale-Port St. Lucie, FL	45.77%	38.83%	5.00%
Milwaukee-Racine-Waukesha, WI	44.87%	37.97%	5.00%
Minneapolis-St. Paul, MN-WI	62.43%	54.70%	5.00%
New York-Newark, NY-NJ-CT-PA	87.31%	78.39%	5.00%
Omaha-Council Bluffs-Fremont, NE-IA	41.28%	34.55%	5.00%
Palm Bay-Melbourne-Titusville, FL	43.75%	36.90%	5.00%
Philadelphia-Reading-Camden, PA-NJ-DE-MD	61.87%	54.16%	5.00%
Phoenix-Mesa-Scottsdale, AZ	54.33%	46.98%	5.00%
Pittsburgh-New Castle-Weirton, PA-OH-WV	41.96%	35.20%	5.00%
Portland-Vancouver-Salem, OR-WA	60.84%	53.18%	5.00%
Raleigh-Durham-Chapel Hill, NC	48.60%	41.52%	5.00%
Reno-Fernley, NV	48.17%	41.11%	5.00%
Rest of US	37.18%	30.65%	5.00%
Richmond, VA	50.47%	43.30%	5.00%
Rochester-Batavia-Seneca Falls, NY	55.44%	48.04%	5.00%

Locality	Pay disparity	Disparity to close and locality payment	Remaining disparity
Sacramento-Roseville, CA-NV	72.23%	64.03%	5.00%
San Antonio-New Braunfels-Pearsall, TX	42.29%	35.51%	5.00%
San Diego-Carlsbad, CA	80.50%	71.90%	5.00%
San Jose-San Francisco-Oakland, CA	109.43%	99.46%	5.00%
Seattle-Tacoma, WA	83.63%	74.89%	5.00%
Spokane-Spokane Valley-Coeur d'Alene, WA-ID	52.98%	45.70%	5.00%
St. Louis-St. Charles-Farmington, MO-IL	50.07%	42.92%	5.00%
Tucson-Nogales, AZ	46.56%	39.58%	5.00%
Virginia Beach-Norfolk, VA-NC	45.33%	38.41%	5.00%
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA	81.42%	72.78%	5.00%

Note:

The pay disparity for the Corpus Christi, TX, locality pay area shown in Table 2 above remains below the pay disparity for the Rest of US locality pay area. When a pay disparity for a separate locality pay area falls below that for the Rest of US, the Rest of US target pay gap is recommended for that locality pay area, and the Council continues to monitor the pay disparity for the locality pay area.

Average locality rate

The average locality comparability rate in 2025, using the basic GS payroll as of March 2023 to weight the individual rates, would be 51.81 percent under the methodology used for this report (based on the disparity to close). The average rate authorized in 2023 was 24.98 percent using 2023 payroll weights. The locality rates included in this report would represent a 21.47 percent average pay increase over 2023 locality rates.

Overall remaining pay disparities

The full pay disparities contained in this report average 59.40 percent using the basic GS payroll to weight the local pay disparities. However, this calculation excludes existing locality payments. When the existing locality payments (that is, those paid in 2023) are included in the comparison, the overall remaining pay disparity as of March 2023 was $(159.40 / 124.98 - 1)$, or 27.54 percent. Table 3 below shows the overall remaining pay disparity as of March 2023 in each of the 58 current locality pay areas.

Table 3: Remaining pay disparities in 2023

Locality	Remaining disparity
Alaska	24.33%
Albany-Schenectady, NY-MA	32.10%
Albuquerque-Santa Fe-Las Vegas, NM	20.09%
Atlanta--Athens-Clarke County--Sandy Springs, GA-AL	22.26%
Austin-Round Rock, TX	24.16%
Birmingham-Hoover-Talladega, AL	22.72%
Boston-Worcester-Providence, MA-RI-NH-ME	34.17%
Buffalo-Cheektowaga, NY	26.47%
Burlington-South Burlington, VT	30.40%
Charlotte-Concord, NC-SC	26.68%
Chicago-Naperville, IL-IN-WI	26.57%
Cincinnati-Wilmington-Maysville, OH-KY-IN	17.50%
Cleveland-Akron-Canton, OH	16.39%
Colorado Springs, CO	27.18%
Columbus-Marion-Zanesville, OH	23.27%
Corpus Christi-Kingsville-Alice, TX	16.05%
Dallas-Fort Worth, TX-OK	22.45%
Davenport-Moline, IA-IL	19.23%
Dayton-Springfield-Sidney, OH	19.79%
Denver-Aurora, CO	35.72%
Des Moines-Ames-West Des Moines, IA	22.85%
Detroit-Warren-Ann Arbor, MI	19.42%
Fresno-Madera-Hanford, CA	31.67%
Harrisburg-Lebanon, PA	22.56%
Hartford-West Hartford, CT-MA	27.16%
Hawaii	26.67%
Houston-The Woodlands, TX	17.85%
Huntsville-Decatur-Albertville, AL	26.93%
Indianapolis-Carmel-Muncie, IN	18.55%
Kansas City-Overland Park-Kansas City, MO-KS	22.10%
Laredo, TX	18.95%
Las Vegas-Henderson, NV-AZ	22.99%
Los Angeles-Long Beach, CA	34.16%
Miami-Fort Lauderdale-Port St. Lucie, FL	17.42%
Milwaukee-Racine-Waukesha, WI	19.00%
Minneapolis-St. Paul, MN-WI	28.51%
New York-Newark, NY-NJ-CT-PA	37.57%
Omaha-Council Bluffs-Fremont, NE-IA	20.22%
Palm Bay-Melbourne-Titusville, FL	22.55%
Philadelphia-Reading-Camden, PA-NJ-DE-MD	26.62%

Locality	Remaining disparity
Phoenix-Mesa-Scottsdale, AZ	27.08%
Pittsburgh-New Castle-Weirton, PA-OH-WV	17.94%
Portland-Vancouver-Salem, OR-WA	28.69%
Raleigh-Durham-Chapel Hill, NC	22.44%
Reno-Fernley, NV	27.18%
Rest of US	17.75%
Richmond, VA	23.97%
Rochester-Batavia-Seneca Falls, NY	33.42%
Sacramento-Roseville, CA-NV	34.24%
San Antonio-New Braunfels-Pearsall, TX	20.58%
San Diego-Carlsbad, CA	36.73%
San Jose-San Francisco-Oakland, CA	45.29%
Seattle-Tacoma, WA	41.72%
Spokane-Spokane Valley-Coeur d'Alene, WA-ID	31.31%
St. Louis-St. Charles-Farmington, MO-IL	26.00%
Tucson-Nogales, AZ	23.78%
Virginia Beach-Norfolk, VA-NC	23.22%
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA	36.93%
Average	27.54%

Cost of locality payments

Estimating the cost of locality payments

We estimate the cost of locality payments using OPM records of Federal employees in locality pay areas as of March 2023 who are covered by the General Schedule or other pay plan to which locality pay has been extended, together with the percentage locality payments from Table 2 above. The estimate assumes that the average number and distribution of employees (by locality, grade, and step) in 2025 will not differ substantially from the number and distribution in March 2023. The estimate does not include increases in premium pay costs or Government contributions for retirement, life insurance, or other employee benefits that may be attributed to locality payments. It also accounts for cost offsets in the non-foreign areas where cost-of-living allowance payments are reduced as locality pay is phased in and for the impact of statutory pay caps on payable rates.

Cost estimates are derived as follows. First, we determine either the regular GS base rate or any applicable special rate as of 2023 for each employee. These rates were adjusted for the 4.7 percent across-the-board base GS increase in January 2024, plus a 4.0 percent across-the-board base GS increase that would take effect in January 2025 absent another provision of law. Annual rates are converted to expected annual earnings by multiplying each annual salary by an appropriate work schedule factor.⁴ The “gross locality payment” is computed by multiplying expected annual earnings from the GS base rate by the proposed locality payment percentage for the employee’s locality pay area and applying the applicable locality pay cap if necessary. The sum of these gross locality payments is the cost of locality pay before offset by special rates.

For employees receiving a special rate, the gross locality payment is compared to the amount by which the special rate exceeds the regular rate. This amount is the “cost” of any special rate. If the gross locality payment is less than or equal to the cost of any special rate, the net locality payment is zero. In this case, the locality payment is completely offset by an existing special rate. If the gross locality payment is greater than the cost of any special rate, the net locality payment is equal to the gross locality payment minus the special rate. In this case, the locality payment is partially offset. The sum of the net locality payments is the estimated cost of local comparability payments.

⁴The work schedule factor equals 1 for full-time employees and one of several values less than 1 for the several categories of non-full-time employees.

Estimated cost of locality payments in 2025

Table 4 below compares the cost of estimated baseline 2023 locality pay rates to those that would be authorized in 2025 under 5 U.S.C. 5304(a)(3)(I), as identified above in Table 2. The “2024 Baseline” cost would be the cost of locality pay rates in 2025 if the locality percentages were not increased.

The “2025 Locality Pay” columns show what the total locality payments would be and the net increase in 2025. The “2025 Increase” column shows the 2025 total payment minus the 2024 baseline—that is, the increase in locality payments in 2025 attributable to higher locality pay percentages. Based on the assumptions outlined above, we estimate the total cost attributable to the locality rates shown in Table 2 over rates currently in effect to be about \$26.289 billion on an annual basis. This amount does not include the cost of benefits affected by locality pay raises.

This cost estimate excludes 4,457 records (out of 1.5 million) of white-collar workers which were unusable because of errors. Many of these employees may receive locality payments. Including these records would add about \$80 million to the net cost of locality payments. The cost estimate also excludes a locality pay cost of about \$563 million net of cost-of-living allowance offsets for white-collar employees in Alaska, Hawaii, and the other non-foreign areas under the Non-Foreign Area Retirement Equity Assurance Act of 2009 that extended locality pay to employees in the non-foreign areas.

The cost estimate covers only GS employees and employees covered by pay plans that receive locality pay by action of the Pay Agent. However, the cost estimate excludes members of the Foreign Service because the U.S. Department of State no longer reports these employees to OPM. The estimate also excludes the cost of pay raises for employees under other pay systems that may be linked in some fashion to locality pay increases. These other pay systems include the Federal Wage System for blue-collar workers, under which pay raises often are capped or otherwise affected by increases in locality rates for white-collar workers; pay raises for employees of the Federal Aviation Administration, and other agencies that have independent authority to set pay; and pay raises for employees covered by various demonstration projects. The cost estimate also excludes the cost of benefits affected by pay raises.

Table 4: Cost of local comparability payments in 2025 (in billions of dollars)

Cost component	2024 Baseline	2025 Locality pay	
		Total payments	2025 Increase
Gross locality payments	\$29.440	\$56.798	\$27.358
Special rates offsets	\$1.868	\$2.937	\$1.069
Net locality payments	\$27.572	\$53.861	\$26.289

Recommendations of the Federal Salary Council and employee organizations

The Federal Salary Council’s deliberations and recommendations have had an important and constructive influence on the findings and recommendations of the Pay Agent. (The Council’s [recommendations](#) for locality pay in 2025 are posted on the U.S. Office of Personnel Management website.) The members of the Council at that meeting were:

Dr. Stephen E. Condrey	Chairman
Ms. Janice R. Lachance	Expert
Dr. Jared J. Llorens	Expert
Dr. Everett Kelley	Employee Organization Representative American Federation of Government Employees
Ms. Jacqueline Simon	Employee Organization Representative American Federation of Government Employees
Mr. Patrick J. Yoes	Employee Organization Representative Fraternal Order of Police
Mr. David J. Holway	Employee Organization Representative National Association of Government Employees
Mr. Randy Erwin	Employee Organization Representative National Federation of Federal Employees

The Council’s recommendations were provided to a selection of organizations not represented on the Council. Those organizations were asked to send comments for inclusion in this report. Comments received appear in Appendix III of this report.