

# LEGAL ALERT

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## COLUMBUS JOINS OTHER OHIO CITIES IN ADOPTING PAY TRANSPARENCY ORDINANCE

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Columbus' new pay transparency law took effect on December 3, 2025, but enforcement does not start until January 1, 2027, giving Columbus employers ample time to update their hiring practices. Columbus, Cleveland, Cincinnati, and Toledo each have similar salary history laws on the books that prohibit inquiries into an applicant's salary history. With the amendment to Columbus City Code Chapter 2335, Columbus joins Cleveland in requiring that job postings contain a position's salary or salary range; however, the Columbus ordinance also requires that the salary range be "reasonable," a requirement not found in Cleveland's ordinance. For easy reference, key provisions of the ordinance and actionable steps for compliance are outlined below.

### WHO IS COVERED?

Employers subject to these requirements include individuals, firms, partnerships, corporations, or other entities with fifteen or more employees within the City of Columbus. This includes job placement and referral agencies acting on behalf of a covered employer but does not apply to any government employers other than the City of Columbus. Importantly, the ordinance applies regardless of where the employer is headquartered, or an interview takes place. The focus is on whether the prospective employment will occur within the City of Columbus.

### EXISTING REQUIREMENTS

Chapter 2335 of the Columbus City Code, which has been in place since March 1, 2024, contains the following restrictions:

**No inquiring about salary history.** Employers cannot communicate with an applicant or an applicant's former employer for the purpose of obtaining the applicant's salary history. Nor can an employer search publicly available records or reports for that purpose.

**No screening applicants or hiring decisions based on salary history.** Employers cannot screen applicants based on their current wages or salary history, require that an applicant's past



wages or salary history satisfy certain minimum or maximum criteria, or use salary history as the sole factor in hiring or contract negotiation decision-making. Any refusal to hire, or retaliation against, an applicant who refuses to disclose salary history is prohibited.

## NEW REQUIREMENTS

Effective December 3, 2025, Chapter 2335 as amended by Ordinance 2898-2025 now requires Columbus employers to:

**Provide reasonable salary range or scale in employment postings.** All job postings must include a reasonable salary range or scale. Under the Ordinance, covered job postings are those that include a description of the position and/or desired qualifications. Salary is defined as financial compensation in exchange for labor, including wages, commissions, hourly and other monetary earnings. Unlike Cleveland's ordinance, the definition of salary does not explicitly include benefits.

**What is reasonable?** Whether a salary range or scale will be considered reasonable is based on factors specific to the position, including the flexibility of a hiring budget, the range of anticipated experience among applicants, potential variation in position responsibilities, opportunities for growth, cost of living, and market research regarding comparable positions and salaries.

## WHAT IS PERMITTED?

Employers *may* discuss salary expectations for the new position, including unvested equity or deferred compensation. The prohibition covers past compensation only, not forward-looking discussions.

Other exceptions to the restrictions include:

- Voluntary, unprompted disclosure by an applicant of current or prior compensation;
- Internal transfers and promotions;
- Incidental disclosure during background checks (if not relied upon solely);
- Rehired employees where prior salary information exists that is three years old or less;
- Collective bargaining arrangements; and
- Reliance on salary histories that are authorized by another superseding law.

## ENFORCEMENT AND PENALTIES

While the original requirements of Chapter 2335 are already in effect, new requirements added through Ordinance 2898-2025 will not be enforced until January 1, 2027. This gives Columbus employers more than a year to ensure compliance with the new job posting requirements.

Should a violation occur, applicants must file a written complaint with the Community Relations Commission within six months of the alleged unlawful hiring or salary practice.

**Resolution process.** Following receipt of a complaint, the Commission may conduct an investigation. If the investigation uncovers a reasonable basis to believe that an unlawful practice has occurred, the investigator will work with the employer to cure any violations.

**Civil penalties.** If a violation is not cured, employers may be assessed with civil penalties. These civil penalties will be assessed in compliance with [Columbus City Code Section 2331.05](#), but the precise amount of those civil penalties still appears to be under discussion.

## IMMEDIATE ACTION ITEMS

**Review all job postings.** Audit employment postings recruiting in Columbus across every platform and add reasonable salary ranges/scales in line with the factors discussed above.

## BOTTOM LINE

Columbus employers have likely already removed salary history inquiries from their interviewing and screening practices. Still, it never hurts to audit current practices and refresh employee training. In the lead up to the January 1, 2027 enforcement deadline, employers should review all job postings and ensure compliance with the new reasonable salary requirement.

## QUESTIONS?

In Ohio, the lack of statewide laws regulating salary history and transparency results in varied regional approaches. For employers with applicants in multiple Ohio cities, our labor & employment team stands ready to assist you with compliance questions, policy updates, or concerns about specific hiring situations. Please reach out if you would like to discuss how the new ordinance affects your organization or if you need assistance with implementation.

The full text of the ordinance as codified is available [here](#).

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