



To: Hawaii State Senate Committee on Commerce + Consumer Protection, and
Committee on Judiciary

RE: Testimony in SUPPORT of SB2386 SD1 Relating to Employment Earnings

Dear Chair Keohokalole, Vice Chair Fukunaga, Chair Rhoads, Vice Chair Gabbard, and
members of the Committees,

The members of AAUW of Hawai'i thank you for hearing this measure. We support SB2386 SD1, a measure which would require employers to disclose wage ranges on job listings; exempting employers having fewer than 25 employees, rather than 50. **We request that you amend SB2386 SD1 to remove the exemption for employers having fewer than 25 employees.** All employees deserve pay transparency and pay transparency is good for all businesses. According to DBEDT¹, about a third of Hawai'i's workforce work for businesses with fewer than 25 employees.

Pay transparency is one of the best employment practices according to a study by Payscale² and 82% of U.S. workers are more likely to consider applying for a job if pay range is included in the job posting according to a study by Society of Human Resource Management³. This bill with the requested amendment would make the best employment practice available to all employers and employees. This bill can make Hawai'i a leader in the area of pay equity.

- Research shows that workers stay longer and are more productive, when working for companies which treat them with dignity.
- A recent Harvard-Berkeley study showed that pay inequality decreased worker attendance, cooperation, and output.⁴
- Being up front about wages saves businesses time so that they are not interviewing candidates that will eventually turn them down. In addition to fairness, this is also about efficiency.⁵
- Salary ranges help employers including small businesses control their pay expenses and ensure pay equity among employees. It is critical that employers

¹ https://files.hawaii.gov/dbedt/economic/data_reports/DLIR/LFR_QCEW_ES2024FIRM.pdf

² <https://www.forbes.com/sites/josiec Cox/2024/03/20/pay-transparency-is-a-best-practice-in-corporate-america-study-finds/>

³ <https://www.shrm.org/topics-tools/news/all-things-work/pay-transparency-equity>

⁴ Emily Breza, Supreet Kaur & Yogita Shamdasanani 2016 "The Morale Effects of Pay Inequality," *NBER Working Papers*, National Bureau of Economic Research

⁵ Glassdoor, "Is Salary Transparency More Than a Trend", https://www.glassdoor.com/research/app/uploads/sites/2/2015/04/GD_Report_2.pdf

have rational explanations for why they pay their employees a certain rate, and defined salary ranges help accomplish that.⁶

Please pass this measure so pay transparency, one of best employment practices, can be a reality for all employees in Hawai'i. Thank you for your consideration.

Sincerely,
Younghee Overly
AAUW of Hawai'i Public Policy Committee

The American Association of University Women (AAUW) of Hawai'i is an all-volunteer, statewide chapter of a national organization with close to 4000 members and supporters across all four counties - Hawai'i, Honolulu, Kaua'i, and Maui. AAUW has state chapters in all 50 states and our mission is to advance gender equity through education and advocacy. Economic security for women is our goal.

⁶ Society for Human Resource Management, "How to Establish Salary Range",
<https://www.shrm.org/resourcesandtools/tools-and-samples/how-to-guides/pages/howtoestablishsalaryranges.aspx>



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March 4, 2026

TO: Sen. Jarrett Keohokalole, Chair
Sen. Carol Fukunaga, Vice Chair
Members of the Senate Committee on Commerce
and Consumer Protection

Sen. Karl Rhoads, Chair
Sen. Mike Gabbard, Vice Chair
Members of the Senate Committee on Judiciary

FR: Michael Iosua, State Director
NFIB, Hawaii Chapter

RE: **OPPOSITION** TO SB 2386, SD1 – RELATING TO EMPLOYMENT EARNINGS

Hearing date: March 4, 2026, at 9:25 AM

Aloha Chair Keohokalole, Chair Rhoads and members of the committees,

Mahalo for the opportunity to submit testimony on behalf of NFIB's Hawaii Chapter in **OPPOSITION** to SB 2386, SD1 – RELATING TO EMPLOYMENT EARNINGS. NFIB is a nonprofit, nonpartisan, and member-driven organization exclusively dedicated to small and independent businesses. With members in all four counties, NFIB's Hawaii chapter advocates on issues that affect Hawaii's small and independent business owners.

SB 2386, SD1 would amend HRS § 378-2.8 by removing the current exemption for businesses with fewer than fifty employees from the disclosure of compensation in job listings. This exemption that exists in current law acknowledges the limited administrative capacity of small businesses and the disproportionate cost that compliance imposes on enterprises with constrained resources.

Small businesses in Hawaii already face significant operational challenges, including high costs of doing business, tariffs and tight labor markets. Unlike other employers, many small businesses do not have dedicated HR departments or legal staff to manage an ever-expanding

set of employment law requirements. The added obligation to document and update wage and salary ranges for every job posting, coupled with the risk of enforcement actions for errors, represents a substantial administrative burden and potential liability for small businesses. What may appear to be a simple disclosure requirement necessitates the development and ongoing maintenance of formal compensation frameworks, systems for regular review of pay structures, and additional staff time and professional services — all of which carry costs that directly impact small businesses.

These burdens translate into higher compliance costs, additional time away from core business functions, and increased exposure to enforcement penalties. Particularly in Hawaii's tight labor market, small businesses compete for talent without the economies of scale enjoyed by larger employers. Mandating detailed pay disclosures for employers that are not equipped to comply will discourage hiring and remove the opportunity to grow the business. Some small businesses may choose to reduce staffing, refrain from creating new positions, or in the worst cases, shut down entirely rather than navigate an expanded regulatory landscape.

The current exemption for employers with fewer than 50 employees is a sensible balance between promoting transparency and recognizing the capacity limitations of small enterprises. For these reasons, we respectfully urge the Committee to defer SB 2386, SD1 and help to protect small businesses.



**Senate Committees on Commerce & Consumer Protection and Judiciary
Sen. Keohokalole, Chair
Sen. Rhoads, Chair**

9:25 am, March 4, 2026

RE: SB 2386, SD1, Relating to Employment Earnings

Aloha Chairs Keohokalole and Rhoads, Vice Chairs Fukunaga and Gabbard, and Members of the Committees:

The Society for Human Resource Management – Hawaii (“SHRM Hawaii”) respectfully opposes SB 2386, SD1, Relating to Employment Earnings.

SHRM Hawai'i respectfully opposes SB 2386, SD1. While we support transparency and equitable pay practices, removing the existing exemption for employers with fewer than 25 employees creates significant operational and compliance burdens for small and mid-sized organizations. Many smaller employers in Hawai'i do not have dedicated compensation analysts or in-house legal counsel; instead, HR responsibilities are often handled by a single professional—or even a business owner—managing multiple functions. Requiring formalized salary ranges for every full-time, part-time, temporary, or seasonal position demands technical compensation analysis, ongoing market benchmarking, and frequent updates that are resource-intensive and costly. For small employers already navigating Hawai'i's high cost of doing business, this mandate may be impractical and, in some cases, unworkable.

In addition, smaller organizations typically rely on flexible compensation structures that account for experience, specialized skills, and evolving business needs. Unlike large corporations with standardized pay bands, small employers must often tailor compensation to attract niche talent in a highly competitive labor market. Mandating rigid pre-disclosed salary ranges could inadvertently limit that flexibility, discourage negotiation, and reduce an employer's ability to respond quickly to market conditions. It may also create employee relations challenges if ranges are misinterpreted without the broader context of total rewards, including bonuses, commissions, benefits, housing stipends, or other non-wage compensation that are particularly relevant in Hawai'i's unique economic environment.

Thank you for this opportunity to provide testimony in opposition to this measure.

Erin Kogen and Maggie Batangan
Co-chairs, SHRM Hawaii Legislative Affairs Committee



SHRM Hawaii, P. O. Box 3175, Honolulu, Hawaii (808) 447-1840



Fujiwara & Rosenbaum, LLC

*Alahea Corporate Tower
1100 Alahea St., Fl. 20, Suite B
Honolulu, Hawaii 96813*

LATE

Senate Committee on Consumer Protection & Commerce

Senate Committee on Judiciary

Date: Wednesday, March 4, 2026, 9:25AM, Conf. Rm. 229

Re: Fujiwara & Rosenbaum Testimony on **S.B. No. 2386, H.D. 1, Relating to Employment Earnings in SUPPORT with AMENDMENTS**

Chairs Keohokalole and Rhoads, Vice-Chairs Fukunaga and Gabbard, and Members of the Committees:

Fujiwara & Rosenbaum, LLC, respectfully submits this testimony in support of S.B. No. 2386, S.D. 1, which would clarify that pay disclosure requirements apply to full-time, part-time, temporary, and seasonal employment, and would reduce the employer exemption threshold from fifty to twenty-five employees. While we support the bill's direction, we urge this Committee to amend S.B. No. 2386, S.D. 1 to **remove the employer size exemption entirely and to set a meaningful effective date**. Our firm has spent nearly forty years advocating for the civil rights of workers throughout Hawai'i. Our extensive experience litigating employment discrimination claims under HRS Chapter 378 provides us with a unique perspective on the importance of statutory consistency within Hawai'i's civil rights framework.

I. THE S.D. 1 AMENDMENTS REPRESENT PARTIAL PROGRESS

A. Clarification of Job Categories

We commend the Committee on Labor and Technology for clarifying that pay disclosure requirements apply to "full-time, part-time, temporary, and seasonal employment." This language provides needed clarity for employers and ensures coverage across all job categories.

B. The Reduced Exemption Threshold Is Insufficient

While S.B. No. 2386, S.D. 1 reduces the exemption threshold from fifty to twenty-five employees, this change does not go far enough. The Committee on Labor and Technology correctly found that "pay inequity is a prominent problem in the workforce that leads to wages being dragged down and the normalization of secrecy regarding compensation." The Committee further found that "a significant portion of businesses in the State were exempt due to having fewer than fifty employees."

Lowering the threshold to twenty-five employees addresses only part of this problem. Workers at employers with twenty-four or fewer employees will still lack the pay transparency protections afforded to workers at larger employers. This creates a two-tiered system that is inconsistent with Hawai'i's civil rights framework.

II. THE EXEMPTION SHOULD BE ELIMINATED ENTIRELY

A. Statutory Consistency Requires Universal Coverage

HRS § 378-2.8 remains the only provision in Part I of Chapter 378 that carves out small employers from coverage. Every other anti-discrimination protection in Chapter 378 applies to all employers with one or more employees:

- The prohibition on discriminatory practices (HRS § 378-2) applies to all employers.

- The prohibition of nondisclosure agreements in sexual harassment or sexual assault cases (HRS § 378-2.2) applies to all employers.
- The equal pay protections (HRS § 378-2.3) apply to all employers.
- The salary history ban (HRS § 378-2.4) applies to all employers.
- The fair-chance hiring provisions (HRS § 378-2.5) apply to all employers.

These protections did not require employer size thresholds. The Legislature recognized that civil rights protections should apply universally. The same principle should apply to pay transparency.

B. The Hawai'i Supreme Court Supports Universal Employer Coverage

In Sam Teague, Ltd. v. Hawai'i Civil Rights Commission, 89 Haw. 269, 971 P.2d 1104 (1999), the Hawai'i Supreme Court recognized that the Legislature "intended all employers, regardless of size, to be subject to the provisions of this chapter." Maintaining any employer size exemption contradicts this legislative intent.

C. Wage Disparities Are Harming Workers Now

Every day that passes without universal pay transparency is another day that discriminatory pay practices remain hidden from view. Workers in Hawai'i continue to face wage disparities based on race, sex, disability, age, and national origin.

Women in Hawai'i earn approximately 83 cents for every dollar earned by men. Native Hawaiian and Pacific Islander workers face significant wage gaps compared to their white counterparts. Workers with disabilities earn substantially less than workers without disabilities. Older workers are often offered lower salaries based on assumptions about their needs or productivity.

Pay transparency is one of the most effective tools for identifying and eliminating discriminatory pay practices. When job seekers know the expected salary range before applying, they can make informed decisions. When workers can compare their compensation to posted ranges for similar positions, they can identify potential discrimination. When employers must disclose salary ranges, they are incentivized to ensure their compensation practices are fair and defensible.

D. Delay Perpetuates Existing Inequities

A worker who accepts a position without knowing the salary range may start at a lower wage than similarly situated colleagues. That initial disparity follows the worker throughout their career, affecting raises, promotions, and retirement savings. Studies consistently show that early-career wage gaps grow larger over time.

For workers at small employers, where a significant portion of Hawai'i's workforce is employed, this harm has been ongoing since HRS § 378-2.8 took effect on January 1, 2024. More than two years have passed with these workers denied the pay transparency protections afforded to workers at larger employers. Every additional day of delay extends this inequity.

III. THE EFFECTIVE DATE MUST BE CHANGED

The placeholder effective date of January 1, 2077, was inserted "to encourage further discussion." Hawai'i workers cannot wait fifty years for pay transparency protections that should have applied to all employers from the beginning.

HRS § 368-1 declares that "the practice of discrimination because of race, color, religion, age, sex, including gender identity or expression, sexual orientation, marital status, national origin,

ancestry, or disability in employment... is against public policy." This declaration is a mandate. When the Legislature identifies a gap in civil rights protection, it should act to close that gap promptly.

We respectfully urge the Committee to amend S.B. No. 2386, S.D. 1 to provide an effective date of January 1, 2027. This date provides employers with adequate time to update their job posting practices while ensuring that workers receive these protections without undue delay.

The pay transparency requirement is not burdensome. Employers already determine salary ranges when budgeting for positions and making offers. The requirement simply asks employers to share this information with job seekers at the outset of the application process. Employers with fifty or more employees have been complying with this requirement since January 2024; there is no reason smaller employers cannot do the same.

IV. CONCLUSION

Fujiwara & Rosenbaum has seen firsthand how discriminatory pay practices harm workers and their families. Pay transparency is an essential tool for identifying and eliminating these practices.

We urge this Committee to amend S.B. No. 2386, S.D. 1 to:

1. **Remove the employer size exemption entirely**, aligning HRS § 378-2.8 with the definition of "employer" in HRS § 378-1 and with every other provision in Part I of Chapter 378; and
2. **Amend the effective date to January 1, 2027**, ensuring that workers receive these protections without further delay.

Workers at small employers have waited long enough. Pay disparities based on race, sex, disability, age, and national origin continue to harm Hawai'i families every day. The time for universal pay transparency is now.

Thank you for this opportunity to testify.

LATE

SB-2386-SD-1

Submitted on: 3/4/2026 12:16:17 AM

Testimony for JDC on 3/4/2026 9:25:00 AM

Submitted By	Organization	Testifier Position	Testify
HSDWC	Testifying for Hawai`i State Democratic Women's Caucus	Support	Written Testimony Only

Comments:

Aloha Chair Keohokalole, Chair Rhoads and members. This Caucus is in strong support of this measure as indicated in past testimony.

Mahalo,

Ann S. Freed, Co-Chair, Hawai`i State Democratic Women's Caucus

SB-2386-SD-1

Submitted on: 2/27/2026 3:47:55 PM

Testimony for JDC on 3/4/2026 9:25:00 AM

Submitted By	Organization	Testifier Position	Testify
Sandy Ma	Individual	Support	Written Testimony Only

Comments:

Aloha Chairs Keohokalole and Rhoads, Vice Chairs Fukunaga and Gabbard, and Members of the Commerce and Consumer Protection and Judiciary Committees,

I am a member of AAUW of Hawai‘i. I am testifying in support of SB 2386, SD1, clarifying that the requirement to disclose hourly rates or salary ranges on job listings applies to full-time, part-time, temporary, or seasonal employment and exempting employers having fewer than twenty-five employees, rather than fifty, from the disclosure requirement.

In 2023, Hawai‘i adopted a pay transparency bill which required employers with fifty or more employees to make wage range information available in job listings.

Unfortunately, even with the 2023 legislation, we still currently see in Hawai‘i the gender pay gap continuing. Women working full-time in Hawai‘i earned 87.54% of what men earned in 2023 (<https://www.aauw.org/resources/article/gender-pay-gap-by-state/>) and the gender pay gap is present in 74% of jobs in Hawai‘i (<https://manoa.hawaii.edu/news/article.php?aId=13272>).

While SB 2386, SD1 will require employers with 25 or more employees (versus employers with 50 or more employees in the 2023 legislation) to practice pay transparency, this will not be sufficient to end this disparity. 20% of the Hawai‘i workforce work for businesses with 19 or fewer employees. See https://files.hawaii.gov/dbedt/economic/data_reports/DLIR/LFR_QCEW_ES2024FIRM.pdf.

Therefore, I respectfully ask you to amend SB 2386, SD1 to cover all Hawai‘i employers regardless of size. Gender pay gap penalizes all households in Hawai‘i, as many households rely on the paychecks of more than one household member. Gender pay gap penalizes children excessively, because many children reside in female-headed households.

Please amend SB 2386, SD1 so that all employers must practice pay transparency and pass SB 2386, SD1 out of your Committee. Mahalo!

Sandy Ma

SB-2386-SD-1

Submitted on: 2/27/2026 7:48:34 PM

Testimony for JDC on 3/4/2026 9:25:00 AM

Submitted By	Organization	Testifier Position	Testify
Elizabeth Hansen	Individual	Support	Written Testimony Only

Comments:

Please support this bill. Pay transparency is good for all employees and employers regardless of the size of the business. Please remove the exemption for all employers as HB2367 does.

Mahalo

Elizabeth Hanen / Hakalau HI 96710

Hearing Date: Wednesday, March 5, 2026, 9:25 AM Room 229

To: Senate Committee on Commerce & Consumer Protection
Chair, Senator Jarrett Keohokalole
Vice Chair, Senator Carol Fukunaga

Senate Committee on Judiciary
Chair, Karl Rhoads
Vice Chair Mike Gabbard

From: Jean Evans, (Individual)

Re: TESTIMONY IN SUPPORT OF SB 2386, SD1 RELATING TO EMPLOYMENT EARNINGS

Dear Chairs Keohokalole and Rhoads, Vice Chairs Fukunaga and Gabbard and Committee members,

My name is Jean Evans. I retired after 40 years holding executive positions in Hawaii non-profit agencies. In these positions I have interviewed and hired hundreds of applicants. I am also a member of AAUW Hawaii.

I support of SB 2386, SD1 Relating to Employment Earnings

SB 2386, SD1 expands equal pay protections in Hawaii. It builds upon Act 203 that was passed in 2023, which requires employers with fifty (50) or more employees to make wage range information available in job listings. This measure expands that requirement down to companies with more than twenty-four (24) employees.

It is well documented that there remains a large gap in gender pay across the nation and in Hawaii where women earned only 87.54% of what men earned in 2023. This pay-gap hits women especially hard here in Hawaii with our notoriously high cost of living often making it very difficult to make ends meet.

While I support this next expansion step, I strongly urge you to go even further in ensuring pay transparency by not limiting this requirement to only companies with more than 24 employees, by entirely removing the limit and making this applicable for all employees.

According to DBED (Hawaii Department of Business, Economic Development and Tourism) 20% of workforce (or 159,113 workers) work for businesses with 19 or fewer employees. Many of these jobs are in the service and non-profit sectors. Non-profit agencies in Hawaii have historically offered low salaries which did not reflect the level of

education, experience and responsibility associated with the positions. These agencies, which were predominately filled by females with a few male top executives, were seen as helping and giving organizations and so perpetuated the idea that the women should work for lower wages for the good of the community. Slowly this mind-set is changing to reflect a more professional attitude toward the non-profit workforce. However, this change has been slow and contributes to the state-wide wage gap.

Over the years I have held two executive director positions in agencies with fewer than 24 employees here in Hawaii. When I applied for the first one, I had no idea of the salary range, or even if there was one. When I inquired about the salary I was told only that it was “flexible”. That response did not give me a clue as to what to expect. Only after being in that position, with a salary I thought fair, did I discover to my dismay and embarrassment that my predecessor’s salary was over **twice** what mine was. The offered salary amount seemed arbitrary and unfair and got me looking for positions elsewhere. This situation continues today.

As an executive seeking to hire qualified people, I interviewed many good candidates only to find out that their salary requirements were higher than I could offer. If I had been required to post the ranges I could have saved their time and mine. Based on the budget, I knew what the salary ranges were, but formally posting those was not the customary way recruitment was done. I realize now that compensation transparency would have helped me both as an employer and employee.

Employee turnover continues to be a problem in Hawaii, especially when unemployment is low. This bill, especially if it includes the modification I am suggesting to cover all employees, is an important step in reducing turnover by ensuring competitive salaries, equal treatment, and assisting employers to control their expenses with set pay ranges.

Employers always complain about new requirements. I certainly did, but I also found that most times what we really needed was a nudge to make the change and often found that the change resulted in improvements in efficiency, safety or fairness, and made good business sense.

Let Hawaii become a leader in the area of salary transparency by passing this legislation, with the recommended modification, as another step toward leveling salary discrepancies and retaining talented employees. I see this measure as a win for both employers and employees. I encourage your support for this bill.

Mahalo for allowing me to submit my testimony today.

SB-2386-SD-1

Submitted on: 2/28/2026 8:27:11 PM

Testimony for JDC on 3/4/2026 9:25:00 AM

Submitted By	Organization	Testifier Position	Testify
Erika Cabell	Individual	Support	Written Testimony Only

Comments:

Pay transparency is good for all employees and employers regardless of the size of the business. Please remove the exemption for all employers as HB2367 does.

COMMITTEE ON COMMERCE AND CONSUMER PROTECTION
Senator Jarrett Keohokalole, Chair
Senator Carol Fukunaga, Vice Chair

SENATE COMMITTEE ON JUDICIARY
Senator Karl Rhoads, Chair
Senator Mike Gabbard, Vice Chair

HEARING:

Wednesday, March 4, 2026 at 9:25 am
Conference Room 229 & Videoconference

TESTIMONY IN SUPPORT OF SB 2386, SD1 - RELATING TO EMPLOYMENT EARNINGS.

Aloha Chair Keohokalole, Chair Rhoads, Vice Chair Fukunaga, Vice Chair Gabbard, Senator McKelvey of Maui, and Members of the Committee,

My name is Christine Andrews, and I live in Wailuku, Maui. I write to you today in **support of SB 2386, SD1**, Relating to Employment Earnings. I worked on gender equity in STEM as a workforce development for many years, and wrote over ten peer-reviewed papers on best practices in the field. I also owned a small business on Maui for over 23 years and understand that the outcomes intended by SB 2386 place no burden on employers, while benefiting employees and improving pay equity.

The goal of this bill is to establish Hawaii as a leader in the field of pay equity, as Hawaii has led the way in civil rights. The gender pay gap persists despite progress made in women's labor participation. Women working full-time in Hawai'i earned 87.54% of what men earned in 2023¹ and gender pay gap is present in 74% of jobs in Hawai'i². Hawai'i is considered as a state with moderate equal pay protection³. California, Colorado, Illinois, Maryland, Massachusetts, New Jersey, New York, Oregon, and Washington are considered as states with strong equal pay protection. While passage of Act 203 in 2023 was a big step towards ensuring pay equity, this bill would increase pay transparency for **all employers** and provide a strong equal pay protection with a minimal cost or disruption to employers.

While Act 203 of 2023 requires employers with fifty or more employees to make wage range information available in job listings to encourage pay equity, SB2386 builds upon this to require **all employers** to make wage range information available in job listings.

Please consider the following research in support of this measure:

- Pay transparency has become a best practice according to a study by Payscale⁴
- Pay transparency required by Act 203 of 2023 doesn't help one-third of the workforce who work for businesses with 49 or fewer employees, according to DBEDT⁵
 - 20% of workforce work for businesses with 19 or fewer employees
- 82% of U.S. workers are more likely to consider applying for a job if pay range is included in the job posting according to a study by Society of Human Resource Management⁶

¹ <https://www.aauw.org/resources/article/gender-pay-gap-by-state/>

² <https://manoa.hawaii.edu/news/article.php?aId=13272>

³ https://www.aauw.org/app/uploads/2020/10/SimpleTruth_States_2020update.pdf

⁴ <https://www.forbes.com/sites/josiecox/2024/03/20/pay-transparency-is-a-best-practice-in-corporate-america-study-finds/>

⁵ https://files.hawaii.gov/dbedt/economic/data_reports/DLIR/LFR_QCEW_ES2024FIRM.pdf

⁶ <https://www.shrm.org/topics-tools/news/all-things-work/pay-transparency-equity>

- Research shows that workers stay longer and are more productive, when working for companies which treat them with dignity. A recent Harvard-Berkeley study showed that pay inequality decreased worker attendance, cooperation, and output.⁷
- Being up front about wages saves businesses time so that they are not interviewing candidates that will eventually turn them down. In addition to fairness, this is also about efficiency.⁸
- Salary ranges help employers control their pay expenses and ensure pay equity among employees. It is critical that employers have rational explanations for why they pay their employees a certain rate, and defined salary ranges help accomplish that.⁹
- Gender pay gap penalizes all households in Hawaii, since many households rely on the paychecks of more than one household member. Gender pay gap penalizes children excessively, because many children reside in female-headed households. If the \$11,067 annual gender pay gap is eliminated, a working woman in Hawaii would have enough money to purchase 6 months of rent, 10 months of healthcare premium, and 9.6 months of child care¹⁰.

Based upon my experience promoting best practices in equity, as a small business owner for over 23 years, I ask that you **support SB 2386, SD1** and thank you for holding a hearing on this important measure.

Christine L. Andrews, J.D.
Wailuku, Maui

⁷ Emily Breza, Supreet Kaur & Yogita Shamdasanani 2016 “The Morale Effects of Pay Inequality,” *NBER Working Papers*, National Bureau of Economic Research

⁸ Glassdoor, “Is Salary Transparency More Than a Trend”,
https://www.glassdoor.com/research/app/uploads/sites/2/2015/04/GD_Report_2.pdf

⁹ Society for Human Resource Management, “How to Establish Salary Range”,
<https://www.shrm.org/resourcesandtools/tools-and-samples/how-to-guides/pages/howtoestablishsalaryranges.aspx>

¹⁰ <https://nationalpartnership.org/report/wage-gap/>

SB-2386-SD-1

Submitted on: 3/1/2026 8:13:26 PM

Testimony for JDC on 3/4/2026 9:25:00 AM

Submitted By	Organization	Testifier Position	Testify
Jeanne Ohta	Individual	Support	Written Testimony Only

Comments:

I support SB2386 SD1 RELating to Employment Earnings. This bill would improve pay equity by increasing pay transparency for all employees of Hawaii and provide stronger equal pay protection. According to the Department of Business Economic Development and Tourism, in 2023 Hawaii had 7,236 businesses with 49 or fewer employees. Increasing coverage to all employees would extend protections to well more than 100,000 additional employees and possibly to more than 200,000 additional employees. Pay transparency has become a best practice according to Payscale (<https://www.forbes.com/sites/josiecox/2024/03/20/pay-transparency-is-a-best-practice-in-corporate-america-study-finds/>)

Please pass pay transparency for all employees in Hawaii.

SB-2386-SD-1

Submitted on: 3/2/2026 11:29:28 AM

Testimony for JDC on 3/4/2026 9:25:00 AM

Submitted By	Organization	Testifier Position	Testify
Christian McKee	Individual	Support	Written Testimony Only

Comments:

I strongly support this bill

SB-2386-SD-1

Submitted on: 3/2/2026 9:23:57 PM

Testimony for JDC on 3/4/2026 9:25:00 AM

Submitted By	Organization	Testifier Position	Testify
Nalu Meyers	Individual	Support	Written Testimony Only

Comments:

In strong support

SB-2386-SD-1

Submitted on: 3/3/2026 7:23:41 AM

Testimony for JDC on 3/4/2026 9:25:00 AM

Submitted By	Organization	Testifier Position	Testify
Nancy Rustad	Individual	Support	Written Testimony Only

Comments:

Hawaii can be a leader in pay equity and was making significant progress in reducing the gender pay gap until a few years ago. However, the gap persists and is present in 74% jobs in Hawaii.

Salary transparency plays a role in ensuring pay equity and can do so with minimal cost or disruption to employers. Act 203 of 2023 was a step in the right direction by requiring employers with fifty or more employees to make wage range information available in job listings. SB2386 continues this progress, but please remove the exemption all together so that this applies to ALL employers as does HB2367.

In my personal experience as a manager, I can attest that sharing such pay range information upfront saved me time and money. I could conduct an interview process efficiently knowing that job candidates were aware of their potential salary range. Also, in this day and age, I found job candidates will ask if the information is not forthcoming.

Please support SB2386 with the exemption removed all together.

Sincerely,
Nancy Rustad
Kamuela, HI