DEPARTMENT OF LABOR AND INDUSTRY

Memo

Date: Dec. 17, 2025
To: NHWSB Data Workgroup
From: Leah Solo

RE: Wage data comparisons

As the NHWSB Data Workgroup has discussed the categories and sources of data for the board to track on an ongoing basis, there has been significant discussion about options for wage data. The board has discussed many times how there is no perfect data set, but that the Workforce Incentive Grant (WFIG) data in 2023 was particularly useful to the board because it was focused on a wage rate without additions to the wage, such as premium pay, and it was also a very broad sample. Unfortunately, that was a one-time data sample and the workgroup has been trying to determine other ways to obtain key wage data moving forward.

Below is a summary of the options discussed and how they compare with the WFIG data and each other.

Cost report data

The most obvious data to use would be wage data from the cost report. This data is reported directly from the nursing facilities to the Department of Human Services (DHS), is focused on wages rates in relation to reimbursement rates of nursing homes reimbursed under Minnesota Statutes 256R, can be broken out by occupations and locations, and is already collected regularly. However this wage data includes "roll up" payments beyond the wage per hour, such as shift differential and holiday pay, and often groups multiple occupations together, sometimes including occupations that count as "workers" under the Nursing Home Workforce Standards Board (NHWSB) Act with those that are excluded from the definition of "worker" in the same category.

Table 1: Comparing WFIG and cost report from 2023

	CNA	Cook[1]	Dietary aide	House-keeping	Activity aide[2]	Laundry	LPNs	RNs	Nursing admin.
Cost report average	$23.94	$18.87	$18.87	$17.90	$21.23	$18.00	$33.35	$42.80	$45.85
WFIG median	$20.30	$19.68	$16.06	$16.99	$16.82	Not reported	Not reported*	Not reported	Not reported
WFIG/cost report	85%	95%[3]	See cook column, combined	95%	79%	N/A	N/A	N/A	N/A

Other wage data sets

There are two data sets the workgroup has continued to examine.

1. **Occupational Employment and Wage Statistics (OEWS) from the U.S. Bureau of Labor Statistics** – bls.gov/oes/oessrcres.htm

Description:
OEWS data is nationally reported wage data that can be distilled by industry, occupation and geography for average wages and number of employees.

This data does not include premium pay, but includes hazard pay. It also does not include owners of the place. More information about OEWS data, including methodology, potential usages and limitations, is available in the frequently asked questions.

What it could tell the board:
Wage data and number-of-employees data by both industry (using the North American Industry Classification System (NAICS) code for skilled nursing facilities) and by specific jobs, including nursing assistants and many other positions the board frequently discusses. The board can track changes in average wages and number of employees over time, which could be very useful.

However, note:

- This data is from a survey, so there can be a sampling error.

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[1]The cost report combines cook with dietary aide, which is categorized as dietary.

[2]The cost report combines all activities staff members.

[3]This was calculated by finding the average of the cook and dietary aide WFIG median wages and dividing by the cost report dietary wage, which combines these roles.

- Not all facilities using the NAICS code for skilled nursing facilities count as nursing homes under the NHWSB Act, so the aggregated employment and wage data will be partially based on data from facilities not under the jurisdiction of the NHWSB Act.
- Not all occupations listed count as workers under the NHWSB Act and, within some occupations, there could be a mix of NHWSB Act workers and non-workers. For instance, the OEWS data does not indicate if directors of nursing are included under management positions or under registered nurses. As a result, the aggregated employment and wage data may also be partially based on data from employees who do not fall under the jurisdiction of the NHWSB Act.

Table 2: Comparing WFIG and cost report with OEWS from 2023

	CNA	Cook[4]	Dietary aide	House-keeping[5]	Activity aide[6] [7]	Laundry	LPNs	RNs	Nursing admin.
OEWS average	$20.28	$19.65	$16.11	$16.72	$17.86	$16.83	$28.68	$37.43	Not reported
WFIG median	$20.30	$19.68	$16.06	$16.99	$16.82	Not reported	Not reported	Not reported	Not reported
WFIG/OEWS	100%	100%	100%	102%	94%	N/A	N/A	N/A	N/A
Cost report average	$23.94	$18.87	$18.87	$17.90	$21.23	$18.00	$33.35	$42.80	$45.85
OEWS/CR	85%	95%[8]	See cook column	93%	84%	94%	86%	87%	

Analysis

OEWS tracks quite close to WFIG, with most median incomes nearly matching. The outlier is the activity aide role, with OEWS median income being 94% of WFIG's. In comparing OEWS to the cost report, the roles with certification and licenses appear to have a bigger gap between the cost report and OEWS. One possible explanation for this could be that those roles are often needed for additional shifts and overtime. This could cause the cost report to reflect higher wages.

2. **Quarterly Census of Employment and Wages (QCEW) from the Department of Employment and Economic Development (DEED)** – apps.deed.state.mn.us/lmi/qcew/ResultsDisp.aspx

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[4]The cost report combines cook with dietary aide.

[5]The OEWS data set lists maids and housekeeping cleaners, which is the closest category to the WFIG data.

[6]The OEWS data set lists recreation workers, which is the closest category to the WFIG data.

[7]The cost report combines all activities staff members, which is categorized as activities.

[8]This was calculated by finding the average of the cook and dietary aide OEWS average wages and dividing by the cost report dietary wage, which combines these roles.

Description of data:

QCEW data is a census of all employers who report unemployment insurance (UI) data, average weekly wages and number of employees. The data includes all wages paid and total hours worked, which includes premium pay.

What the data could tell the board:

This data could help track how the nursing home industry is faring in relative terms over time and compared to other industries. For instance, is there overall wage growth in the industry? Is the number of employees increasing or decreasing in the industry? Relative to hospitals and assisted living facilities, are the wages of nursing home workers increasing or decreasing?

While the board may not be able to draw direct causation between the actions of the board and changes within the industry – or compared to other industries, these can be benchmarks to watch.

However, note:

- Not all nursing facilities count as nursing homes under the NHWSB Act, so aggregated data would be partially based on facilities not under the jurisdiction of the NHWSB Act.
- Not all employees included in the weekly wages count as workers under the NHWSB Act and this data cannot be broken out by job title.

Additionally, the board would likely want to consider additional caveats when comparing this data across industries, particularly when examining wage data:

- The types of workers in each industry. For instance, one could assume hospitals include many doctors in their weekly wages, contributing to a higher average weekly wage than that of nursing facilities. On the other hand, nursing facilities likely have more registered nurses on staff than an assisted living facility, potentially contributing to the lower average weekly wage that the assisted living staff members make.
- Size of the industry. Each industry is quite different in size and purpose. This will contribute to differing wages.

Table 3: QCEW data in weekly wages

	Nursing facility	**Assisted living facility**	**Hospital**
QCEW weekly wages	$845	$702	$1,587

Analysis

Because QCEW is done as weekly wages, this might be difficult to compare with the other data sets. However, it is useful to see these wages compared to other industries.

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