ALTERNATIVES TO THE LOCAL PROPERTY TAX FOR EDUCATIONAL FINANCE

Thomas F. Hady

If we could get a nickel for every time the demise of the property tax has been predicted in this century, we probably could invest the proceeds and use the interest to finance a program of property tax reform. In a sense, this subject is old.

In another sense, however, there is something very new about discussing alternative ways of raising money for local governments. In August 1971, the California Supreme Court issued its decision in the now well-known case of Serrano v. Priest; in March 1973, the U.S. Supreme Court overturned a similar ruling by a lower court in Texas.[1] The Court ruled that the present system of financing local schools in California, which relies heavily on the property tax, unconstitutionally "conditions the full entitlement to such interest on wealth, classifies its recipients on the basis of their collective affluence and makes the quality of a child's education depend upon the resources of his school district and ultimately upon the pocketbook of his parents." Since that time, more than 50 similar suits have been filed in some 31 states, and the U.S. Supreme Court is reviewing an appeal from Texas in a case similar to Serrano.

In March 1973, the U.S. Supreme Court overturned a lower court ruling in a Texas case similar to Serrano, finding that the Texas system of school finance did not violate the equal protection clause of the 14th Amendment. Only time will tell what effect this ruling will have on school finance systems in the states. However, issues of the way we finance our schools have caught the attention of the public, and it seems likely that the effect of the Rodriguez decision will be to transfer the issue to the state legislatures, rather than to cause its demise. Indeed, Justice Powell may have been suggesting as much when he wrote in the Rodriguez decision that "The consideration and initiation of fundamental reforms with respect to state taxation and education are matters reserved for the legislative processes of the various states, and we do no violence to the values of federalism and separation of powers by staying our hand. We hardly need add that this Court's action today is not to be viewed as placing its judicial imprimatur on the status quo. The need is apparent for reform in tax systems which may well have relied too long and too heavily on the local property tax."

This paper concentrates on alternative sources of revenue for school finance. In order to keep the subject manageable, it makes no attempt to analyze the issues involved in the public choice involved in allocating resources to education vs. other public and private goods and services; it assumes a given level of state-wide spending on education. For similar reasons, the issues involved in alternative state aid formulas are left for other papers by other analysts.

THE PROPERTY TAX AND EDUCATIONAL FINANCE

Some 20 percent of the pupils in the U.S. are enrolled in schools operated by school districts which are subunits of other local governments, commonly counties or municipalities. For these districts, revenue data are hard to obtain. For the remaining 80 percent of the pupils, however, data are available. They show that the property tax accounted for $10.6 billion, 46.8 percent of the total revenues of independent

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[1] Serrano v. Priest, 487 P2d 1241 (1971); San Antonio Independent School District v. Rodriguez, U.S. 1973.

school districts in 1966-67. Another 40.1 percent came from state aids.[2]

Property values are not evenly distributed. If you array all the school districts in each state according to property value per student, the median state will show a ratio of about nine to one between the richest district and the poorest. Even if you leave out the five percent of the districts at either end of the array, the district at the 95th percentile will still have about three times as much property per pupil as will the 5th percentile district.[3]

This inequality in property tax base has led to the Serrano decision and its sequels. Some proponents seem to say that the property tax must be replaced as a source of funds for schools. Others say merely that the effects of the unequal distribution of the base of this tax must be somehow ameliorated. In either event, it is clear that the amounts of money involved will be substantial.

Furthermore, it seems likely that the equalizing process will require substantial amounts of new money. Parents who are used to sending their children to good schools are not likely to sit idly by while expenditures in those schools are brought down to the state-wide average. It seems likely that legislatures will find it necessary to "average up" if they set out to equalize expenditures. If all school districts in each state who spend less than the median expenditure per pupil in that state were to raise their spending to the median, it would add only $1.3 billion to total school expenditures of around $32 billion in 1969-70 (Table 1). If they were all to be raised to the higher expenditure represented by the 70th percentile of present spending in the state, $2.6 billion would be required; the 95th percentile would add nearly $9 billion, more than a 25 percent increase. These figures do not allow for any interstate equalization; inspection of Table 1 will reveal wide differences among states in levels of expenditure.

ALTERNATIVE SOURCES OF LOCAL REVENUE

At least two sources of local revenue might be considered: the income tax and the sales tax. There is much to be said for permitting local units of government to use one or both of these taxes as an additional source of revenue for general governmental purposes. As a means of financing schools, however, they appear to share a flaw which probably is a fatal one: The bases of these taxes, too, are very unequally distributed among school districts. Studying the five states of Washington, Michigan, North Carolina, Delaware, and New Hampshire, for example, Levin found that the coefficient of variation for income per pupil among school districts was 0.42; for property per pupil it was 0.38.[4] Rossmiller, studying a sample of districts enrolling more than 1,500 pupils in eight states, found coefficients of variation of 0.27 for property value per pupil and 0.40 for retail sales per capita in school districts in 35 "small cities" of 10 to 25 thousand population. He found coefficients of variation of 0.87 for property and 0.36 for sales in districts in 35 "small towns" of less than 10,000 population.[5] (Rossmiller also found coefficients of variation for "effective buying income" per capita of 0.14 in small cities and 0.18 in small towns; these results are at variance with the coefficient of 0.42 found by Levin.) Orazem and Janssen found variations among school districts in Kansas ranging from over $125,000 property value per pupil to less than $3,500, and in income per pupil from over $8,000 to under $1,400.[6]

It would be perfectly possible, of course, for variations in the various tax bases to cancel one another out. In other words, the variance of fiscal capacity among school districts might be acceptably small under a tax system which reached property, sales and income, even though it was unacceptably large for any one of the three taxes. Some evidence on this point will be provided by a study now under way by Arthur Walrath, covering counties (not school districts) in the Appalachian region. Preliminary results of this study suggest that there are no simple generalizations, but there may be some tendency for counties with low property valuations to also have low income and sales tax bases. Rossmiller, on the other hand, found no significant correlations among property value per pupil, retail sales per capita, and

[2] U.S. Bureau of the Census, Census of Governments, 1967, Vol. 4, No. 1, *Finances of School Districts*, U.S. Government Printing Office, Washington, D.C., 1969, p.10.

[3] Barr, Richard, et. al., "Review of Existing State School Finance Programs," Staff Report, President's Commission on School Finance, 1971, p. 14.

[4] Levin, Betsy, et. al., Public School Finance: Present Disparities and Fiscal Alternatives, Vol. 1., report prepared for the President's Commission on School Finance, Jan. 1972, p. 61.

[5] Rossmiller, Richard A., et. al., *Fiscal Capacity and Educational Finance: Variations among States, School Districts and Municipalities*, National Educational Finance Project, Gainesville, Fla.; Wisconsin Univ., Madison, Sept. 1970, p. 78.

[6] Orazem, Frank and John R. Janssen, *Financing Local Schools*, Extension Service, Kansas State Univ., Manhattan, C-463, Sept. 1972.

effective buying income per capita.[7] However, the applicability of his results, to one primarily interested in rural problems, is sorely limited by his sample design.

To summarize the conclusions so far, then, the evidence is not really clear, but it strongly suggests that the bases of sales and income taxes are as variable as is the base of the property tax. If variations among school districts in the property tax base are thought objectionable, the other taxes are likely to be subject to similar objections. This suggests that we ought to consider the possibilities available for increased state funding.

INCREASED STATE FUNDING

Public finance specialists, in analyzing the incidence of taxes, are coming to recognize that it makes little sense to talk about one tax in isolation. Hence, they tend to work in terms of the incidence of a tax and the expenditures it finances, often called the budget incidence of the tax, or in terms of the way one tax affects the income distribution in comparison with another tax that would raise the same revenue, called the differential incidence of the tax.

We have similar problems here. In a sense, it is impossible to say much about increased state funding of education without discussing the way in which the state will allocate the funds, as well as the taxes it will use to raise those funds. A very regressive form of sales tax, for example, might be distributed in such a fashion that the combined effect of the tax and expenditure was progressive. Forms of state aids to local schools, however, are beyond the scope of this paper.

This paper, then concentrates primarily on something akin to the differential incidence model. Our purpose is to analyze the alternative ways in which revenue could be raised for increased state participation, and it is assumed, implicitly, that the way the revenue is distributed remains the same, regardless of how it is raised. It is then possible to compare among alternative ways of raising the revenue.

Back in 1776, Adam Smith suggested that taxes should be evaluated on their conformance to four principles: equality, certainty, convenience of payment and economy in collection.[8] These principles are still cited, but they lose something in application to modern institutions. I prefer Walter Heller's more modern restatement. Taxes can be evaluated on the basis of their conformance with our ideas of social justice, consistency with economic goals, ease of administration and compliance, and revenue adequacy.[9]

Social Justice

There are three basic types of taxes to be evaluated: a state-wide property tax, an income tax, and a sales tax (including its variant, the value added tax). If this section is to analyze these taxes in terms of equity, we need some agreement on what equity is. Unfortunately, equity is not susceptible to precise scientific definition. But we economists can provide some data on which judgment about equity can be based.

The local property tax, as presently administered, correlates very poorly with the incomes of the individuals on whom it is levied.[10] Evidence on whether it is regressive is mixed. Netzer concludes that it "is more or less proportional in its incidence among income groups."[11] Clearly, part of the variation in the tax on individuals with equal incomes comes from poor assessment. If the states were to take over the property tax as a major revenue source, one effect might be to improve the administration of this often poorly administered tax.

But there are other sources of inequities which do not yield so easily. For example, most states exempt intangibles because they are so easy to conceal from the tax assessor. But, this means that two individuals may have the same income and the same value of property, but pay greatly different taxes because one owns real estate and the other owns corporate bonds.

In theory, at least, a state income tax can be adjusted to conform quite closely to whatever definition of equity -- relative to income -- we want it to. The median state income tax rate in 1970 for a married couple with two dependents rose from 0.45%

[7] Op. cit., p. 79.

[8] Smith, Adam, *An Inquiry into the Nature and Causes of the Wealth of Nations,* Modern Library edition, pp. 777-778.

[9] Heller, Walter W., "Taxation," *Encyclopedia Britannica,* 21:839-841, 1964.

[10] See, for example, Netzer, Dick, *Economics of the Property Tax,* Washington, Brookings, 1966, p. 165.

[11] Ibid., p. 164.

on an adjusted gross income of $5,000 to 3.8% on an adjusted gross income of $50,000.[12] The more interesting question, though, is the extent to which actual burdens of the tax, relative to, say, current money income, are progressive. Here it is possible to get lost in a morass of different assumptions about income bases, methods of allocation, treatment of the fact that state income taxes are deductible on Federal returns, etc. A recent study by Bridges suggests that in the aggregate, state and local income taxes are sharply progressive.[13]

On the other hand, if one compares the net cost to the taxpayer, after taking account of the fact that he can deduct his state income tax payments in calculating his Federal liability, there is a distinct tendency for actual tax rates to fall off in the higher income levels.[14] Indeed, this has been referred to as a form of state-initiated revenue sharing.[15]

Sales taxes are commonly regarded as regressive. Bridges found regressivity both when taxpayers were ranked by income and when they were ranked according to a welfare ratio.[16] There are, however, ways of alleviating this problem. Eighteen states fully or partly exempt food and thirty do the same for medicine – one recognized way of reducing the regressivity of the tax.[17] A more recent trend is to provide a credit, through the income tax, for the first X dollars of sales tax paid.[18] This arrangement is now in use in some seven states.[19]

From the viewpoint of horizontal equity -- equal treatment of equals -- both the income tax and the general sales tax probably get better marks than does the property tax. One need only consult any standard public finance textbook, however, to find that erosion of the bases of these taxes – exemption of various types of income or types of goods and services – materially interferes with horizontal equity.

There is, of course, an entirely different philosophy of equity: Taxes should be distributed among taxpayers in proportion to the benefits they receive from the government. In this case, such a criterion presumably means that taxes should be apportioned among families in proportion to the benefits they receive from public education. The difficulty, of course, is the lack of information on how the benefits of public education are distributed among taxpayers. Without these data, there is little we can say about particular taxes.

Consistency With Economic Goals

Equity is only one criterion for judging taxes. Another is that they should not interfere with our established economic goals, such as price stability, full employment, and optimal allocation of resources. All three taxes present potential problems on the last count.

The effects of the property tax on the intensity of land use – particularly in urban areas -- has been a subject of discussion at least since the days of Henry George. Essentially, the argument is that the property tax increases the cost of investments in buildings and other improvements relative to other investments, and therefore, reduces investment in these improvements below that which would obtain under a competitive equilibrium. Given all the necessary assumptions for a position of competitive equilibrium to be one of Pareto optimality (and vice-versa), the result is a less-than-optimal distribution of resources.[20]

Similar problems arise under the general sales tax. Since this tax usually is not as "general" as its name implies, it tends to raise the costs of those items -- goods, primarily – on which it falls, relative to items such as services which commonly are not taxed. Hence, it may distort resource allocation.

The argument over the income tax is more complicated. Much controversy surrounds the problem of the effects of income taxes on incentives

[12] Advisory Commission on Intergovernmental Relations, *State-Local Finances: Significant Features and Suggested Legislation,* Washington, Government Printing Office, 1972, p. 197.

[13] Bridges, Benjamin, "Family Need Differences and Family Tax Burden Estimates," *National Tax Journal,* Dec. 1971, p. 423.

[14] This is particularly true if Federal income taxes are a state deduction. See Melichar, Emanuel, *State Individual Income Taxes,* Univ. of Conn., Storrs Agr. Expt. Sta., Monograph 2, July 1963.

[15] Moscovitch, Edward, "State Graduated Income Taxes -- A State-Initiated Form of Federal Revenue Sharing," *National Tax Journal,* March 1972, p. 53.

[16] Op. cit.

[17] ACIR, *State-Local Finances,* op. cit., p. 191.

[18] One good description is in Ecker-Racz, L. L., *The Politics and Economics of State-Local Finance,* Englewood Cliffs, Prentice-Hall, 1970, p. 60.

[19] ACIR, *State-Local Finances,* op. cit., p. 178.

[20] For a more complete discussion, see Netzer, op. cit., ch. IV.

to work and to invest.[21] It seems fair to say that we really do not know how the incentive effects of the income tax compare with the property tax or the sales tax, although I believe a majority of economists would opt for the income tax as having the least effect on incentives.

Ease of Administration and Compliance

Change to a statewide property tax would probably require a change to state control of the assessment function in states where this is now a local activity. A minimum requirement would be a good sales/assessment ratio program and intrajurisdictional equalization of assessments for state tax purposes. To do otherwise would invite competitive undervaluation in local assessment districts. The Serrano decision might well have more effect in reforming the property tax assessment procedure than have several generations of learned studies and learned recommendations.

It is less clear what effect a change to statewide assessment might have on administrative costs of the property tax – estimated in a Montana study to be about 2.8 percent of collections.[22] state assumption of the assessment function, if it eliminated local assessors entirely, conceivably could realize economies of scale and save money. On the other hand, there would likely be strong pressures to retain the local assessor. Adding a state sales/assessment ratio program in states that do not now have such a program clearly would cost money (even though the gain in equity might make it money well spent). To retain the local assessor for the remaining local taxes but change to state assessment for state taxes would be both costly and confusing.

Maxwell suggests that "With respect to costs of administration, probably the income tax has a modest advantage over the sales tax – 1 percent to 1-1/2 percent of receipts as a cost, compared to 1-1/2 percent to 2 percent."[23] Compliance costs of the income tax are harder to estimate, but must be significantly greater than those of the property tax. The increasing trend toward basing state income taxes on Federal adjusted gross income (with minor adjustments) or even on Federal tax liability, however, must be sharply reducing the marginal cost of compliance with state income taxes. Evidence seems to be scanty, but one might speculate that this development may have pushed compliance costs for the income tax below those of the sales tax.

Revenue Adequacy

In 1970-71, property taxes produced $38 billion for state and local governments; general sales taxes produced $18 billion, and income taxes (individual and corporate) produced $15 billion. Clearly, these taxes cannot be faulted for lack of revenue productivity.

But there is more to the story. These taxes differ widely in their income elasticities. Estimates of the income elasticity of state personal income taxes, for the U.S. as a whole, range close to 1.75 – a 1 percent increase in income will add about 1.75 percent to state personal income tax collection.[24] The income elasticity of the corporate income tax apparently is lower, but probably averages slightly greater than one. General sales taxes seem to have approximately unitary elasticity. Estimates of the income elasticity of general property taxes in the U.S. range from 1.3 to 0.8, and there are estimates for individual cities and states that range from 1.41 to 0.34. The elasticity of this tax may be close to that of the general sales tax, although the median estimate would be slightly less than 1.

A more difficult question is to know how to interpret these data. A highly elastic tax is a two-edged sword. On the one hand, it will help to insure that revenues keep up with needs as the economy of a state expands and incomes rise. On the other hand, states desire revenue stability during a recession – deficit financing to maintain economic stability is easier for the Federal government than it is for the states – and a highly elastic tax will not be a stable one.

There is not space in this paper to discuss alternative formulas for distributing the increased state aid. One issue, however, should be brought to the surface because it materially affects revenue systems: the extent to which local residents will be permitted to decide the amount to be spent on their schools. Some advocate complete state dictation of the amount to be spent. Districts would be classified by the state according to educational needs, and would not be permitted to spend more (or less) than the state mandate. Others advocate a state-financed or mandated minimum (perhaps made up mostly of

[21] For an introduction, see Goode, Richard, *The Individual Income Tax,* Washington, Brookings Inst., 1964.

[22] Wicks, John H. and Michael N. Killworth, "Administrative and Compliance Costs of State and Local Taxes," *National Tax Journal,* Sept. 1967, p. 309.

[23] Maxwell, James A., *Financing State and Local Governments,* revised edition, Washington, Brookings, 1969, p. 102.

[24] Elasticity estimates used in this paragraph are all from ACIR *State-Local Finances,* op. cit., p. 301.

local funds in rich districts and mostly of state aid in poor districts), with districts permitted to spend more if they want to. Finally, ingenious state aid programs have been worked out which would make each mill of property tax levy produce the same amount of revenues in any district in the state, and, having equalized financial power, would then leave it up to residents of each district to decide for themselves how much of their incomes they wanted to devote to educating their children.[25] The issue, here, seems to be between equality and freedom of individual choice. It cannot be resolved on economic grounds.

To summarize: Advocates of change in the way we finance our schools raise important problems and difficult issues. The changes they urge probably would force us to shift much more of this finance to the state level. The choice among ways to raise that revenue, though, is not a clear one, and the issues to be faced in distributing it are considerable. Many public finance specialists suggest greater state use of the personal income tax, and this tax has definite advantages. However, the particular type of tax which might best be used to raise money for education in each state will vary with the state, and many states will want to use a combination.

[25] Brazer, Harvey E., "The Case for Local Control and Financing of Elementary and Secondary Education," *Proceedings of the Sixty-Fourth Annual Conference on Taxation, National Tax Association, 1971,* (Columbus, Ohio, 1972) p. 763.

Table 1. STATE AND LOCAL EXPENDITURES ON EDUCATION, AND ESTIMATED COSTS OF RAISING EXPENDITURES TO VARIOUS LEVELS, U.S., 1969-70

State	Number of school districts	Total expenditure	Comparative levels of expenditure per pupil in State and cost of raising all districts to that level							
			95th percentile		90th percentile		70th percentile		50th percentile	
			Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost
	No.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.
Massachusetts	360	853.2	1,073	344.6	963	236.0	774	68.4	732	42.4
Michigan	527	1,565.0	965	473.1	888	326.6	767	125.5	734	87.3
Minnesota	475	649.7	777	107.2	777	107.2	712	57.4	650	22.5
Mississippi	148	240.5	576	56.5	541	40.6	491	21.5	453	10.8
Missouri	644	619.3	853	143.0	808	107.1	734	61.6	667	28.7
Montana	700	162.1	1,807	127.0	1,358	62.5	1,016	19.6	900	9.5
Nebraska	1,410	210.2	893	79.0	786	48.3	644	11.5	621	7.7
Nevada	17	97.9	1,004	15.7	929	8.1	857	1.3	838	0.0
New Hampshire	159	91.9	764	20.3	739	16.9	655	7.5	594	2.3
New Jersey	580	1,179.7	1,076	372.2	1,009	285.6	851	106.5	772	42.4
New Mexico	89	151.5	677	33.1	645	25.3	549	5.2	520	0.9
New York	721	3,458.2	1,350	998.9	1,193	537.7	1,097	275.8	1,077	244.5
North Carolina	152	649.7	675	84.9	675	84.9	618	36.0	590	19.5
North Dakota	380	94.9	826	24.1	776	17.7	687	8.2	649	4.9
Ohio	638	1,605.1	909	530.8	881	471.8	728	182.7	648	79.5
Oklahoma	683	318.0	775	111.2	662	55.4	587	23.5	557	13.2
Oregon	355	363.4	953	70.4	914	54.6	811	17.7	798	13.8
Pennsylvania	581	2,032.9	1,102	456.8	1,102	456.8	938	180.3	845	62.7
Rhode Island	40	136.3	1,045	45.3	1,045	45.3	821	13.9	736	5.3
South Carolina	46	305.5	562	28.2	562	28.2	533	14.5	511	6.4

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			Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost
	No.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.
Alabama	120	325.7	488	50.5	473	40.2	436	17.5	407	5.4
Alaska	28	60.7	1,254	10.2	1,254	10.2	1,102	4.0	994	0.2
Arizona	297	303.1	1,022	99.0	991	88.1	840	42.8	713	13.2
Arkansas	378	168.4	546	49.0	512	37.1	445	15.5	407	7.3
California	1,078	3,552.4	1,075	1,382.2	918	731.2	776	216.4	747	141.7
Colorado	181	356.7	853	65.0	853	65.0	793	43.6	694	14.6
Connecticut	169	529.4	1,094	179.6	1,002	126.8	877	62.1	772	22.9
Delaware	23	92.3	1,081	32.3	1,081	32.3	802	5.7	741	1.6
Florida	67	955.9	883	185.1	824	117.2	787	83.5	722	35.8
Georgia	190	545.1	736	188.9	706	162.6	534	25.5	516	16.0
Hawaii	7	86.2	544	10.5	533	8.7	492	2.9	486	2.4
Idaho	115	120.4	1,057	56.9	904	33.6	763	14.4	664	5.1
Illinois	1,220	1,934.0	1,283	680.6	1,129	401.6	1,068	294.4	892	96.8
Indiana	313	686.4	779	161.9	729	112.9	681	71.3	619	33.0
Iowa	452	504.3	958	112.0	912	85.4	806	30.9	752	12.6
Kansas	311	327.2	871	101.7	798	69.6	664	16.9	646	11.8
Kentucky	193	314.3	668	109.6	576	57.1	521	31.9	462	9.8
Louisiana	66	509.7	749	66.4	730	53.6	669	17.6	655	11.3
Maine	268	135.4	660	23.1	660	23.1	589	10.3	551	5.2
Maryland	24	703.6	1,037	175.2	1,037	175.2	826	28.1	795	14.3

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			Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost	Expenditure per pupil	Additional cost
	No.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.	Dol.	Mil. dol.
South Dakota	658	105.2	823	30.8	750	20.1	637	5.7	607	2.6
Tennessee	149	428.0	629	88.9	629	88.9	577	54.0	491	14.9
Texas	1,185	1,352.6	729	394.7	668	263.4	577	92.5	540	40.9
Utah	40	169.1	710	33.5	630	13.1	601	7.0	568	1.4
Vermont	247	81.8	959	26.9	905	21.4	800	11.9	687	4.8
Virginia	136	640.3	787	140.3	776	130.8	691	68.8	606	21.7
Washington	322	659.8	981	107.2	981	107.2	894	55.9	831	28.0
West Virginia	55	228.9	708	31.4	706	30.8	640	12.3	601	4.9
Wisconsin	455	697.1	904	134.1	849	89.3	772	35.1	747	20.7
Wyoming	131	71.1	1,301	38.8	1,146	27.1	863	8.5	706	1.3
Total*	17,583	31,430.1	---	8,758.8	---	6,151.4	---	2,588.5	---	1,285.0

*Detail may not sum to totals because of rounding.

Source: Barr, Richard, et. al., "Review of Existing State School Finance Programs," Staff Report, President's Comm. on School Finance, 1971.