

# Challenges and Complexities in Local Tax Effort Contributions to Educational Spending in New York State

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## Executive Summary

School districts in New York State rely heavily on local revenue they raise from the assessment of property taxes. Because property wealth varies widely across districts, some districts can raise significant local revenue with relatively modest tax rates, while other districts with lower property wealth may struggle to raise comparable revenue even with higher tax rates.

This report examines two fundamental questions around this issue. For the state's 668 school districts outside of the Big 5 (New York's five most populous city school districts: New York City, Buffalo, Rochester, Syracuse, and Yonkers):

- Do districts with similar wealth make similar efforts to raise local revenue?
- Do those local tax efforts, and the allocation of equalizing state aid, result in similar per-pupil spending?

Findings include:

- The Foundation Aid formula—the state's primary method for financing school districts, which allocates more state funding to districts with greater need—has largely reduced disparities in per pupil revenue across 80 percent of districts. The wealthiest 20 percent of districts, however, still use their large property tax wealth bases to generate significantly higher levels of per-pupil revenue than less wealthy districts, even accounting for need-based state aid allocations.

- Several policy changes could augment the existing school financing system to address these disparities. Some reforms could involve incremental adjustments to the Foundation Aid Formula, such as shifting some of the state aid currently available to districts with exceptionally high capacity for generating local revenue to lower-wealth districts; modifying the amount of required minimum local revenue contribution districts must make before state aid is triggered; or scaling back current Save Harmless provisions that prevent even the wealthiest school districts from receiving less Foundation Aid in the current year than it did in the prior year no matter how much their tax bases have grown.

Over a longer time horizon, more structural reforms could be considered as well that draw on approaches used in other states. These include recapturing and redistributing excess local revenue or even restructuring the boundaries of school districts.

## Introduction

Education scholars C. Kirabo Jackson and Claudia Perisco have noted that “[t]here is a growing literature on how various school inputs, such as class size, teacher quality, and high-quality professional development, improve educational outcomes. All of these cost money.”<sup>1</sup> The three primary financing sources for state K-12 education systems are federal allocations, appropriations, and local revenue sources. On average in the United States, states rely on federal revenue for almost 13 percent of their education funding, contribute about 42 percent themselves, and count on local revenue sources for the remaining 45 percent (see [Table 1](#)). This breakdown varies tremendously across states, however. For example, as reflected in [Table 1](#), while Hawaii and Vermont each rely on state sources for more than 85 percent of their total education revenue (88.0 percent and 85.7 percent, respectively), Nebraska, Missouri, and New Hampshire do so for less than 30 percent (29.5 percent, 28.6 percent, and 28.0 percent, respectively). Similar variations occur in states’ reliance on local revenue sources, ranging from a share of more than 60 percent to less than 3 percent. New York ranks eighth-highest in its reliance on local revenue sources to fund K-12 education, at 51.5 percent of total education revenue.

This report takes a deeper dive into the level of local revenue raised by New York’s school districts. As found in the Rockefeller Institute’s comprehensive 2024 report on the state’s Foundation Aid funding formula, “There is broad scholarly consensus that the Foundation Aid formula implemented in New York in 2007 created one of the most progressive systems of state education funding in the country. Researchers also note, however, that continuing inequities in per-pupil district spending and student outcomes result from...[among other things] variations in local funding contributions.”<sup>2</sup>

While the state’s “Big 5” school districts—New York City and the cities of Buffalo, Rochester, Syracuse, and Yonkers—serve just under 40 percent of all K-12 students,<sup>3</sup> these cities have significantly different local funding structures (including, for example, the levying of local income taxes in New York City and Yonkers), that prohibits a level comparison to most other districts. This analysis, therefore, excludes the Big 5 and focuses its examination on the state’s other 668 school districts.

**TABLE 1 | Local, State, and Federal Education Revenue by State, FY 2023 (in thousands of dollars)**

| State                 | Total Education Revenue | Local Revenue      |             | State Revenue      |             | Federal Revenue    |             |
|-----------------------|-------------------------|--------------------|-------------|--------------------|-------------|--------------------|-------------|
|                       |                         | (\$000s)           | (%)         | (\$000s)           | (%)         | (\$000s)           | (%)         |
| New Hampshire         | 3,842,002               | 2,434,600          | 63.4        | 1,076,420          | 28.0        | 330,982            | 8.6         |
| Nebraska              | 5,660,814               | 3,328,090          | 58.8        | 1,668,099          | 29.5        | 664,626            | 11.7        |
| Missouri              | 15,218,182              | 8,753,416          | 57.5        | 4,358,597          | 28.6        | 2,106,168          | 13.8        |
| Connecticut           | 13,810,681              | 7,678,952          | 55.6        | 4,989,316          | 36.1        | 1,142,414          | 8.3         |
| Illinois              | 45,725,327              | 25,114,403         | 54.9        | 15,813,151         | 34.6        | 4,797,773          | 10.5        |
| Pennsylvania          | 40,439,337              | 20,915,445         | 51.7        | 14,853,546         | 36.7        | 4,670,346          | 11.5        |
| Texas                 | 85,346,213              | 44,072,232         | 51.6        | 26,638,372         | 31.2        | 14,635,609         | 17.1        |
| <b>New York</b>       | <b>85,560,758</b>       | <b>44,046,668</b>  | <b>51.5</b> | <b>33,022,644</b>  | <b>38.6</b> | <b>8,491,447</b>   | <b>9.9</b>  |
| Colorado              | 15,694,847              | 8,006,569          | 51.0        | 6,284,938          | 40.0        | 1,403,340          | 8.9         |
| Ohio                  | 31,527,075              | 15,905,919         | 50.5        | 11,171,971         | 35.4        | 4,449,185          | 14.1        |
| Massachusetts         | 23,067,045              | 11,613,820         | 50.3        | 9,590,498          | 41.6        | 1,862,728          | 8.1         |
| Maine                 | 3,679,498               | 1,797,503          | 48.9        | 1,535,175          | 41.7        | 346,820            | 9.4         |
| Florida               | 43,465,384              | 21,092,252         | 48.5        | 15,247,618         | 35.1        | 7,125,514          | 16.4        |
| South Dakota          | 2,172,071               | 1,051,550          | 48.4        | 670,994            | 30.9        | 449,527            | 20.7        |
| Virginia              | 22,838,044              | 10,891,851         | 47.7        | 9,311,709          | 40.8        | 2,634,483          | 11.5        |
| Maryland              | 19,968,464              | 9,413,501          | 47.1        | 8,465,907          | 42.4        | 2,089,056          | 10.5        |
| Georgia               | 29,751,696              | 13,967,389         | 46.9        | 11,796,440         | 39.6        | 3,987,867          | 13.4        |
| New Jersey            | 41,513,366              | 19,016,680         | 45.8        | 19,298,714         | 46.5        | 3,197,971          | 7.7         |
| Louisiana             | 12,415,332              | 5,507,309          | 44.4        | 4,327,412          | 34.9        | 2,580,611          | 20.8        |
| Wyoming               | 2,038,535               | 892,726            | 43.8        | 854,990            | 41.9        | 290,819            | 14.3        |
| Rhode Island          | 3,436,595               | 1,469,646          | 42.8        | 1,462,925          | 42.6        | 504,023            | 14.7        |
| Wisconsin             | 15,039,787              | 6,302,525          | 41.9        | 6,763,440          | 45.0        | 1,973,823          | 13.1        |
| Tennessee             | 14,367,607              | 5,896,717          | 41.0        | 5,818,328          | 40.5        | 2,652,563          | 18.5        |
| Montana               | 2,422,900               | 985,966            | 40.7        | 984,926            | 40.7        | 452,008            | 18.7        |
| South Carolina        | 14,488,608              | 5,806,809          | 40.1        | 6,650,848          | 45.9        | 2,030,951          | 14.0        |
| Oklahoma              | 9,150,054               | 3,618,706          | 39.5        | 3,989,129          | 43.6        | 1,542,220          | 16.9        |
| Utah                  | 8,797,637               | 3,446,422          | 39.2        | 4,514,089          | 51.3        | 837,127            | 9.5         |
| Iowa                  | 8,652,935               | 3,341,308          | 38.6        | 4,343,237          | 50.2        | 968,390            | 11.2        |
| Arkansas              | 6,919,881               | 2,602,735          | 37.6        | 2,913,370          | 42.1        | 1,403,776          | 20.3        |
| Oregon                | 11,619,650              | 4,321,255          | 37.2        | 6,154,789          | 53.0        | 1,143,605          | 9.8         |
| North Dakota          | 2,329,303               | 828,138            | 35.6        | 1,085,139          | 46.6        | 416,026            | 17.9        |
| West Virginia         | 4,305,978               | 1,444,791          | 33.6        | 2,024,144          | 47.0        | 837,043            | 19.4        |
| Kentucky              | 11,667,611              | 3,815,657          | 32.7        | 5,830,644          | 50.0        | 2,021,311          | 17.3        |
| Mississippi           | 6,377,007               | 2,010,442          | 31.5        | 2,873,880          | 45.1        | 1,492,684          | 23.4        |
| Alabama               | 11,602,540              | 3,613,333          | 31.1        | 5,957,143          | 51.3        | 2,032,064          | 17.5        |
| Arizona               | 15,901,117              | 4,815,759          | 30.3        | 8,202,181          | 51.6        | 2,883,176          | 18.1        |
| Indiana               | 16,740,829              | 5,054,902          | 30.2        | 9,451,704          | 56.5        | 2,234,223          | 13.3        |
| California            | 144,367,482             | 43,173,349         | 29.9        | 84,859,978         | 58.8        | 16,334,155         | 11.3        |
| Michigan              | 28,912,666              | 8,429,191          | 29.2        | 16,388,193         | 56.7        | 4,095,282          | 14.2        |
| Minnesota             | 16,784,871              | 4,888,274          | 29.1        | 10,196,305         | 60.7        | 1,700,292          | 10.1        |
| Delaware              | 3,048,416               | 878,587            | 28.8        | 1,790,040          | 58.7        | 379,789            | 12.5        |
| Kansas                | 8,161,979               | 2,182,619          | 26.7        | 5,260,559          | 64.5        | 718,801            | 8.8         |
| Washington            | 23,128,326              | 5,869,318          | 25.4        | 14,922,091         | 64.5        | 2,336,916          | 10.1        |
| North Carolina        | 20,350,007              | 5,048,072          | 24.8        | 11,570,490         | 56.9        | 3,731,444          | 18.3        |
| Alaska                | 2,845,504               | 644,105            | 22.6        | 1,577,276          | 55.4        | 624,123            | 21.9        |
| Idaho                 | 3,816,271               | 824,833            | 21.6        | 2,412,159          | 63.2        | 579,278            | 15.2        |
| New Mexico            | 6,161,591               | 1,126,000          | 18.3        | 3,921,393          | 63.6        | 1,114,198          | 18.1        |
| Nevada                | 6,773,830               | 1,138,005          | 16.8        | 4,652,740          | 68.7        | 983,085            | 14.5        |
| Vermont               | 2,219,347               | 62,457             | 2.8         | 1,902,719          | 85.7        | 254,170            | 11.5        |
| Hawaii                | 4,337,804               | 55,436             | 1.3         | 3,817,300          | 88.0        | 465,067            | 10.7        |
| <b>50-State Total</b> | <b>978,462,804</b>      | <b>409,196,232</b> | <b>41.8</b> | <b>443,267,670</b> | <b>45.3</b> | <b>125,998,899</b> | <b>12.9</b> |

SOURCE: Adapted from Stephen Q. Cornman, et al., *Revenues and Expenditures for Public Elementary and Secondary Education: School Year 2022–23 (Fiscal Year 2023): First Look*, (NCES 2025-302) (Washington, DC: National Center for Education Statistics, US Department of Education, 2025), <http://nces.ed.gov/pubsearch>.

School districts in New York State rely on local property taxes as a major source of stable funding. This structure provides a measure of local control, with voters in each district having a say in the amount of spending for each public school student, the approval of school budgets, and the size of tax levies to support it all. A particular challenge in New York State, though, is that the value of taxable property varies greatly among individual school districts throughout the state. Data from the Office of the State Comptroller shows that the top 20 percent of districts (excluding the ‘Big 5’ city school districts, which have unique state education aid funding streams) account for 59.5 percent of the taxable property wealth among all districts ([Figure 1](#)).<sup>4</sup> The taxable value in this group of school districts totals \$1.1 trillion. In contrast, the bottom 20 percent of districts comprise just 2.5 percent of total local property wealth, with taxable property values totaling less than \$46.8 billion. For example, property values in the Southampton Union Free School District on eastern Long Island total around \$47.6 billion, or \$39.0 million per pupil; meanwhile, in Friendship, a rural district in Upstate’s Allegany County, the total taxable property value is \$111.1 million, or just over \$460,000 per pupil, less than 1.2 percent of that of Southampton (see [Appendix A](#) for a list of districts by property wealth).<sup>5</sup>

This unequal distribution in property values has direct and significant implications on the local tax effort needed by districts to generate revenue and on the resulting resources available for education spending. Property-wealthy districts can establish relatively low tax rates while still generating substantial revenue, whereas property-poor districts must often impose much higher rates to raise comparable funds.

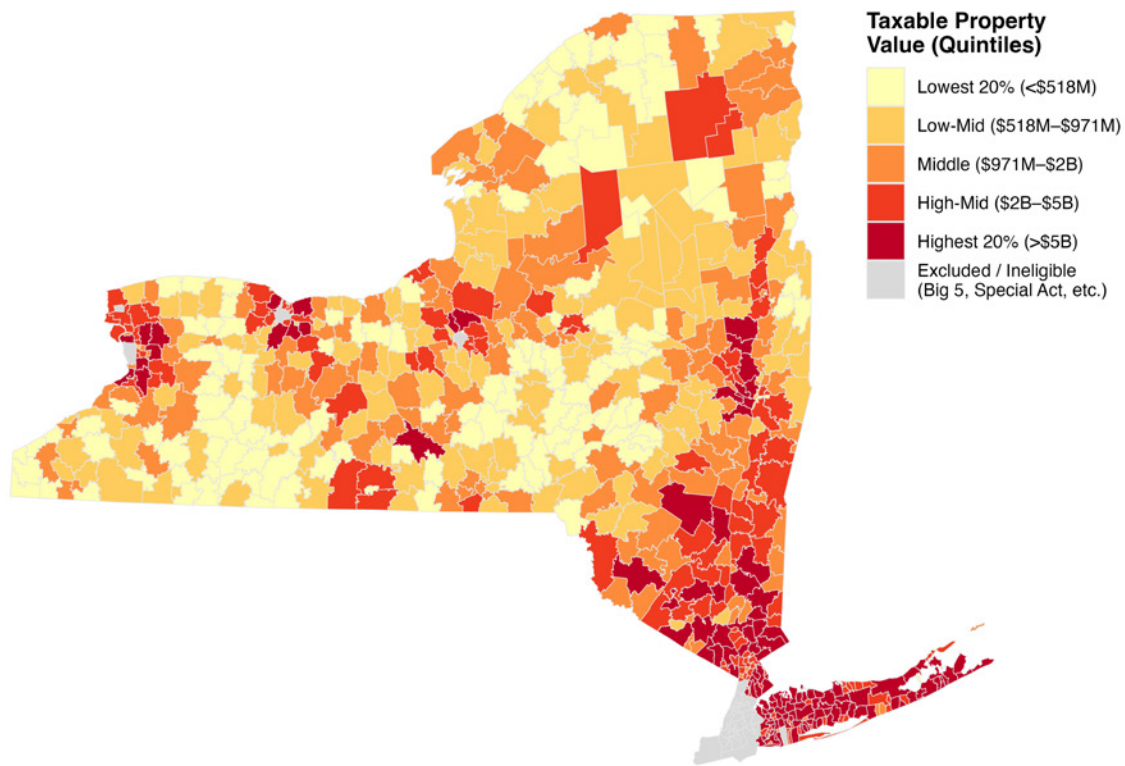
Due to this property-wealth disparity across districts, many states, including New York, use state revenue to provide additional funding to lower property-wealth districts. New York’s allocation of state education aid is done primarily through its Foundation Aid formula, a complex yet progressive distribution schedule that is designed to account for property-wealth inequality by giving additional funding to those districts with fewer resources and greater needs. But is this state allocation enough to offset disparities in local revenue?

This report examines two fundamental questions around this issue:

- Do districts with similar wealth make similar efforts to raise local revenue?
- Do those local tax efforts, and the allocation of equalizing state aid, result in similar per-pupil spending?

Based on the findings, we discuss potential ways to make funding more equitable in New York State, ranging from incremental changes to the Foundation Aid formula to more comprehensive solutions, such as redistribution of local tax revenue and redesign of school district boundaries, which draw on insights from approaches taken in other states.

**FIGURE 1** | Distribution of School District Property Wealth in New York State by Quintile, CY 2025



*SOURCE:* “Real Property Tax Levies, Taxable Full Value and Full Value Tax Rates,” Office of the New York State Comptroller, 2025, <https://www.osc.ny.gov/local-government/data/real-property-tax-levies-taxable-full-value-and-full-value-tax-rates>. Figures represent the Taxable Full Value, which estimates the total market value of taxable real property by applying state equalization rates to local assessments. The analysis excludes the “Big 5” fiscally dependent city school districts (New York City, Buffalo, Rochester, Syracuse, and Yonkers) and Special Act districts because their fiscal structures differ.

## What Is the Role of Local Funding in New York State?

Nationally, on average, school districts derive about 42 percent of their revenue from local sources, primarily property taxes.<sup>6</sup> New York State is a high local-share state. Its school districts obtain the largest share of their funding—about 52 percent—from local revenue, followed by state aid at 39 percent and federal aid at 10 percent. The reliance on local revenue in New York is driven by deference to the concept of greater local autonomy (“home rule”) and fiscal independence of local municipalities. New York Real Property Tax Law grants school districts the authority to levy taxes on property owners to cover educational costs, subject to approval by voters and certain constraints.<sup>7</sup> These constraints include New York’s property tax cap, which limits a district’s annual levy increase to the lesser of the increase in inflation or 2 percent, plus or minus exemptions and exclusions that vary by district, unless a supermajority of 60 percent of local voters approve exceeding the cap.<sup>8</sup> Outside of the property tax cap and a few other restrictions, local school districts are free to spend whatever level is approved by local voters.

The state calculates its obligation for local education aid by assuming a minimum local contribution from each district, with the intent that the wealthier a school district is, the less state aid it is entitled to. This local share is deducted from what the Foundation Aid formula determines is the district's total cost of education to determine the state's obligation for the remaining portion. Districts may calculate their required local share using whichever of the two prescribed methods is more favorable: the Expected Minimum Local Contribution (EMLC) or the Foundation Aid State Sharing Ratio (FASSR). The FASSR, which is most commonly used, separates districts into tiers by wealth; districts in higher (wealthier) tiers are expected to contribute more local revenue. (See [Appendix B](#) for a more detailed description of the EMLC and the FASSR.)

Legal challenges to how New York State funds education began in the 1970s, joining others in states across the country challenging state funding approaches on "adequacy" and "equity" grounds. Largely driven by the highest state court's decision in *Levittown UFSD v. Nyquist* in 1982, deference to local spending preferences was preserved and remains in place as policy to this day. While the court did not deny that inequalities existed, it determined that disparities were "educational unevenness above [a required] minimum standard,"<sup>9</sup> and thus not in violation of the requirement for the state to simply ensure the provision of a "sound, basic education" statewide. Local districts could supplement spending as much as they wished, and local residents allowed.

The state provides districts with a base amount of funding per pupil (\$8,273 for SY 2025-26) under the Foundation Aid formula.<sup>10</sup> This formula then adjusts the base amount through a series of progressive adjustments that consider the characteristics of the district, including the Pupil Needs Index. This index considers several factors, including the number of English Language Learners, students eligible for free or reduced-price lunch, and students in poverty as estimated by the Small Area Income and Poverty Estimates program.<sup>11</sup> Each of these categories receives a multiplier that increases funding above the base amount. In total, districts receive about 36 percent of their funding from Foundation Aid and other sources of state aid. Federal funding provides the remaining 7 percent and is generally targeted for specific purposes, such as supporting students with disabilities and federally designated Title I schools, which are public schools that receive federal funding under the Elementary and Secondary Education Act because at least 40 percent of their students come from low-income families.<sup>12</sup>

## Relationship Between Local Effort Rate and Per-Pupil Revenue

The New York State Education Department tracks the Local Revenue Effort Rate for each district to capture the intensity with which districts impose taxes relative to their property wealth.<sup>13</sup> To examine the relationship between tax effort and revenue capacity, here we analyze variation in the Local Revenue Effort Rate across school districts grouped into 10 equal-sized groups, or deciles, based on their Combined Wealth Ratio (CWR). The CWR is a calculation devised to measure school districts’ “ability to pay,” incorporating both property wealth and local income levels.

The results in [Table 2](#) display the expected relationship of local tax effort and revenue between the poorest 10 percent of districts (Decile 1) and the wealthiest 10 percent (Decile 10). Districts in Decile 1 exert an average Local Revenue Effort Rate of 19.9, yet this high effort raises only \$6,970 per pupil on average. The trend of relatively high effort yielding relatively low returns persists into the middle deciles. Districts in Decile 5 employ a nearly identical effort rate of 19.0, generating \$14,265 per pupil. By comparison, the districts in Decile 10 operate with an effort rate of only 10.2, yet they raise \$46,241 per pupil on average, more than 6.6 times greater than that raised by the lowest-wealth districts.

**TABLE 2 | Local Tax Effort, Revenue, and Spending by District Wealth (SY 2023–24)**

| Wealth Decile | Districts (n) | Average Combined Wealth Ratio | Average Local Revenue Effort Rate | Average Local Revenue Per Pupil | Average Total Revenue Per Pupil |
|---------------|---------------|-------------------------------|-----------------------------------|---------------------------------|---------------------------------|
| 1             | 67            | 0.360                         | 19.895                            | \$6,970                         | \$33,848                        |
| 2             | 67            | 0.456                         | 17.749                            | \$8,228                         | \$33,458                        |
| 3             | 67            | 0.521                         | 19.334                            | \$10,427                        | \$32,971                        |
| 4             | 67            | 0.580                         | 18.474                            | \$11,278                        | \$31,767                        |
| 5             | 67            | 0.667                         | 19.001                            | \$14,265                        | \$32,603                        |
| 6             | 67            | 0.771                         | 17.515                            | \$16,197                        | \$31,817                        |
| 7             | 67            | 0.896                         | 17.370                            | \$18,153                        | \$33,210                        |
| 8             | 67            | 1.099                         | 16.563                            | \$22,428                        | \$35,232                        |
| 9             | 66            | 1.543                         | 15.630                            | \$28,694                        | \$39,014                        |
| 10            | 66            | 6.059                         | 10.156                            | \$46,241                        | \$54,464                        |

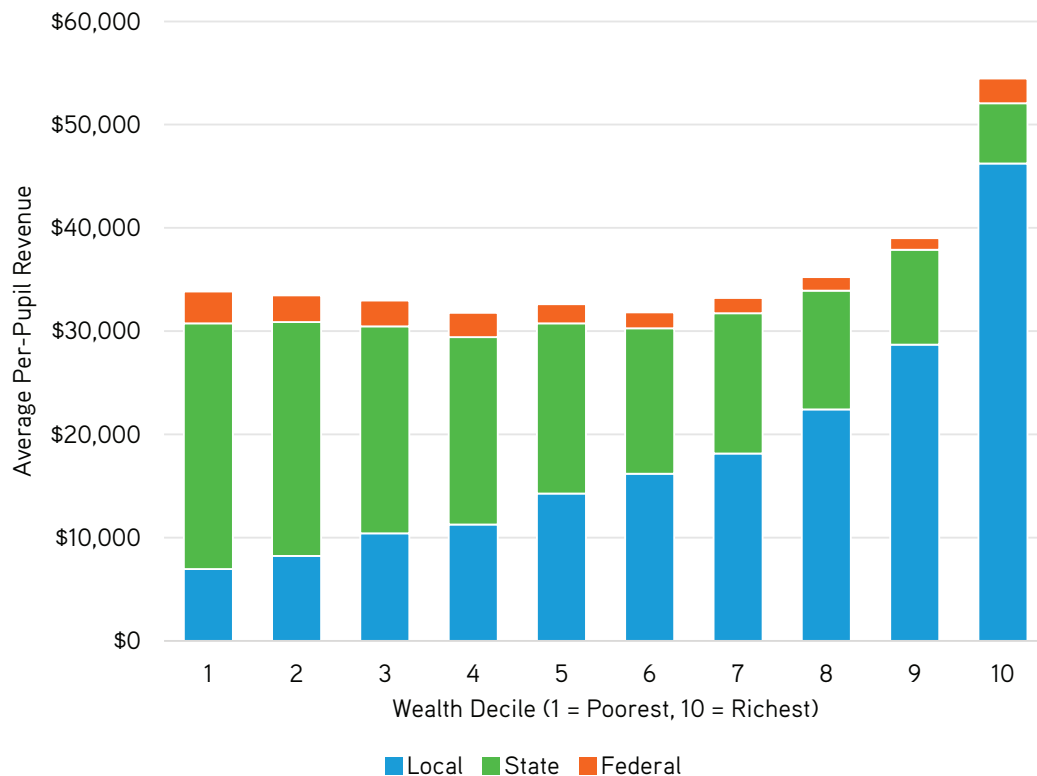
*NOTES:* Per-pupil figures calculated using Duplicated Combined Adjusted Average Daily Membership (DCAADM). Combined Wealth Ratio is a measure of district fiscal capacity based on property values and resident income relative to the state average (1.0 = state average). Excludes Big 5 city school districts (New York City, Buffalo, Rochester, Syracuse, Yonkers). The effort rate for residents of a central high and a component district would be higher than is displayed in this table, since local revenue was raised by both the component and central high districts.

*SOURCE:* Rockefeller Institute analysis of data in the 37th edition of the Fiscal Profiles data file produced by the New York State Education Department, <https://www.nysed.gov/fiscal-analysis-research/school-district-fiscal-profiles>.

State and federal aid substantially narrows these disparities for most districts. For Deciles 1 through 8, the Foundation Aid formula seems to work relatively well at bridging the gaps in local revenue for most districts: the average total per-pupil spending falls within a relatively tight range of approximately \$32,000 to \$35,000 across 80 percent of school districts. Disparities in total per pupil revenue become quite visible at the upper end of the wealth distribution, with a modest 10.7 percent jump in total revenue from Decile 8 (\$35,232) to Decile 9 (\$39,014), and then a substantial jump from Decile 9 to Decile 10 (\$54,464) of 39.6 percent.

Districts in the top decile have an advantage in their ability to generate local revenue, owing to their high property values that far outpace the state aid formula’s efforts to offset the difference, as it largely does in the other school districts. In other words, the funding-versus-spending gap in New York is concentrated among the wealthiest 10 to 20 percent of school districts rather than spread evenly across the state. This pattern is shown in Figure 2, which breaks total per-pupil revenue into its three primary sources across the deciles.

**FIGURE 2 | Local Revenue Per Pupil by Source and Wealth Decile, SY 2023–24**



*SOURCE:* Rockefeller Institute analysis of data in the 37th edition of the Fiscal Profiles data file produced by the New York State Education Department, <https://www.nysed.gov/fiscal-analysis-research/school-district-fiscal-profiles>. Figures represent the Taxable Full Value, which estimates the total market value of taxable real property by applying state equalization rates to local assessments. The analysis excludes the “Big 5” fiscally dependent city school districts (New York City, Buffalo, Rochester, Syracuse, and Yonkers) and Special Act districts because their fiscal structures differ.

## Potential Influences on the Analytic Approach

A concern with this type of analysis is the influence of outliers. The 668 districts are, of course, very different in their financial capacity, size, and the type of students they serve. Indeed, such variation among districts is what drove this current analysis. Some districts may be so different that they unduly influence the findings, however, potentially obscuring patterns. Thus, we identified districts as outliers if their total amount of property taxes collected (the property tax levy) exceeded 10 percent of residents' aggregate adjusted gross income. We chose this threshold because it does a pretty good job of identifying a specific type of district: small vacation and resort communities, primarily in the Adirondacks and Catskills, for example, with high-priced homes owned by taxpayers who claim their typically higher incomes in their different districts of residence. We found that excluding these districts had only minimal and insignificant shifts in the key metrics across deciles and did not substantively affect any of the findings; therefore, we chose to keep all school districts (still excluding the "Big 5") in this analysis.

Also worth noting is that there are various ways to measure the wealth of school districts beyond CWR, each offering a different lens on the local economic picture. Property wealth per pupil, for example, captures the taxable base available to support each student. Property tax levy as a share of residents' adjusted gross income offers a sense of how burdensome school taxes are relative to what residents earn. We examined all school districts according to these metrics, too, and yet when districts are grouped by these alternative measures, we found that the patterns still are broadly consistent with the CWR-based analysis in [Table 2](#). Thus, we use CWR throughout because it is the measure embedded in the Foundation Aid formula, and it is the most relevant measure for evaluating how well state policy aligns resources with need.

## Insights from Other States

A report published in 1998 by the Government Accountability Office found that states often struggle to equalize revenue across school districts because districts typically rely significantly on funds raised through property taxes, and leave the determination of how heavily that share should be to local determination.<sup>14</sup> Since the publication of that report several decades ago, states have taken various strategies to address this issue. Perhaps the most drastic approach has been in Vermont. In 1997, the Supreme Court of Vermont considered the case of *Brigham v. State*.<sup>15</sup> The plaintiffs, represented by the American Civil Liberties Union of Vermont, argued that the large variation in property values among school districts across the state created an inequitable system for raising revenues for school districts. Some districts, such as those with ski resorts (referred to colloquially as "Gold Towns"), have high property values and can raise substantial revenues with low tax rates. Meanwhile, more blue-collar districts with low property values must tax their residents more heavily yet still raise far less revenue. The plaintiffs' concern was that state and federal aid were insufficient to make up the difference in revenue for property-poor districts, potentially leading to fewer resources (and lower educational outcomes) for their students. The landscape

noted here in Vermont seems quite similar to the disparities among school districts in New York (when the Big 5 districts are excluded).

The Vermont Supreme Court ruled in favor of the plaintiffs, and the state legislature passed The Equal Educational Opportunity Act in response.<sup>16</sup> This Act essentially established a statewide property tax and pooled these funds for redistribution as state aid. As a result, the lion's share of districts' revenue—about 90 percent—is provided as state aid, with local and federal sources making up the remainder.

While Vermont pools property taxes for distribution, other states looking to equalize local property tax effort among school districts take a different approach: capturing a district's excess local revenue and redistributing it to districts with greater need. For example, the Education Code in Texas includes a recapture provision,<sup>17</sup> often referred to as "Robin Hood," that limits the amount of revenue that a property-wealthy district can keep. The Texas State Education Agency determines a district's wealth per student, and if this measure exceeds a threshold called the "equalized wealth level," the district must remit the excess funds to the state. The state redistributes the recaptured funds to property-poor districts that struggle to raise local revenue on their own.

Wyoming, which sees disparities in local revenue generation because mineral wealth is unequally distributed across the state, uses a similar strategy.<sup>18</sup> Here, all districts receive a guaranteed block grant of education aid, to be comprised of local revenue, state funding, or a combination of both. If a district generates local revenue that exceeds the grant amount, it must rebate the excess to the state. These recaptured dollars flow into the statewide School Foundation Program fund and are redistributed.

Some of the property values in high property-wealth districts could be driven by demand for what are perceived to be good public schools in those districts. If tax revenue redistribution programs and policies such as those in Vermont, Texas, and Wyoming lead to less school spending in the high property-wealth districts, public perception about the quality of these schools could change, potentially leading to lower property values. This is but one of the many outcome effects policymakers in New York may wish to consider if deliberating about such a significant change in the construction of the state's school funding.

Another of these more radically different approaches is the partial substitution of local property taxes for school funding with other state-level sources of revenue. In 1994, legislation was passed in Michigan that reduced local property taxes and replaced the lost revenue by increasing the state sales tax (to 6 percent) and reallocating the revenue to school districts.<sup>19</sup> Property taxes were not eliminated entirely, but the shift toward sales-tax financing was intended to narrow the spending gap between the state's wealthiest and poorest school districts through a progressive approach to the redistribution of this revenue. Reception of the legislation in the years since has been mixed. While critics have argued that it has curtailed local control of finances, there is some evidence to indicate that it has equalized per-pupil revenue between property-wealthy and property-poor districts.<sup>20</sup>

Indiana is another example of the substitution approach.<sup>21</sup> The state uses sales and income tax revenues to support an Education Fund that pays for teacher salaries and

instructional costs, while local property taxes primarily support an Operations Fund that covers noninstructional expenses. This division is not absolute. Districts may still pass local operating referenda to levy additional property taxes for teacher salaries. Even so, the state-funded Education Fund substantially reduces districts' reliance on local property taxes for core educational expenditures.

The issue of equalization is also addressed in some states by the nature of how they structure their school districts.<sup>22</sup> Hawaii is unique among all states in having a single, statewide school district. Other states, particularly in the southeast region of the country, have counties serve as their school districts. These counties tend to be relatively large, encompassing a great diversity of geographic, demographic, and socioeconomic conditions, and thus individual communities across the spectrum of both income and property wealth. This heterogeneous makeup typically means that when property taxes are collected on a countywide basis, school aid tends to be redistributed countywide in a progressive way. In North Carolina, for example, one of the largest school districts in the state is Wake County.<sup>23</sup> It includes both the affluent suburbs of Cary and the urban center of Raleigh, resulting in a tax base that spans a wide range of property values. While this structure has been criticized for creating a lack of local autonomy and generating logistical challenges arising from managing such a large area, it has also seen benefits of resource sharing, efficiencies from centralized services, and a greater equalization of school spending.<sup>24</sup>

Revenue redistribution to help equalize spending among local school districts doesn't need to happen only at the state level, either. Counties could pursue similar redistributive revenue programs for the school districts that lie within their boundaries on their own, using a portion of county-assessed tax revenue as local education aid that provides a greater share to districts with less property wealth.

## Policy Considerations

If policymakers want to increase educational equity by distributing more funding to greater-need districts, they could consider several approaches to achieve this reform, some of which build on recommendations first outlined in the Rockefeller Institute's earlier comprehensive analysis of New York's Foundation Aid education funding formula.<sup>25</sup> Of course, as part of the consideration of any reform of this type, the effect on the Big 5 school districts and the 40 percent of the state's public school children these city school districts serve, districts excluded in this analysis, should be measured and considered.

One policy reform option is to make changes to the way the state's Foundation Aid formula currently determines the minimum local contribution required by school districts. Others are more incremental, such as eliminating the option for wealthy districts to take a guaranteed \$500 per-pupil grant instead of the smaller amount they would otherwise receive under the formula, or limiting access to Save Harmless funding for the wealthiest districts and reallocating those funds to lower-wealth districts through the formula.

More far-reaching reforms could involve reorganizing and reforming school districts themselves, such as making them coterminous with county boundaries, as do many states in the Southeastern US, or limiting the ability of wealthier local districts to retain all the property tax revenue they generate, such as through the recapture mechanisms used in Texas and Wyoming. These types of changes would require substantial statutory reforms, of course, and should include much more research, significant input from stakeholders, and opportunities for public discussion that are beyond the scope of what is offered in this report.

## Modification to Methods for Calculating Local Contribution

As discussed above, New York's Foundation Aid formula allows school districts to choose between two methods for calculating their minimum local contribution: the Foundation Aid State Sharing Ratio (FASSR) and the Expected Minimum Local Contribution (EMLC). Districts naturally select the option that estimates the smallest local contribution.

The EMLC uses an Income Wealth Index (IWI) to capture a district's property wealth and resident income relative to the state average. Districts with higher values on the IWI have a higher local contribution. An IWI of 1.0 equals the statewide average income per pupil; an IWI of 2.0 indicates twice the state average. The EMLC, however, applies a floor of 0.65 to the IWI, which overstates the fiscal capacity of the least wealthy districts. It also applies a ceiling of 2.0 that obscures variation among the wealthiest districts. As a result, the state's wealthiest districts are not asked to contribute in proportion to their actual capacity. If policymakers wanted to better align contributions with fiscal capacity, they could consider eliminating the 0.65 floor while raising the ceiling from 2.0 to 3.0.

The FAASSR also has structural limitations. It assigns districts to one of four tiers based on their combined wealth ratio. These tiers create funding discontinuities. Districts near a cutoff can experience abrupt changes in their required local contribution if they move from one tier to another. If policymakers wanted to eliminate these discontinuities, they could consider a single straight line or, for a more progressive approach, a curve formula. This single-formula approach would provide equity and predictability by applying the same underlying rule to all districts. For example, a continuous formula could start at the current maximum state share of 93 percent for districts with a CWR of zero and then decline smoothly to zero aid for the wealthiest districts. The specific shape of the decline, whether linear or curved, could be designed by policymakers to create a progressive phase-out in which higher-wealth districts receive a lower state share ratio. Additionally, state policymakers could decide to start such a single formula-driven curve only after providing the maximum State Sharing Ratio to a selected proportion of the lowest-wealth districts, as is done now for all districts at or below 0.5 Foundation Aid Combined Wealth Ratio (FACWR).

## Eliminating Inefficiencies that Benefit Wealthy Districts

If the state wished to reduce aid flowing to districts with high fiscal capacity, it could consider eliminating the current option to take a \$500 flat grant per pupil instead of a lower amount generated by the progressive Foundation Aid formula. The Rockefeller Institute found that in school year 2023–24, 45 districts accepted flat grants, totaling approximately \$41 million.<sup>26</sup> Those districts included 28 of the top 30 wealthiest districts in the state. In other words, state resources via these grants flow to districts with the highest ability to pay. Eliminating this option could allow the state to redistribute these funds through the formula to needier districts.

Changes like this to the Foundation Aid formula should be considered not as cost-saving measures, however, but as how they are portrayed in this analysis: options to increase the progressive redistribution of state education aid. Indeed, such reforms would yield limited cost savings because wealthy districts already receive very little Foundation Aid. As shown in [Table 3](#), districts in the lowest-wealth decile receive 19.5 percent of all Foundation Aid, while those in the top decile receive only around one percent. There is simply not much left to cut.

A more consequential reform in terms of dollars is Save Harmless. This practice guarantees that a school district’s Foundation Aid allocation will not decrease from the prior year, even if enrollment drops significantly, or components of the Pupil Needs Index change, or even if the expected minimum local contribution increases. Rural, property-poor districts have often benefited from this protection when faced with declining student populations. At the same time, however, Save Harmless subsidizes wealthy districts experiencing a drop in students or a drop in their wealth-based need calculation, even when those districts may have adequate revenue to absorb the change.

**TABLE 3** | Distribution of Foundation Aid and Save Harmless Costs by District Wealth, SY 2023–24

| CWR Decile | Foundation Aid Total | % of All FA | State Aid Total  | % of All State Aid | Save Harmless Cost | % of All Save Harmless |
|------------|----------------------|-------------|------------------|--------------------|--------------------|------------------------|
| 1          | \$2,475,292,076      | 19.5%       | \$3,419,439,054  | 16.9%              | \$5,313,439        | 1.4%                   |
| 2          | \$1,584,013,292      | 12.5%       | \$2,237,616,546  | 11.0%              | \$18,543,223       | 5.0%                   |
| 3          | \$1,308,719,286      | 10.3%       | \$2,016,816,180  | 9.9%               | \$22,931,050       | 6.1%                   |
| 4          | \$1,324,597,195      | 10.4%       | \$2,067,627,403  | 10.2%              | \$19,300,094       | 5.2%                   |
| 5          | \$1,355,598,296      | 10.7%       | \$2,225,315,679  | 11.0%              | \$34,455,805       | 9.2%                   |
| 6          | \$1,487,473,017      | 11.7%       | \$2,388,176,620  | 11.8%              | \$25,960,160       | 6.9%                   |
| 7          | \$1,372,276,378      | 10.8%       | \$2,353,371,742  | 11.6%              | \$45,317,626       | 12.1%                  |
| 8          | \$1,087,420,433      | 8.6%        | \$1,970,287,186  | 9.7%               | \$68,225,818       | 18.2%                  |
| 9          | \$596,119,422        | 4.7%        | \$1,247,474,416  | 6.2%               | \$76,922,536       | 20.5%                  |
| 10         | \$100,967,323        | 0.8%        | \$354,084,993    | 1.7%               | \$57,453,510       | 15.3%                  |
| Total      | \$12,692,476,718     | 100.0%      | \$20,280,209,819 | 100.0%             | \$374,423,261      | 100.0%                 |

*SOURCE:* Rockefeller Institute analysis of the *State Fiscal Profiles*, 37th edition. Excludes Big 5 City Districts. District-level Foundation Aid and hold-harmless costs are from the New York State Division of the Budget. Higher deciles of the Combined Wealth Ratio (CWR) indicate greater district wealth. Save Harmless cost represents the difference between a district’s Foundation Aid allocation and the amount that would result from the formula alone, absent the hold-harmless provision.

[Table 3](#) shows that districts in the top decile account for 15.3 percent of all Save Harmless spending by the state, and the top three deciles together account for roughly 55 percent of total Save Harmless spending. These protections effectively channel state resources to districts with the greatest capacity to absorb state funding changes on their own.

Consistent with a previous recommendation from the Rockefeller Institute, if policymakers want to recover excess aid from wealthy districts while protecting vulnerable low-wealth districts, they could consider a phase-out of Save Harmless guaranteed aid for districts that exceed a certain wealth threshold (e.g., the top decile of Combined Wealth Ratio). Rather than an abrupt elimination, a graduated approach could phase out protections as district wealth increases, allowing time for adjustment while progressively redirecting funds to districts with greater need.

## Reexamination of STAR

Changes to the School Tax Relief (STAR) program might help bridge the gap between property-wealthy and property-poor districts. The STAR program provides a state-funded tax exemption that reduces school property taxes for certain homeowners, and the state reimburses school districts for the lost revenue. The program is well-intentioned at making homeownership more affordable, but it also seems to conflict in certain ways with the progressive goals of the Foundation Aid formula. The Citizens Budget Commission recently found that high-wealth districts receive roughly 40 percent more STAR funding per student (\$1,885) than low-wealth counterparts (\$1,355).<sup>27</sup> If policymakers wished to address this disparity, they could consider gradually phasing out STAR reimbursements for homeowners in districts with high median incomes and property values. The funds freed through such a phase-out could be redirected to the general pool of Foundation Aid.

## Conclusion

Money matters for educational outcomes.<sup>28</sup> The benefits of higher funding may include enabling districts to attract qualified teachers, reduce class sizes, and expand instructional supports, all of which research has found to be associated with better academic outcomes for students. Studies consistently find that better-funded school districts tend to have stronger student performance, including higher graduation rates and higher test scores, even after controlling for poverty and other factors. ,

The funding model in New York State recognizes this relationship and aims to distribute state aid equitably through its Foundation Aid formula. The formula works relatively well at equalizing total revenue for most districts, but property-wealthy districts in the top 10 to 20 percent have such an advantage in their ability to generate local revenue that state aid is currently insufficient to fully offset the disparity. As a result, students in property-wealthy districts may have access to more resources than their peers in property-poor districts.

This disparity warrants further attention from policymakers. In pursuing reform, New York State could consider structural changes to how the Foundation Aid formula determines minimum local contributions, such as eliminating funding cliffs or adjusting the caps on wealth indices. Policymakers could also reassess the Save Harmless provision, which disproportionately benefits wealthier districts. More incremental approaches could include modifying the School Tax Relief (STAR) program, while more far-reaching solutions could include the recapture provisions implemented in Texas and Wyoming. These ideas are important to consider as the state works toward supporting all students in New York with equitable funding.

## Appendix A: Property Wealth across Districts in New York State

[Table A1](#) ranks school districts by 2025 taxable full value of property, grouped into quintiles. The Big Five city school districts (New York City, Buffalo, Rochester, Syracuse, and Yonkers) are excluded. Source: New York State Comptroller’s Office. Real Property Tax Levies, Taxable Full Value, and Full Value Tax Rates. See file <https://www.osc.ny.gov/files/local-government/data/excel/2025-school-districts.xlsx>.

**TABLE A1 | Districts by Taxable Full Value Property Wealth, 2025**

| Lowest 20% (Quintile 1)       |                    |                       |                    |                                   |                    |
|-------------------------------|--------------------|-----------------------|--------------------|-----------------------------------|--------------------|
| District                      | Taxable Full Value | District              | Taxable Full Value | District                          | Taxable Full Value |
| South Mountain-Hickory Common | \$77,676,940       | Brushton-Moira        | \$293,644,246      | Lyons                             | \$413,517,519      |
| Whitesville                   | \$108,405,700      | Brocton               | \$294,189,350      | Clymer                            | \$414,054,930      |
| Friendship                    | \$111,141,505      | Edwards-Knox          | \$294,243,359      | Newcomb                           | \$417,543,649      |
| Ripley                        | \$121,238,381      | Pine Valley           | \$294,696,529      | Morrisville-Eaton                 | \$424,818,617      |
| Scio                          | \$144,696,296      | Hartford              | \$298,183,491      | York                              | \$430,734,439      |
| Canaseraga                    | \$145,502,846      | Salamanca             | \$301,513,092      | Alexander                         | \$431,865,399      |
| Brookfield                    | \$147,901,370      | Hinsdale              | \$302,188,399      | Unadilla Valley                   | \$431,905,760      |
| Van Hornesville-Owen D Young  | \$156,487,716      | Harrisville           | \$313,279,287      | Raquette Lake                     | \$432,460,089      |
| Andover                       | \$161,561,982      | Salmon River          | \$315,325,643      | Franklinville                     | \$432,914,451      |
| Wyoming                       | \$166,652,039      | Panama                | \$315,482,706      | Putnam                            | \$433,451,023      |
| Belfast                       | \$172,577,836      | Alfred-Almond         | \$317,013,361      | Oppenheim-Ephratah-St. Johnsville | \$438,671,438      |
| Stockbridge Valley            | \$195,176,336      | Cincinnatus           | \$321,315,434      | Bainbridge-Guilford               | \$439,719,031      |
| Elba                          | \$207,900,907      | Edmeston              | \$324,345,637      | Groton                            | \$445,864,741      |
| Hermon-Dekalb                 | \$209,955,108      | Afton                 | \$325,052,716      | Waterville                        | \$448,488,088      |
| Fort Edward                   | \$221,212,230      | Frewsburg             | \$328,647,446      | Argyle                            | \$457,000,385      |
| Mount Morris                  | \$224,167,535      | Oakfield-Alabama      | \$331,752,465      | Salem                             | \$458,126,792      |
| Sherman                       | \$232,553,812      | Portville             | \$334,005,063      | Manchester-Shortsville            | \$458,935,200      |
| Saint Regis Falls             | \$233,941,778      | Parishville-Hopkinton | \$337,255,646      | Canisteo-Greenwood                | \$460,500,724      |
| Laurens                       | \$236,126,275      | Remsen                | \$346,032,932      | West Canada Valley                | \$461,260,553      |
| Worcester                     | \$237,405,254      | Deruyter              | \$347,446,197      | New Suffolk Common                | \$461,972,000      |
| Sharon Springs                | \$241,267,407      | Hammond               | \$351,173,944      | Marion                            | \$463,376,724      |
| Bradford                      | \$242,078,156      | Moriah                | \$351,511,575      | Minerva                           | \$463,574,241      |
| Arkport                       | \$244,004,620      | Stamford              | \$352,705,132      | Tioga                             | \$464,960,005      |
| Morris                        | \$246,165,840      | Forestville           | \$356,094,927      | Westfield                         | \$470,388,511      |
| West Valley                   | \$246,494,738      | Morristown            | \$356,484,485      | Newfield                          | \$470,757,940      |
| Otselic Valley                | \$246,863,415      | Brasher Falls         | \$357,840,498      | Kendall                           | \$473,055,436      |
| Heuvelton                     | \$248,471,528      | Clyde-Savannah        | \$360,856,686      | Hancock                           | \$473,117,956      |
| Crown Point                   | \$252,471,517      | Milford               | \$362,459,523      | Oriskany                          | \$476,752,922      |
| Schenevus                     | \$255,901,466      | Chazy                 | \$362,642,361      | South Kortright                   | \$479,127,653      |
| Copenhagen                    | \$267,874,116      | Norwood-Norfolk       | \$365,306,560      | Little Falls                      | \$481,719,608      |
| Jefferson                     | \$269,982,966      | Dalton-Nunda          | \$368,079,814      | Hannibal                          | \$482,269,188      |
| Franklin                      | \$271,177,393      | Campbell-Savona       | \$368,808,480      | Richfield Springs                 | \$484,932,832      |
| Gilbertsville-Mount Upton     | \$272,306,633      | Oxford Academy And    | \$370,057,036      | Elmira Heights                    | \$485,038,739      |
| Green Island                  | \$273,078,604      | Madrid-Waddington     | \$374,953,916      | Clifton-Fine                      | \$485,489,605      |
| Fillmore                      | \$273,426,291      | Wynantskill           | \$377,395,265      | Inlet Common                      | \$489,500,211      |
| Glens Falls Common            | \$273,636,246      | Charlotte Valley      | \$379,161,947      | Warsaw                            | \$495,039,225      |
| Lyncourt                      | \$274,468,880      | Candor                | \$379,625,058      | Ogdensburg                        | \$495,990,372      |
| Bolivar-Richburg              | \$275,617,734      | Harpursville          | \$383,718,363      | Byron-Bergen                      | \$499,264,621      |
| Lisbon                        | \$277,757,518      | Fort Plain            | \$388,367,893      | Barker                            | \$501,136,024      |

**TABLE A1 | Districts by Taxable Full Value Property Wealth, 2025, *continued***

| Lowest 20% (Quintile 1) |                    |                        |                    |                |                    |
|-------------------------|--------------------|------------------------|--------------------|----------------|--------------------|
| District                | Taxable Full Value | District               | Taxable Full Value | District       | Taxable Full Value |
| McGraw                  | \$277,801,914      | Pavilion               | \$390,574,726      | North Collins  | \$505,049,248      |
| Jasper-Troupsburg       | \$278,808,301      | Marathon               | \$402,162,751      | Holley         | \$505,507,349      |
| Madison                 | \$280,241,311      | North Greenbush Common | \$402,634,393      | Sackets Harbor | \$509,747,856      |
| Prattsburgh             | \$280,380,655      | Chateaugay             | \$406,378,773      | Letchworth     | \$510,493,575      |
| Avoca                   | \$285,732,696      | Wheelerville           | \$411,918,522      | Port Byron     | \$516,447,424      |
| Genesee Valley          | \$293,623,957      | Lyndonville            | \$413,370,440      | Otego-Unadilla | \$517,711,174      |

| Low-Mid (Quintile 2)      |                    |   |                    |  |                    |
|---------------------------|--------------------|---|--------------------|--|--------------------|
| District                  | Taxable Full Value | District  | Taxable Full Value | District   | Taxable Full Value |
| Menands                   | \$518,877,810      | Lake Pleasant   | \$638,904,604      | Mayfield   | \$793,977,498      |
| Dolgeville                | \$524,406,084      | Andes   | \$640,955,311      | Deposit  | \$802,049,045      |
| Fabius-Pompey             | \$524,586,385      | La Fargeville   | \$641,844,694      | Randolph   | \$803,177,496      |
| Lafayette                 | \$525,567,022      | Duanesburg  | \$645,943,550      | Seneca Falls   | \$804,489,324      |
| Gananda                   | \$528,500,302      | Fort Ann  | \$648,148,637      | Hoosic Valley  | \$804,835,506      |
| Canajoharie               | \$530,944,713      | Medina  | \$652,500,899      | Royalton-Hartland  | \$806,564,681      |
| Hornell                   | \$533,201,884      | Canton  | \$653,096,824      | Susquehanna Valley<br>Lowville Academy &<br>Central School | \$806,853,547      |
| New York Mills            | \$534,556,368      | Bath  | \$654,572,358      | Albion   | \$808,562,652      |
| Cassadaga Valley          | \$538,073,913      | Pembroke  | \$657,397,035      | Long Lake  | \$811,462,736      |
| Cato-Meridian             | \$543,898,341      | Wayland-Cohocton  | \$664,882,077      | Johnsburg  | \$815,675,710      |
| Spencer-Van Etten         | \$544,509,396      | Gouverneur  | \$672,863,337      | Roxbury  | \$816,180,490      |
| Falconer                  | \$549,638,262      | Northern Adirondack   | \$683,731,858      | Norwich  | \$826,390,038      |
| Pulaski                   | \$549,738,840      | Le Roy  | \$685,953,501      | Potsdam  | \$830,045,644      |
| Wells                     | \$562,300,824      | Rensselaer  | \$686,569,183      | Warrensburg  | \$832,915,412      |
| Onondaga                  | \$563,602,182      | Williamson  | \$686,698,315      | Dundee   | \$833,242,094      |
| Sidney                    | \$565,076,275      | Cuba-Rushford   | \$686,901,655      | Dunkirk  | \$837,110,962      |
| Wellsville                | \$565,883,008      | Sodus   | \$688,661,264      | Keene  | \$839,363,733      |
| Newark Valley             | \$568,115,231      | Waverly   | \$690,876,217      | Union Springs  | \$844,211,058      |
| Frankfort-Schuyler        | \$570,419,815      | Whitehall   | \$696,896,995      | Solvay   | \$852,797,452      |
| Red Creek                 | \$570,465,421      | Beaver River  | \$697,992,873      | Moravia  | \$859,355,361      |
| Addison                   | \$570,691,735      | Watervliet  | \$700,403,684      | East Rochester   | \$864,925,228      |
| Odessa-Montour            | \$572,404,805      | Middleburgh   | \$701,996,185      | Bemus Point  | \$872,285,897      |
| Romulus                   | \$574,394,101      | Willsboro   | \$702,942,180      | Tupper Lake  | \$877,096,442      |
| Lyme                      | \$577,601,683      | Dansville   | \$704,269,909      | Johnstown  | \$878,776,987      |
| Gowanda                   | \$578,506,077      | Altmar-Parish-<br>Williamstown  | \$704,478,492      | Northville   | \$889,731,925      |
| Whitney Point             | \$579,498,488      | Chenango Forks<br>Central Valley Central<br>School District At Ilion-<br>Mohawk | \$707,132,879      | Berlin   | \$897,266,109      |
| Colton-Pierrepont         | \$584,281,432      | Hoosick Falls   | \$712,039,908      | Holland Patent   | \$898,516,520      |
| Caledonia-Mumford         | \$585,820,296      | Waterford-Halfmoon  | \$712,380,286      | Wilson   | \$902,022,643      |
| Greene                    | \$591,786,689      | Allegany-Limestone  | \$716,581,483      | Berne-Knox-Westerlo  | \$904,378,010      |
| Hamilton                  | \$596,462,879      | Tully   | \$717,282,236      | Schodack   | \$907,229,007      |
| Weedsport                 | \$596,795,000      | Edinburg Common   | \$718,460,937      | Gilboa-Conesville  | \$909,869,793      |
| Cherry Valley-Springfield | \$600,853,799      | Wheatland-Chili   | \$724,759,838      | Livingston Manor   | \$912,546,399      |
| Westmoreland              | \$602,232,630      | East Bloomfield   | \$725,271,471      | Greenwich  | \$921,506,744      |
| Herkimer                  | \$602,596,331      | Sandy Creek   | \$732,176,268      | Florida  | \$937,123,967      |
| Sauquoit Valley           | \$609,674,898      | Belleville-Henderson  | \$733,446,725      | Indian Lake  | \$938,512,946      |
| Sherburne-Earlville       | \$611,238,125      | Canastota   | \$733,981,806      | South Seneca   | \$943,073,198      |
| Perry                     | \$613,037,003      | Poland  | \$742,985,960      | South Jefferson  | \$946,494,149      |
| Piseco Common             | \$613,298,047      | Cambridge   | \$744,743,968      | Corinth  | \$949,194,151      |
| Schoharie                 | \$613,701,456      |   | \$755,054,839      |  |                    |

**TABLE A1 | Districts by Taxable Full Value Property Wealth, 2025, *continued***

| Low-Mid (Quintile 2)      |                    |   |                    |                        |                    |
|---------------------------|--------------------|---|--------------------|------------------------|--------------------|
| District                  | Taxable Full Value | District  | Taxable Full Value | District               | Taxable Full Value |
| Silver Creek              | \$619,614,644      | Northeastern Clinton  | \$761,698,926      | Phelps-Clifton Springs | \$953,749,213      |
| Mount Markham             | \$622,640,585      | Jordan-Elbridge   | \$766,880,758      | Geneseo                | \$954,106,233      |
| Cattaraugus-Little Valley | \$626,165,570      | Walton  | \$771,016,703      | Holland                | \$957,290,080      |
| Granville                 | \$627,235,313      | Boquet Valley Central School District at Elizabethtown-Lewis-Westport | \$775,855,741      | Chenango Valley        | \$965,855,798      |
| Roscoe                    | \$628,131,473      | Olean   | \$778,190,299      | Cleveland Hill         | \$971,015,813      |
| Avon                      | \$632,164,044      | Highland Falls-Fort Montgomery  | \$792,999,066      |                        |                    |

| Middle (Quintile 3)                               |                    |                                |                    |                         |                    |
|---|--------------------|--------------------------------|--------------------|-------------------------|--------------------|
| District  | Taxable Full Value | District                       | Taxable Full Value | District                | Taxable Full Value |
| Saranac   | \$971,132,941      | Schroon Lake                   | \$1,241,375,157    | Ellicottville           | \$1,569,729,916    |
| Alexandria  | \$972,812,517      | Livonia                        | \$1,259,139,384    | Depew                   | \$1,575,478,987    |
| Honeoye   | \$973,163,038      | Johnson City                   | \$1,273,451,288    | Cazenovia               | \$1,577,375,547    |
| Southern Cayuga                                   | \$974,972,249      | Chester                        | \$1,277,746,871    | Thousand Islands        | \$1,641,484,508    |
| Trumansburg                                       | \$976,365,812      | Greenville                     | \$1,285,646,361    | Gorham-Middlesex        | \$1,654,073,538    |
| Southwestern                                      | \$981,560,510      | Fulton                         | \$1,285,954,818    | Glens Falls             | \$1,656,566,095    |
| Clinton   | \$982,553,811      | Hudson Falls                   | \$1,291,057,173    | Haldane                 | \$1,666,042,076    |
| Gloversville                                      | \$987,111,865      | Hammondsport                   | \$1,294,126,993    | Roosevelt               | \$1,669,810,667    |
| Fonda-Fultonville                                 | \$994,231,333      | Batavia                        | \$1,294,886,896    | Center Moriches         | \$1,692,318,491    |
| Waterloo  | \$995,356,614      | Mechanicville                  | \$1,304,877,222    | Ellenville              | \$1,715,113,720    |
| Attica  | \$1,010,919,165    | Plattsburgh                    | \$1,307,222,733    | Ticonderoga             | \$1,729,800,508    |
| Newfane   | \$1,014,121,594    | Homer                          | \$1,307,975,588    | Beekmantown             | \$1,742,936,448    |
| Mexico  | \$1,017,287,738    | Dover                          | \$1,313,902,951    | Amsterdam               | \$1,770,920,601    |
| New Lebanon                                       | \$1,020,327,190    | Germantown                     | \$1,321,177,513    | Coxsackie-Athens        | \$1,781,381,599    |
| Adirondack  | \$1,022,454,719    | Spackenkill                    | \$1,321,629,603    | Fallsburg               | \$1,782,086,049    |
| North Rose-Wolcott                                | \$1,029,716,865    | Eden                           | \$1,322,173,276    | Cairo-Durham            | \$1,794,733,289    |
| Phoenix   | \$1,030,049,359    | Garrison                       | \$1,324,571,177    | Evans-Brant             | \$1,819,551,948    |
| South Lewis                                       | \$1,031,894,038    | Marcellus                      | \$1,327,651,822    | Wayne                   | \$1,820,830,486    |
| Lackawanna  | \$1,033,000,711    | Malone                         | \$1,330,864,483    | Chautauqua Lake         | \$1,826,752,870    |
| Massena   | \$1,033,859,127    | Peru                           | \$1,333,065,721    | Pawling                 | \$1,834,705,156    |
| Jamestown   | \$1,044,997,907    | Tuxedo                         | \$1,337,887,234    | Tri-Valley              | \$1,873,838,524    |
| Galway  | \$1,047,380,858    | Cohoes                         | \$1,343,710,947    | Port Jervis             | \$1,886,538,910    |
| Indian River                                      | \$1,054,653,633    | Tonawanda                      | \$1,347,673,576    | Hunter-Tannersville     | \$1,898,238,694    |
| Sherrill  | \$1,057,849,569    | Ausable Valley                 | \$1,353,256,408    | Tuckahoe                | \$1,908,973,723    |
| General Brown                                     | \$1,064,201,313    | Liberty                        | \$1,353,801,064    | Highland                | \$1,911,432,256    |
| Brunswick   | \$1,065,422,683    | Lansing                        | \$1,371,593,667    | Ravena-Coeymans-Selkirk | \$1,933,898,054    |
| Naples  | \$1,077,411,346    | Watkins Glen                   | \$1,372,439,128    | North Merrick           | \$1,966,944,667    |
| Carthage  | \$1,081,670,073    | Margaretville                  | \$1,386,414,799    | Union-Endicott          | \$1,983,079,640    |
| Windsor   | \$1,095,724,439    | Stillwater                     | \$1,393,984,801    | East Rockaway           | \$1,988,476,000    |
| Oneida  | \$1,096,692,704    | Voorheesville                  | \$1,402,445,125    | Honeoye Falls-Lima      | \$1,992,630,012    |
| Fredonia  | \$1,104,056,548    | Wyandanch                      | \$1,423,351,642    | Catskill                | \$1,993,217,759    |
| Newark  | \$1,109,012,344    | Cooperstown                    | \$1,425,900,680    | North Warren            | \$1,996,982,316    |
| Delaware Academy Central School District At Delhi | \$1,142,460,784    | Eldred                         | \$1,426,623,186    | Watertown               | \$1,999,235,746    |
| Palmyra-Macedon                                   | \$1,154,461,730    | Broadalbin-Perth               | \$1,459,625,192    | Cheektowaga-Maryvale    | \$2,021,632,540    |
| Akron   | \$1,162,969,011    | Kiryas Joel Village            | \$1,467,816,014    | Northeast               | \$2,029,021,474    |
| Maine-Endwell                                     | \$1,179,971,611    | Yorkshire-Pioneer              | \$1,473,020,622    | Putnam Valley           | \$2,043,383,090    |
| Greenwood Lake                                    | \$1,189,554,247    | East Moriches                  | \$1,482,168,302    | Schalmon                | \$2,048,897,704    |
| Camden  | \$1,196,031,008    | Schuylerville                  | \$1,485,375,768    | Elmsford                | \$2,070,502,650    |
| Dryden  | \$1,198,527,546    | Springville-Griffith Institute | \$1,494,708,698    | Brockport               | \$2,091,963,861    |
| Owego-Apalachin                                   | \$1,205,510,040    | Geneva                         | \$1,497,104,160    | Rotterdam-Mohonasen     | \$2,133,693,305    |

**TABLE A1 | Districts by Taxable Full Value Property Wealth, 2025, *continued***

| Middle (Quintile 3)      |                    |                |                    |              |                    |
|--------------------------|--------------------|----------------|--------------------|--------------|--------------------|
| District                 | Taxable Full Value | District       | Taxable Full Value | District     | Taxable Full Value |
| Lansingburgh             | \$1,211,101,789    | Alden          | \$1,497,488,217    | New Hartford | \$2,133,729,889    |
| Downsville               | \$1,213,093,197    | Oneonta        | \$1,498,328,826    | Dobbs Ferry  | \$2,145,764,303    |
| Chittenango              | \$1,217,571,444    | Cortland       | \$1,520,371,508    | Binghamton   | \$2,147,023,538    |
| Westhill                 | \$1,236,116,304    | Hadley-Luzerne | \$1,539,218,845    | Island Park  | \$2,152,211,333    |
| Cobleskill-Richmondville | \$1,239,593,624    | Fishers Island | \$1,546,338,727    |              |                    |

| High-Mid (Quintile 4)  |                    |                           |                    |  |                    |
|------------------------|--------------------|---------------------------|--------------------|--|--------------------|
| District               | Taxable Full Value | District                  | Taxable Full Value | District                                     | Taxable Full Value |
| Marlboro               | \$2,160,321,979    | Wallkill                  | \$2,807,503,029    | Pearl River                                  | \$3,493,107,376    |
| Windham-Ashland-Jewett | \$2,189,362,460    | Valley Stream 24          | \$2,820,474,000    | Goshen                                       | \$3,521,479,585    |
| Scotia-Glenville       | \$2,226,954,156    | Greenport                 | \$2,826,046,364    | Skaneateles                                  | \$3,559,653,093    |
| Bolton                 | \$2,253,347,205    | Babylon                   | \$2,864,171,194    | Hendrick Hudson                              | \$3,565,210,332    |
| Whitesboro             | \$2,256,351,748    | South Glens Falls         | \$2,876,409,424    | Union Free School District Of The Tarrytowns | \$3,612,534,854    |
| Elmira                 | \$2,266,722,757    | East Syracuse Minoa       | \$2,876,440,639    | Bronxville                                   | \$3,629,800,930    |
| West Irondequoit       | \$2,267,832,440    | Vestal                    | \$2,882,971,561    | East Quogue                                  | \$3,656,693,159    |
| Pleasantville          | \$2,284,940,531    | Nanuet                    | \$2,894,407,870    | Saugerties                                   | \$3,658,934,985    |
| Millbrook              | \$2,286,554,392    | Churchville-Chili         | \$2,902,671,118    | Beacon                                       | \$3,677,506,139    |
| Kinderhook             | \$2,304,193,786    | Burnt Hills-Ballston Lake | \$2,933,093,537    | Canandaigua                                  | \$3,690,918,460    |
| Oswego                 | \$2,318,949,926    | Mount Sinai               | \$2,937,789,623    | Fayetteville-Manlius                         | \$3,696,340,130    |
| East Irondequoit       | \$2,354,849,154    | Queensbury                | \$2,948,653,004    | Mount Pleasant                               | \$3,711,562,248    |
| East Aurora            | \$2,355,577,200    | Corning                   | \$2,960,621,740    | Port Jefferson                               | \$3,723,597,925    |
| North Salem            | \$2,367,905,666    | Seafood                   | \$2,961,754,000    | Schenectady                                  | \$3,763,358,685    |
| Central Square         | \$2,374,665,640    | Edgemont                  | \$2,964,732,288    | Islip  | \$3,775,330,394    |
| Rome                   | \$2,396,881,872    | West Hempstead            | \$2,975,826,000    | Taconic Hills                                | \$3,784,418,688    |
| Briarcliff Manor       | \$2,399,499,512    | Rye Neck                  | \$2,983,070,896    | Carle Place                                  | \$3,785,151,429    |
| Averill Park           | \$2,427,308,170    | Horseheads                | \$2,999,582,138    | Niskayuna                                    | \$3,802,651,599    |
| Cheektowaga            | \$2,446,865,995    | Cornwall                  | \$3,052,256,301    | Eastport-South Manor                         | \$3,857,349,995    |
| Peekskill              | \$2,454,619,665    | Pocantico Hills           | \$3,054,441,536    | North Bellmore                               | \$3,869,378,000    |
| Hastings-On-Hudson     | \$2,458,373,691    | Hilton                    | \$3,055,372,888    | Baldwinsville                                | \$3,909,726,401    |
| Red Hook               | \$2,465,353,419    | Ardsley                   | \$3,094,472,872    | Penfield                                     | \$3,938,128,713    |
| Auburn                 | \$2,488,692,542    | Amherst                   | \$3,103,266,174    | Remsenburg-Speonk                            | \$3,961,830,432    |
| Chatham                | \$2,500,318,312    | Grand Island              | \$3,136,506,279    | Sayville                                     | \$3,992,850,507    |
| Jamesville-Dewitt      | \$2,513,879,657    | Bayport-Blue Point        | \$3,151,775,979    | Merrick                                      | \$3,992,977,333    |
| Starpoint              | \$2,556,682,134    | Niagara-Wheatfield        | \$3,154,365,949    | Hyde Park                                    | \$4,085,763,035    |
| Lewiston-Porter        | \$2,558,925,172    | Iroquois                  | \$3,205,005,584    | Valley Stream 13                             | \$4,086,190,000    |
| Troy                   | \$2,608,052,298    | Town Of Webb              | \$3,218,042,646    | Washingtonville                              | \$4,132,384,223    |
| Island Trees           | \$2,618,500,667    | Rhinebeck                 | \$3,219,949,273    | Rondout Valley                               | \$4,143,969,008    |
| Niagara Falls          | \$2,649,292,874    | Saranac Lake              | \$3,225,073,281    | Shoreham-Wading River                        | \$4,149,115,314    |
| Sullivan West          | \$2,657,410,767    | Miller Place              | \$3,239,050,189    | Brookhaven-Comsewogue                        | \$4,168,610,377    |
| Poughkeepsie           | \$2,683,164,976    | New Paltz                 | \$3,256,905,596    | Floral Park-Bellerose                        | \$4,213,982,381    |
| Oysterponds            | \$2,683,938,182    | Valley Stream 30          | \$3,261,310,667    | Pelham                                       | \$4,215,841,126    |
| Pine Plains            | \$2,688,751,353    | Rocky Point               | \$3,263,460,377    | Franklin Square                              | \$4,246,530,000    |
| Lockport               | \$2,689,479,201    | Irvington                 | \$3,285,607,439    | Fire Island                                  | \$4,252,363,581    |
| Spencerport            | \$2,710,587,621    | Brighton                  | \$3,308,851,432    | Pine Bush                                    | \$4,277,559,401    |
| Blind Brook-Rye        | \$2,727,938,030    | Hamburg                   | \$3,324,456,844    | Nyack  | \$4,317,166,537    |
| Bellmore               | \$2,731,360,000    | Gates-Chili               | \$3,326,783,136    | Lake George                                  | \$4,416,620,763    |
| Croton-Harmon          | \$2,766,966,481    | Elwood                    | \$3,351,411,837    | Brewster                                     | \$4,456,565,057    |
| Valhalla               | \$2,768,408,114    | West Genesee              | \$3,363,699,279    | East Greenbush                               | \$4,520,628,043    |
| Hudson                 | \$2,770,906,536    | Minisink Valley           | \$3,382,642,060    | Amityville                                   | \$4,538,440,086    |
| Malverne               | \$2,777,404,000    | East Williston            | \$3,392,965,714    | Sweet Home                                   | \$4,540,539,293    |
| Penn Yan               | \$2,783,286,398    | Plainedge                 | \$3,415,554,286    | Victor                                       | \$4,579,291,753    |
| Utica                  | \$2,788,740,271    | Lake Placid               | \$3,421,903,110    | Greenburgh                                   | \$4,600,846,561    |
| North Tonawanda        | \$2,791,708,304    | Wantagh                   | \$3,433,266,667    |  |                    |

**TABLE A1 | Districts by Taxable Full Value Property Wealth, 2025, *continued***

| Highest 20% (Quintile 5)       |                    |                        |                    |                          |                    |
|--------------------------------|--------------------|------------------------|--------------------|--------------------------|--------------------|
| District                       | Taxable Full Value | District               | Taxable Full Value | District                 | Taxable Full Value |
| Warwick Valley                 | \$4,610,069,742    | West Seneca            | \$5,891,537,086    | South Huntington         | \$8,692,947,755    |
| Copiapue                       | \$4,613,254,478    | Westbury               | \$5,919,845,143    | Westhampton Beach        | \$8,900,095,733    |
| Bethlehem                      | \$4,625,005,086    | Herricks               | \$5,932,057,143    | Long Beach               | \$8,984,341,667    |
| Ballston Spa                   | \$4,628,125,904    | Levittown              | \$5,947,647,333    | Freeport                 | \$9,066,442,667    |
| Monticello                     | \$4,637,400,342    | Orchard Park           | \$5,977,609,474    | Huntington               | \$9,111,114,694    |
| Port Chester-Rye Valley        | \$4,671,034,406    | Rockville Centre       | \$6,042,436,667    | Amagansett               | \$9,210,879,143    |
| Valley                         | \$4,720,732,765    | West Islip             | \$6,181,945,451    | Massapequa               | \$9,376,296,429    |
| Yorktown                       | \$4,721,170,351    | Hampton Bays           | \$6,229,101,833    | Commack                  | \$9,487,824,760    |
| Central Islip                  | \$4,763,097,197    | William Floyd          | \$6,253,575,472    | Montauk                  | \$9,622,714,286    |
| Lynbrook                       | \$4,790,205,333    | Pittsford              | \$6,301,128,396    | Connetquot               | \$9,705,844,000    |
| Bethpage                       | \$4,805,206,429    | Onteora                | \$6,353,855,680    | Brentwood                | \$9,729,219,535    |
| Wainscott Common               | \$4,822,483,301    | Rush-Henrietta         | \$6,405,018,352    | Sagaponack Common        | \$9,793,662,311    |
| Tuckahoe Common                | \$4,823,822,386    | Katonah-Lewisboro      | \$6,534,000,924    | Garden City              | \$9,851,846,000    |
| North Babylon                  | \$4,857,383,284    | Lakeland               | \$6,557,220,584    | Longwood                 | \$9,973,754,528    |
| Frontier                       | \$4,881,941,506    | Lindenhurst            | \$6,576,559,851    | Middle Country           | \$10,000,991,132   |
| Somers                         | \$4,892,675,953    | Chappaqua              | \$6,787,128,719    | Rye                      | \$10,297,126,357   |
| Liverpool                      | \$4,948,018,566    | Bay Shore              | \$6,815,776,817    | Bedford                  | \$10,309,397,210   |
| Baldwin                        | \$4,978,601,333    | Quogue                 | \$7,071,315,987    | Manhasset                | \$10,387,302,143   |
| Mahopac                        | \$5,019,936,021    | Hempstead              | \$7,075,830,000    | Three Village            | \$10,437,820,443   |
| West Babylon                   | \$5,023,281,642    | Byram Hills            | \$7,081,865,415    | Hicksville               | \$10,756,670,714   |
| Carmel                         | \$5,047,685,607    | North Colonie          | \$7,188,471,731    | Harrison                 | \$10,778,475,861   |
| Middletown                     | \$5,049,212,533    | Springs                | \$7,196,634,000    | Riverhead                | \$11,051,142,499   |
| Deer Park                      | \$5,055,678,507    | Kenmore-Tonawanda      | \$7,212,231,896    | Mamaroneck               | \$11,199,309,520   |
| Cold Spring Harbor             | \$5,079,683,469    | Haverstraw-Stony Point | \$7,314,239,520    | Port Washington          | \$11,205,076,429   |
| South Country                  | \$5,085,019,434    | Greece                 | \$7,345,437,282    | Shenendehowa             | \$11,330,989,793   |
| Oyster Bay-East Norwich        | \$5,096,600,714    | Ithaca                 | \$7,492,901,463    | Saratoga Springs         | \$11,359,495,393   |
| Harborfields                   | \$5,151,123,061    | Suffern                | \$7,502,941,764    | Clarkstown               | \$11,427,663,671   |
| Guilderland                    | \$5,248,490,670    | Albany                 | \$7,541,795,222    | White Plains             | \$11,767,804,304   |
| East Islip                     | \$5,251,742,535    | Monroe-Woodbury        | \$7,635,480,196    | Williamsville            | \$12,341,786,800   |
| Locust Valley                  | \$5,256,409,286    | Mattituck-Cutchogue    | \$7,665,324,697    | Scarsdale                | \$12,495,281,338   |
| Eastchester                    | \$5,333,004,043    | Kingston               | \$7,714,749,853    | Wappingers               | \$12,868,801,013   |
| Ossining                       | \$5,344,045,049    | Newburgh               | \$7,840,288,522    | Lawrence                 | \$13,023,317,333   |
| South Orangetown               | \$5,347,766,842    | Elmont                 | \$7,862,338,000    | Syosset                  | \$13,255,745,510   |
| Hewlett-Woodmere               | \$5,358,310,000    | Mineola                | \$7,928,618,571    | New Rochelle             | \$13,838,644,456   |
| Glen Cove                      | \$5,571,116,513    | Jericho                | \$7,973,530,715    | Smithtown                | \$13,946,825,581   |
| South Colonie                  | \$5,589,241,610    | Hauppauge              | \$7,984,035,654    | Northport-East Northport | \$14,590,465,918   |
| Kings Park                     | \$5,597,963,023    | Roslyn                 | \$8,093,336,428    | Bridgehampton            | \$14,841,548,981   |
| Fairport                       | \$5,667,035,718    | Farmingdale            | \$8,120,174,467    | Sag Harbor               | \$15,019,584,079   |
| Southold                       | \$5,671,377,818    | Patchogue-Medford      | \$8,176,716,415    | Uniondale                | \$16,243,677,333   |
| Shelter Island                 | \$5,718,450,403    | Arlington              | \$8,213,526,787    | Sachem                   | \$16,514,097,690   |
| Clarence                       | \$5,731,403,479    | Webster                | \$8,312,042,020    | East Ramapo              | \$17,208,099,470   |
| New Hyde Park-Garden City Park | \$5,812,338,953    | Plainview-Old Bethpage | \$8,457,482,143    | Half Hollow Hills        | \$18,362,730,749   |
| North Syracuse                 | \$5,823,164,476    | East Meadow            | \$8,467,370,000    | Great Neck               | \$23,756,187,143   |
| North Shore                    | \$5,826,277,857    | Oceanside              | \$8,516,438,667    | East Hampton             | \$28,210,966,857   |
| Lancaster                      | \$5,890,618,372    | Mount Vernon           | \$8,602,075,088    | Southampton              | \$47,625,460,346   |

## Appendix B

New York’s Foundation Aid formula gives school districts two options to calculate their expected local contribution to education costs. Districts may choose whichever option results in the smallest local contribution and the largest payment under the Foundation Aid formula.

**TABLE B1 | Expected Minimum Local Contribution (EMLC)**

| Component                 | Description  |
|---------------------------|--|
| Purpose                   | Estimates how much revenue the state expects a district to contribute in local revenue, based on property wealth and resident income.  |
| Current Usage             | Used by 12 school districts (as of 2024-25).   |
| Key Inputs                | Selected Actual Value (property wealth per pupil), Income Wealth Index, and Local Tax Factor.  |
| Income Wealth Index (IWI) | District adjusted gross income per pupil divided by statewide average. Current floor is 0.65 and the ceiling is 2.0. An IWI of 1.0 equals the state average; 0.5 equals half; 2.0 equals double.<br>Scale: 1.0 = State Avg; 0.5 = Half of Avg; 2.0 = Double Avg. |
| Local Tax Factor          | Approximates potential revenue if the district taxed residents at 90 percent of the 3-year average tax rate statewide.   |
| Binding Status            | Nonbinding. Districts may contribute less local revenue, but state contribution is fixed by the calculation.   |

**TABLE B2 | Foundation Aid State Sharing Ratio (FASSR)**

| Component                                    | Description   |
|--|---|
| Purpose                                      | Determines the state’s percentage share of funding. Poorer districts receive a higher ratio; wealthier districts receive a lower ratio.   |
| Current Usage                                | Used by 611 school districts (as of 2024-25).   |
| Foundation Aid Combined Wealth Ratio (FACWR) | Combines district property value and income per pupil, each weighted at 50%, relative to statewide averages. A ratio of 1.0 equals average wealth; below 1.0 indicates lower wealth; above 1.0 indicates higher wealth. |
| Tier Structure                               | Four tiers based on FACWR, each with a distinct formula: Tier 1 ( $\leq 0.627$ , lowest wealth) through Tier 4 ( $\geq 1.336$ , highest wealth). Districts receive the greatest result among applicable formulas.       |
| State Sharing Ratio Range                    | Ranges from 0% to 93% (capped maximum). Lower-wealth districts receive higher ratios (more state aid); higher-wealth districts receive lower ratios.  |
| \$500 Flat Grant Option                      | Districts where both EMLC and FAASSR yield less than \$500 per pupil may instead opt for a guaranteed \$500 flat grant.   |

SOURCE: Adapted from Rockefeller Institute of Government, *Foundation Aid Report* (2024), pp. 195–205.



# ENDNOTES

- 1 C. Kirabo Jackson and Claudia Persico, "Point Column on School Spending: Money Matters," *Journal of Policy Analysis and Management* 42, no. 4 (2023): 1118-24, <https://doi.org/10.1002/pam.22520>.
- 2 *A Review of New York State's Foundation Aid Education Funding Formula with Recommendations for Improvement* (Albany, NY: Rockefeller Institute of Government, December 2024), <https://rockinst.org/issue-area/a-review-of-new-york-states-foundation-aid-education-funding-formula-with-recommendations-for-improvement/>.
- 3 "Enrollment Database," Data Downloads, New York State Education Department, accessed March 23, 2026, <https://data.nysed.gov/downloads.php>.
- 4 "Real Property Tax Levies, Taxable Full Value and Full Value Tax Rates," New York State Office of the State Comptroller, accessed March 26, 2026, <https://www.osc.ny.gov/local-government/data/real-property-tax-levies-taxable-full-value-and-full-value-tax-rates>.
- 5 Property values from New York State Comptroller and enrollment from NYSED School District Profiles (Southampton: \$47.6B, 1,222 pupils; Friendship: \$111.1M, 241 pupils).
- 6 Stephen Q. Cornman, et al., *Revenues and Expenditures for Public Elementary and Secondary Education: School Year 2022–23 (Fiscal Year 2023): First Look*, NCES 2025-302 (Washington, DC: US Department of Education, National Center for Education Statistics, 2025), <http://nces.ed.gov/pubsearch>.
- 7 N.Y. Const. art. 13, *Special Provisions Relating to School Districts*, <https://www.nysenate.gov/legislation/laws/RPT/A13>.
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- 9 *Levittown Union Free Sch. Dist. v. Nyquist*, 57 N.Y.2d 27, 47 (1982).
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