KANSAS RURAL OPPORTUNITY ZONES

Program Evaluation and Recommendations

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Executive Summary

The state of Kansas is committed to strengthening rural communities through data-driven and community-directed investment. Testifying before the House Rural Revitalization Committee in February 2019, Kansas Commerce Secretary David Toland reinforced this commitment to rural prosperity, saying *"Governor Kelly has made rural Kansas a priority, as has the Legislature. This matters because what happens in rural Kansas matters to our entire state – to our economy, to our politics and to our identity as Kansans."*

As a part of her plan for rural revitalization, Governor Kelly has instructed her administration to conduct a comprehensive review of existing policies and programs to ensure that the state is investing in the most beneficial and evidence-based initiatives for rural communities.

This report reviews the **Kansas Rural Opportunity Zones (ROZ) program**, a rural repopulation initiative established in 2012 to slow or reverse out-migration in rural counties. ROZ provides income tax waivers and student-loan repayment assistance to eligible residents of targeted rural counties. Using administrative and survey data, this report examines the impact of the Rural Opportunity Zones program on statewide population trends and the Kansas economy.

This analysis finds that the ROZ program did not successfully meet its primary goal of independently reducing rural depopulation. Table 1 (Page 3) shows that county-level population data trends across the duration of the program **illustrate sustained out-migration in 91% of ROZ communities.** Only two ROZ counties had more than a 1% increase in population through the program. Further, ROZ did little to influence rural relocation decisions. Survey data found that the majority of program participants would have moved to a Rural Opportunity Zones county even without the program's financial incentives. Only a minimal number of counties even had participants who indicated the program was their primary factor for relocation.

Additionally, this report attempted to analyze the program's economic impact using a set of economic multipliers**. Given the significant limitations associated with this analysis, it is difficult to estimate with any degree of certainty whether ROZ had an impact on the overall Kansas economy.** Estimates show that the program could have created a limited amount (seven to ten percent) of net economic activity through transfers to participants. However, estimates of the economic impact generated by ROZ should be viewed cautiously. These results are imprecise and sensitive to assumptions concerning taxes, savings and imports. Further, data shows that ROZ has a **relatively limited return on investment** when compared with other Kansas Department of Commerce (KDC) rural investment programs like the Kansas Main Street program.

This report concludes that the Kansas Rural Opportunity Zones did not meet its stated goal of incentivizing relocation to rural communities and only generated a limited return on investment. Given these findings, **Kansas should work with stakeholders to restructure the ROZ program** to better utilize public funds. These strategy changes should be developed through comprehensive partnership with rural communities on local needs, feedback on existing programs and ideas for data-driven state investment.

This report offers the following **recommendation**:

Kansas should engage with rural communities to restructure the ROZ program by developing locally-driven and tailored investment options that are evidence-based and meet community needs. To determine the best investment options, the Department of Commerce should partner with rural stakeholders to collect community feedback and study best practices. The state can then help local jurisdictions develop and administer their own rural development, work or repopulation incentive programs driven by local priorities. For example, high-impact programs like the Kansas Main Street program can help revitalize rural centers by improving rural quality of life and creating an attractive incentive for rural repopulation. One-size-fits-all programs like the current version of ROZ are hampered by blunt statewide restrictions and administrative delays. Rural communities know best how to develop and administer locally-tailored programs that are responsive to local employment and community needs. Communities seeking to establish their own initiatives can leverage community foundations, local employers, and existing Department of Commerce resources to establish innovative recruitment solutions and regional strategies like remote workforce programs.

Table 1: Percent Population Change in ROZ Counties Over the Duration of the ROZ Program, as of October 2019

Region	County	ROZ Participation Start Date (Tax Credit)	Percent Change Over ROZ Program Duration
SC	Kingman	2011	↓ 6.65
NC	Russell	2011	↓ 1.02
NC	Rooks	2011	↓ 3.82
NW	Scott	2011	↑ 0.55
NW	Greeley	2011	↓ 3.39
SE	Woodson	2011	↓ 2.57
SW	Hodgeman	2011	↓ 7.43
NW	Trego	2011	↓ 5.93
NW	Graham	2011	↓ 3.67
SW	Hamilton	2011	↓ 1.06
SW	Kearny	2011	↓ 1.00
NW	Ness	2011	↓ 7.88
SC	Pratt	2011	↓ 4.03
SC	Barber	2011	↓ 8.10
SW	Clark	2011	↓ 7.99
SC	Harper	2011	↓ 6.02
NW	Sherman	2011	↓ 3.39
SW	Edwards	2011	↓ 4.40
NC	Smith	2011	↓ 3.95
NW	Thomas	2011	↓ 2.86
NW	Decatur	2011	↓ 0.21
SE	Greenwood	2011	↓ 5.98
NW	Norton	2011	↓ 2.98
SC	Stafford	2011	↓ 3.80
NW	Cheyenne	2011	↓ 0.64
NW	Logan	2011	↑ 1.86
SW	Kiowa	2011	↑ 0.44
NC	Lincoln	2011	↓ 4.64
NE	Cloud	2011	↓ 7.21
NC	Phillips	2011	↓ 3.61
SC	Marion	2011	↓ 3.47
SE	Chautauqua	2011	↓ 7.18
NW	Gove	2011	↓ 4.04
SE	Wilson	2011	↓ 5.05
SW	Pawnee	2011	↓ 4.82
SE	Elk	2011	↓ 6.35
NW	Rawlins	2011	↓ 1.26
NE	Republic	2011	↓ 3.78
SW	Comanche	2011	↓ 8.48

Region	County	ROZ Participation Start Date (Tax Credit)	Percent Change Over ROZ Program Duration
NC	Osborne	2011	↓ 8.98
NW	Sheridan	2011	↑ 0.08
NE	Washington	2011	↓ 5.34
SW	Stanton	2011	↓ 8.14
NC	Mitchell	2011	↓ 2.90
SW	Morton	2011	↓ 14.9
NW	Lane	2011	↓ 8.29
NC	Rush	2011	↓ 3.58
NW	Wichita	2011	↓ 5.61
NC	Jewell	2011	↓ 6.55
NW	Wallace	2011	↓ 1.64
SW	Grant	2013	↓ 6.21
SW	Gray	2013	↑ 0.62
NE	Nemaha	2013	↓ 0.03
SC	Rice	2013	↓ 4.55
NE	Morris	2013	↓ 3.43
NE	Clay	2013	↓ 4.81
NE	Doniphan	2013	↓ 2.07
SW	Stevens	2013	↓ 4.37
NE	Ottawa	2013	↓ 4.26
SW	Haskell	2013	↓ 2.54
SE	Bourbon	2013	↓ 0.97
SE	Allen	2013	↓ 4.86
SE	Neosho	2013	↓ 3.04
NC	Ellsworth	2013	↓ 2.91
NE	Brown	2013	↓ 3.44
NE	Marshall	2013	↓ 2.97
SE	Coffey	2013	↓ 2.27
SE	Anderson	2013	↑ 0.42
SE	Linn	2013	↑ 2.47
SW	Meade	2013	↓ 3.47
SC	Chase	2013	↓ 2.67
NE	Jackson	2013	↓ 0.39
NE	Wabaunsee	2013	↓ 1.82
SE	Montgomery	2014	↓ 5.41
SE	Cherokee	2014	↓ 3.63
SE	Labette	2014	↓ 4.26
SC	Sumner	2014	↓ 2.02

**Counties that experienced more than one percent in-migration or out-migration over the course of the program are denoted in darker shading.*

Introduction

The Rural Opportunity Zone (ROZ) Program was introduced by the Brownback Administration in 2012 as a policy solution to slow or reverse out-migration from rural communities. It includes two individual financial incentives: student loan repayment assistance and a five-year state income tax exemption. While both components of the program are funded through a single appropriation of $5 million, they maintain separate eligibility requirements. The program was initially targeted to 50 counties, although it has been expanded in recent years to include 77 counties. Current legislation would expand the program to 85 counties. Continual expansion of target counties dilutes the overall impact of the program.

Kansas is committed to working with rural communities to determine the most effective and valuable programs for rural revitalization. As a part of this commitment, the state must continually evaluate and improve its rural investment strategies to ensure that state dollars are being invested in what is best for rural communities. As the Kansas Department of Commerce works with Lt. Governor Rogers to build an Office of Rural Prosperity, this is an appropriate juncture to evaluate the effectiveness of ROZ in reducing out-migration from rural communities and creating a positive economic impact in rural areas. Data outlined in this report will show that the results are mixed, and frequently lackluster.

Tax policy is just one factor among many that impacts a business or family's decision to move to a community. This has been undeniably evident in Kansas throughout the last decade. With that in mind, ROZ cannot be evaluated in a vacuum. It is critical to understand what state investments in rural communities were eliminated or reduced as ROZ was implemented.

From 2012 to 2018, the state's historical investments in rural regions decreased and, in some cases, were eliminated. Many rural programs were replaced or reduced by the implementation of ROZ. **Table 2 (Pages 6-7)** depicts the decrease in both technical and financial assistance in programs that rural communities traditionally leveraged over decades to recruit, retain and grow businesses and jobs, as well as invest in quality of life enhancements.

Further, state investment in the Attraction Development Grant program, operated by the Kansas Department of Wildlife, Parks and Tourism has been sporadic. In 2015, none of these grants were awarded and only a few grants were made in subsequent years. Before FY 2015, the state invested in six to 12 grant projects per fiscal year.

The Kansas Arts Commission was zeroed out in FY 2011. In the past three fiscal years, the state has allocated less than $190,000. Rural communities had used the Attraction Development Grants and Arts Commission Grants to achieve meaningful investment in tourism, arts and culture. These grants allowed communities to leverage grants from other non-profits, from federal grants and from local funds.

The International Trade Division in the Department of Commerce was also abolished in 2012. This division provided international trade assistance to small rural companies exploring export marketing and offset expenses for international trade missions to open new markets for Kansas manufactured goods and commodities.

All of these programs benefitting rural communities have been reduced or eliminated since 2012. In their place, the ROZ program was created and implemented. This is relevant as policymakers evaluate whether a standalone tax incentive is more impactful than broad economic investments in growing rural communities.

Table 2: Alternate Kansas Rural Investment Programs Limited or Eliminated Because of ROZ

Program	Past Allocations	2017/2018 Allocation	Program Notes
Kansas Main Street Program	FY 2011-2012: **$280,058** - EDIF allocation Abolished in 2012	**$0.00**	**$24,535,134** in capital investment in 24 Kansas Main Street Communities = $88/$1 ROI in leveraged capital investment. This leverage represents private equity, commercial lenders and local revolving loan funds. **50** New Businesses created and **233** New Jobs Created
NetWork Kansas – Kansas Center for Entrepreneurship (established in 2004)	FY 2012: EDIF allocation for program operations: **$366,842**	EDIF allocation for program operations: **$296,554**	Staffing has been reduced NetWork Kansas is unable to reach all the communities who have applied to become an e-community
NetWork Kansas – Kansas Center for Entrepreneurship (Tax Credit Program used to fund and operate the NetWork Kansas State Revolving Loan Fund and local E-Community Revolving Loan Funds)	**$2,000,000** in tax credits raised **$2,666,667** in private funds	**$2,000,000** in tax credits raised **$1,999,953** in private funds. The tax law changes implemented in 2012 made these income tax credits more difficult to market. Fewer tax credits were used and thus reduced the private funds raised.	Since NetWork Kansas' inception, microloans made by NetWork Kansas to rural small businesses equal **$26,610,937**. These microloans loans have been leveraged by **$126,926,465** from commercial lenders and other local economic development partners.
Community Service Tax Credit Grant Program	FY 2014-2015: **$4,132,176**	FY 2017-2018: **$2,499,950 in tax credits**	Each Community Service Tax Credit grant is leveraged at the local level by private donations.

(provides tax credits to communities for health care improvements, historic renovations, recreational and educational enhancements, museum improvements, etc.)	**in tax credits** FY 2015-2016: **$4,130,000 in tax credits** FY 2016-2017: **$3,630,000 in tax credits**		2014-2015: **$6,765,630 funds leveraged** 2015-2016: **$6,291,201 funds leveraged** 2016-2017: **$5,942,294 funds leveraged** 2017-2018: **$3,782,291 funds leveraged**

Background

A. Rural Opportunity Zones Program Details

The Kansas Rural Opportunity Zones (ROZ) program was established in 2012 with the primary goal of reducing out-migration for rural counties in Kansas. The program started with 50 counties in which the population had declined at least 10 percent over the previous decade. Currently, 77 of the 105 counties in Kansas hold ROZ status. **Table 3 (Page 9)** contains the list of counties and the dates on which they became eligible for the program.

The program consists of two components: (1) a state income tax waiver and (2) student loan repayment assistance, both of which are available for up to five years. All but one of the 77 counties offer student loan repayment assistance. Chase County only offers the income tax waiver component. **Figure 1 (Page 10)** shows how many applicants have enrolled in the Student Loan Repayment Assistance component as of October 1, 2019.

Income Tax Waiver

The five-year state income tax waiver aims to relieve some of the costs associated with an interstate move, such as obtaining a new driver's license, registering and insuring an automobile, paying required deposits for rent and utilities and finding new health care providers, among other things. The tax waiver component of the ROZ program provides a waiver for 100 percent of the participant's state income tax liability for up to five years. To qualify for the state income tax waiver, the applicant must meet the following set of criteria:

- Establish domicile in a ROZ county on or after the date the county was included in the program;
- Lived outside the State of Kansas for at least five years prior to establishing domicile in the ROZ county;
- Earned less than $10,000 in Kansas-source income in each of the five years immediately prior to establishing domicile in the ROZ county; and
- Reside in the county from January 1st to December 31st of the year the waiver is requested,

Table 3: Participating ROZ Counties

FIPS	Name	Resolution Date	FIPS	Name	Resolution Date
20001	Allen	9/17/2013	20115	Marion	9/26/2011
20003	Anderson	4/21/2014	20117	Marshall	11/25/2013
20007	Barber	7/1/2011	20119	Meade	7/1/2016
20011	Bourbon	9/16/2013	20123	Mitchell	7/1/2011
20013	Brown	11/4/2013	20125	Montgomery	6/9/2014
20017	Chase		20127	Morris	8/13/2013
20019	Chautauqua	10/31/2011	20129	Morton	6/27/2011
20021	Cherokee	2/9/2015	20131	Nemaha	7/1/2013
20023	Cheyenne	7/29/2011	20133	Neosho	10/4/2013
20025	Clark	7/8/2011	20135	Ness	6/27/2011
20027	Clay	8/19/2013	20137	Norton	7/25/2011
20029	Cloud	8/29/2011	20141	Osborne	9/23/2013
20031	Coffey	12/23/2013	20143	Ottawa	8/26/2013
20033	Comanche	8/20/2013	20145	Pawnee	1/23/2012
20039	Decatur	7/19/2011	20147	Phillips	9/6/2011
20043	Doniphan	8/19/2013	20151	Pratt	6/27/2011
20047	Edwards	7/18/2011	20153	Rawlins	8/31/2011
20049	Elk	7/30/2012	20157	Republic	12/17/2012
20053	Ellsworth	10/14/2013	20159	Rice	8/5/2013
20063	Gove	12/12/2011	20163	Rooks	6/7/2011
20065	Graham	6/21/2011	20165	Rush	8/8/2011
20067	Grant	6/18/2013	20167	Russell	6/6/2011
20069	Gray	6/28/2013	20171	Scott	6/7/2011
20071	Greeley	6/13/2011	20179	Sheridan	10/21/2013
20073	Greenwood	7/25/2011	20181	Sherman	7/12/2011
20075	Hamilton	6/21/2011	20183	Smith	7/18/2011
20077	Harper	7/11/2011	20185	Stafford	7/25/2011
20081	Haskell	9/9/2013	20187	Stanton	4/1/2013
20083	Hodgeman	6/17/2011	20189	Stevens	8/19/2013
20085	Jackson	4/2/2018	20191	Sumner	8/22/2016
20089	Jewell	10/17/2011	20193	Thomas	7/18/2011
20093	Kearny	6/27/2011	20195	Trego	6/20/2011
20095	Kingman	5/31/2011	20197	Wabaunsee	5/7/2018
20097	Kiowa	8/20/2012	20199	Wallace	6/14/2011
20099	Labette	2/16/2015	20201	Washington	7/7/2014
20101	Lane	6/6/2011	20203	Wichita	11/4/2013
20105	Lincoln	8/22/2011	20205	Wilson	12/19/2011
20107	Linn	4/7/2014	20207	Woodson	6/16/2011
20109	Logan	2/21/2017			

Student Loan Repayment Assistance

The student loan repayment assistance component of the program aims to help rural businesses and communities recruit people with higher educations and a broader range of skills to fill positions within the area. By partnering with business and county sponsors, Kansas offers eligible individuals up to $3,000 per year, for five years to put toward their student loans. If an individual's loan balance is less than $15,000, she/he receives 20 percent of the loan balance paid each year for 5 years. For example, a person with $10,000 in student loan debt would receive $2,000 per year, for five years. To qualify for student loan repayment assistance, an applicant must meet the following criteria:

- Establish domicile in a ROZ county after July 1, 2011, on/after the date on which the county opted in to the student loan program;
- Hold an associate's, bachelor's, or postgraduate degree prior to moving to a ROZ county;
- Have an outstanding student loan balance in applicant's name;
- Be able to provide proof of residency at current and previous addresses, proof of degree, proof of student loan balance with distribution dates, and a Kansas Tax Clearance Certificate;
- Have a county or employer sponsor. *Note: An applicant must have a sponsor to receive funding from the state.*

Figure 1: ROZ Applicants To-Date

Student Loan Applicants

Total applications received all time:	3854
Total participated all time:	1724
Currently active:	517
Completed all 5 years:	267
Paid off loans early and withdrew:	560
Disqualified:	380
Waiting for funding:	161

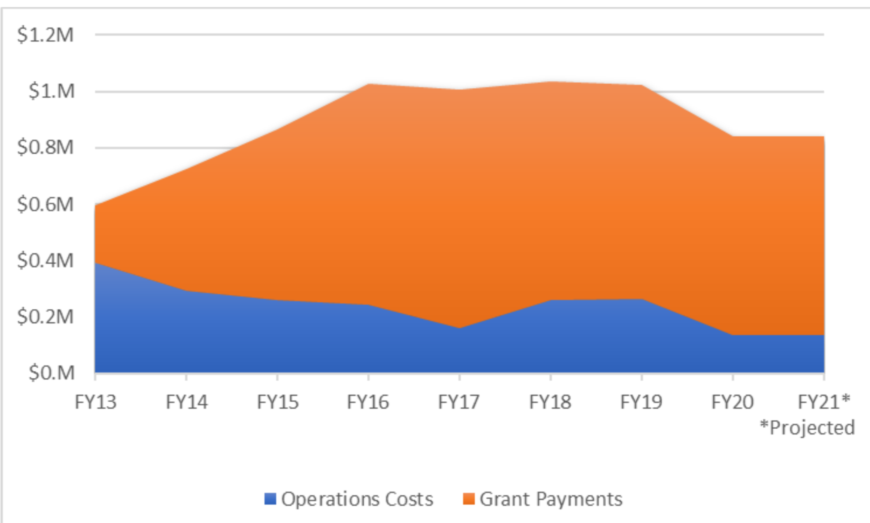
Tax Credit Applicants

Tax Year	Filers	Credit Allowed
2012	98	$236,660
2013	253	$575,331
2014	335	$968,896
2015	419	$1,289,433
2016	494	$1,344,693
2017	533	$1,727,904
2018	500	$1,924,660
	Total:	**$8,067,523**

Program Spending

Program spending has largely kept pace with the growing list of counties receiving ROZ status. **Figure 2 (Page 11)** displays the amount of money the state spends on the student loan component of the Rural Opportunity Zone program each year. This graph includes projections for Fiscal Years 2020 and 2021. The grant allotment (amount in yellow in Figure 2) represents half of what participants receive as the county, or employer, sponsors provide the other half of the financial benefit. The average annual payment to participants, including state and sponsor contributions, is approximately $2,700. The student loan repayment assistance element of the ROZ program has been funded at $1,200,000 each fiscal year through, FY 2019. **Table 4 (Page 17)** illustrates spending for the income tax component of the program. *Note: For FY 2020, the ROZ allocation has been reduced $250,000 to fund the reestablishment of the Kansas Main Street Program.*

Figure 2: State Spending on Student Loan Assistance, by Fiscal Year



Legislative History

The initial legislation, Senate Bill 198, designated 50 counties in Kansas as “rural opportunity zones.” As part of SB 198, certain out-of-state taxpayers who relocated to these counties and met certain criteria were eligible to receive an income tax credit for 100 percent of their state income tax liability for tax years 2012 through 2016. Senate Bill 198 became law during the 2011 Legislative Session.

During the 2013 Legislative Session, House Bill 2059 was passed and signed into law. Section nine of HB 2059 amended K.S.A. 2012 Supp. 74-50,222, to give 23 additional counties the ROZ designation. Taxpayers who relocated to these counties and met certain criteria were provided an income tax credit, which was available for tax years 2013 through 2016. Four more counties joined the list following the passage of House Bill 2643 during the 2014 Legislative Session. Taxpayers who relocated to these counties and met certain criteria could request an income tax credit for tax years 2014 through 2016.

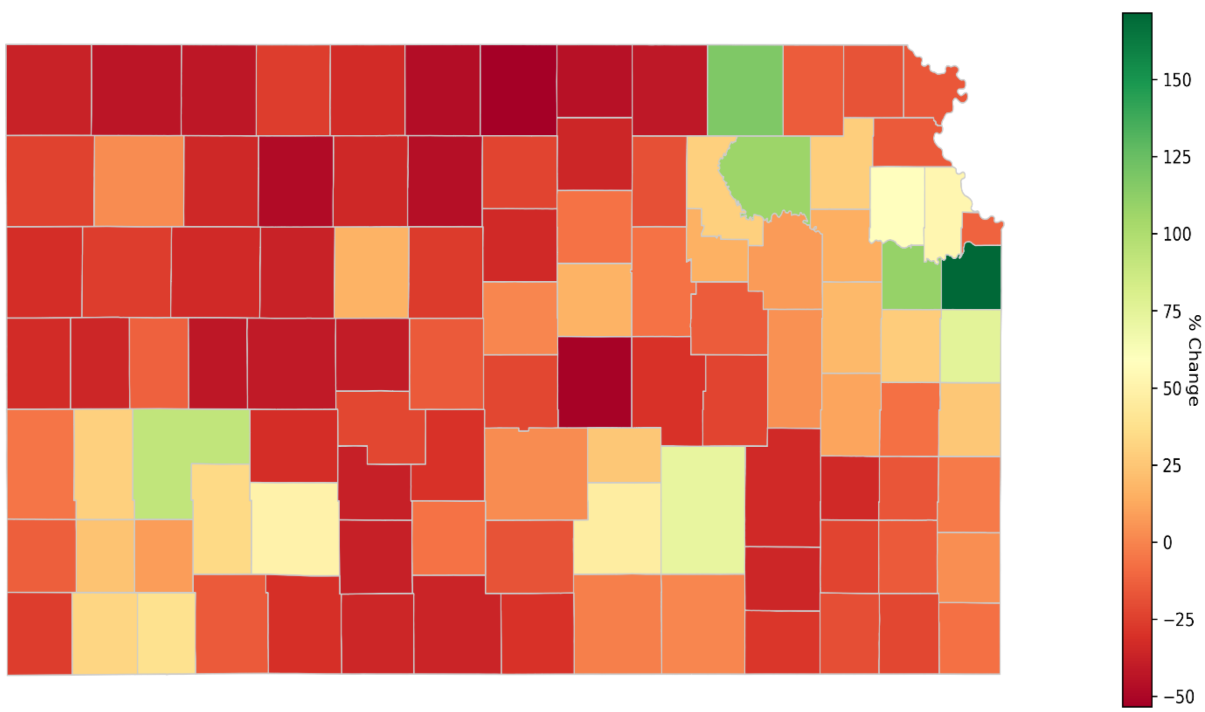
Section 27 of House Bill 2109, which became law during the 2015 Legislative Session, amended K.S.A. 2014 79-32,267, to extend the income tax credit through tax year 2021. Presently, 77 of the state’s 105 counties hold the ROZ designation. Finally, Senate Bill 125 extends the eligibility period for both components of the program, and Senate Bill 135 adds 8 counties to the list of eligible ROZ counties. In the 2019 Legislative Session both bills were referred to the Senate Committee on Taxation.

B. Overall Population Trends in Kansas

In the following discussion of population patterns, we use four categories, based on population density, to refer to different types of counties in Kansas: rural, densely-settled rural, semi-urban and urban. The rural group includes counties with fewer than 19.9 people per square mile (ppsm), densely-settled rural counties have a population density between 20.0 and 39.9 ppsm, semi-urban counties are counties in which the population density is between 40.0 and 149.9 ppsm and urban counties have a population density greater than 150.0 ppsm.

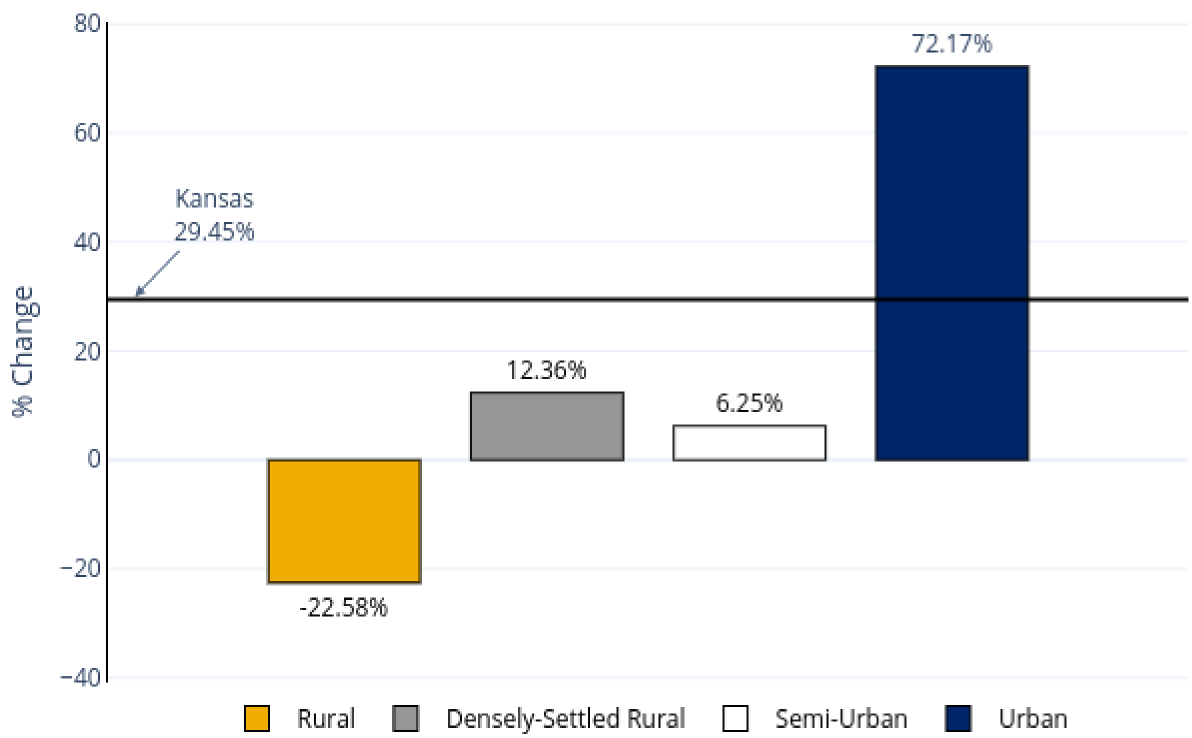
From 1970 to 2018, the Kansas population increased by 29.45 percent, from 2,249,071 to 2,911,505. **Figure 3** (**Below**) illustrates the county-level change in population over this period. As shown, there are dramatically different population change patterns between urban and rural counties. Between 1970 and 2018, population growth was highest in urban counties. The population increased by 72.2 percent, from 962,262 to 1,656,773.

Figure 3: Change in Kansas Population from 1970 to 2018



Semi-urban population increased by 6.3 percent, from 427,728 to 454,465. Densely-settled rural counties experienced a net increase of 12.4 percent between 1970 and 2018, from 386,853 to 434,671; however, this group experienced its peak of 496,189 in 1983, meaning the population declined, on average, between 1983 and 2018. The population gains in these counties were offset by population decreases in the less densely populated counties in the state. Rural county population decreased by 22.2 percent over this period, from 365,396 to 297,531. **Figure 4** shows the differences in population growth from 1970 to 2018 for these groups. As you can see, **Figure 4** reveals the rural group was the only group to lose population over this period. The horizontal line in **Figure 4** indicates the change in population for the entire state.

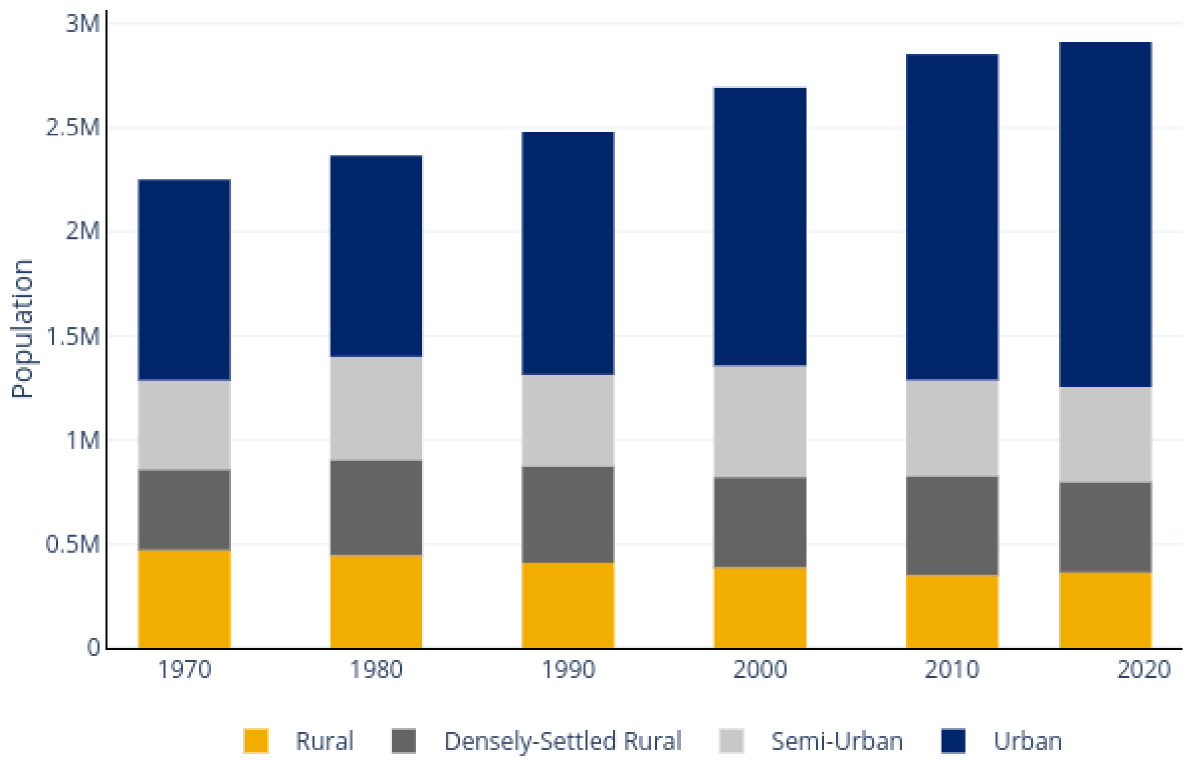
Figure 4: Kansas Population Change from 1970 to 2018, by County Population Density



Source: U.S. Census Bureau

Between each successive 10-year interval from 1970 to 2018, the Kansas population increased anywhere from 4.1 percent (2000 to 2018) to 8.6 percent (1990 to 2000). Positive population growth in the state largely occurred in urban counties, where county populations grew during each time interval. Conversely, in rural counties, there were population declines across all intervals except from 2010 to 2018, when the population in rural counties grew slightly. Densely-settled rural and semi-urban counties fluctuated between positive and negative growth over this time period. **Figure 5** breaks down the population by county type over this time period. As you can see in **Figure 5**, while the population is growing over this entire period, the population is becoming more concentrated in urban counties

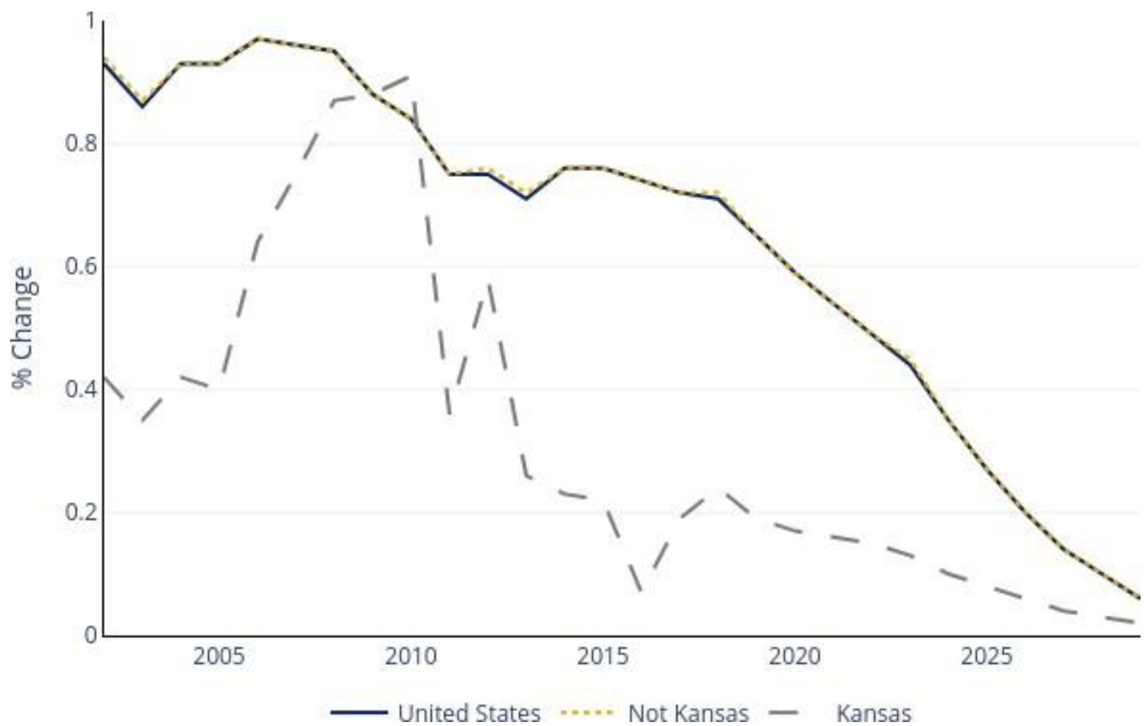
Figure 5: Kansas Population from 1970 to 2018, by County Population Density



Source: U.S. Census Bureau

Figure 6 compares historic and projected population changes for Kansas to the rest of the United States. The “not Kansas” group equals the population of the United States, minus the population of Kansas for a given year. With the exception of 2010, the other states have, on average, outpaced Kansas in terms of year-over-year population growth since 2002.

Figure 6: Historic and Projected Population Change (2002 - 2029)



Source: EMSI 2019.2

Data and Methodology

A. Data Sources

Administrative Revenue Data

The Kansas Department of Revenue (KDOR) provided data on the income tax waiver component of the Rural Opportunity Zones program. **Table 4 (Below)** shows the total tax credits, filers and associated income from 2012 to 2017. While the average annual income is up 44 percent from 2012, the number of new filers has decreased over the last three years. The program only added 30 filers from 2016 to 2017. The online attachment contains county-level data for this component of the ROZ program, but a significant amount of information has been redacted as the KDOR is prohibited from disclosing information on counties in which there were fewer than five filers.

The tax credit represents forgone income for the state. We apply the income multiplier described in the Methodology section to this number, as it represents income the participant received due to the program. State income tax waiver participants pay taxes all year and receive a refund upon filing their taxes. They may or may not incur taxes on this refund at the federal level; this depends on whether they itemize their deductions. For the purposes of this paper, we conservatively assume everyone pays taxes on their Kansas refund check (i.e., everyone itemizes); however, the recent increases in the standard deductions make it less likely that tax filers will itemize in the future.

Table 4: Income Tax Waiver Claims

Tax Year	FAGI	KAGI	Taxable Income	Tax Credit	Filers
2012	$6,070,770	$6,049,259	$4,940,518	$236,660	98
2013	$17,922,379	$17,257,045	$14,076,540	$575,331	253
2014	$29,579,996	$28,815,881	$24,276,035	$968,896	335
2015	$36,078,720	$37,626,094	$32,258,217	$1,289,433	419
2016	$37,489,461	$40,423,206	$34,337,233	$1,344,639	494
2017	$46,556,329	$46,316,280	$39,636,109	$1,727,904	533
Total	$173,697,655	$176,487,765	$149,524,652	$6,142,863	

Source: Kansas Department of Revenue; FAGI – Federal Adjusted Gross Income; KAGI – Kansas Adjusted Gross income.

Participant Surveys

The Kansas Department of Commerce administered a survey to participants receiving student loan repayment assistance. Participants completed the survey via Survey Monkey with a 97 percent response rate. The survey included questions related to basic demographic information, such as age, education level, and marital status; debt and income levels; and the program's impact on the decision to relocate to rural Kansas. **Table 5** contains descriptive statistics for the sample of individuals who completed the survey. As you can see in the table, over 90 percent of the individuals are under 40, and the majority of participants hold a bachelor's degree or higher. Almost 75 percent of the individuals receiving student loan repayment assistance are married, and over 60 percent have at least one child under the age of 18. Additionally, over 86 percent reported full-time employment status.

Out of the 522 participants, 155 moved to Kansas from another state. **Figure 7** shows the states in which the student loan repayment participants lived prior to applying for the ROZ program. Unsurprisingly, Kansas has the largest representation, followed by Nebraska, Missouri, Colorado, Oklahoma, and Texas. Most of the "out-of-state" participants have lived in Kansas at some other point in time. A clear majority of individuals receiving student loan repayment assistance indicated they would have relocated even without the program.

Figure 7: Student Loan Repayment Program Participants as Of March 2019, by Previous State

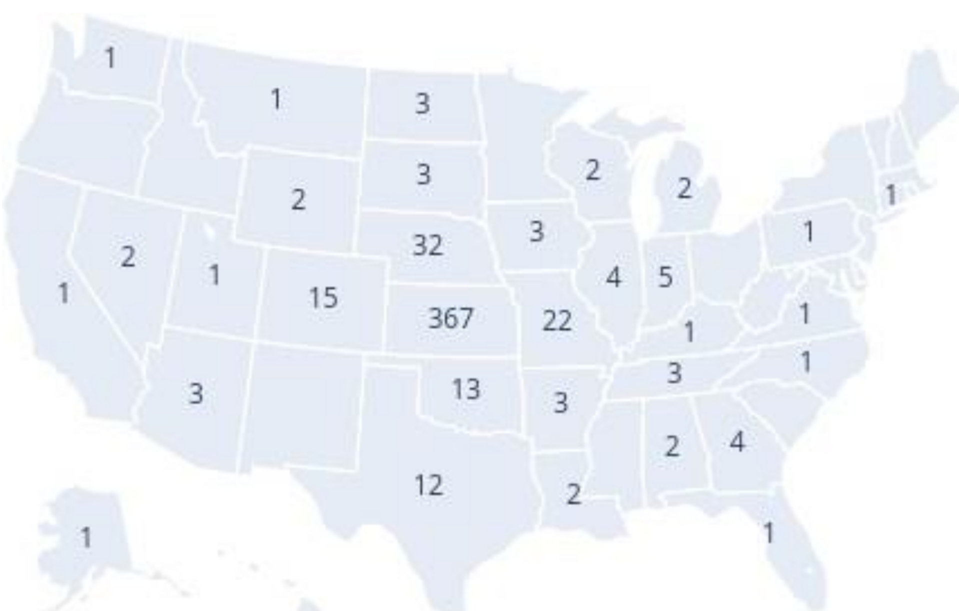


Figure 8 shows the distribution of survey takers by county. The majority of counties in Kansas (shown in yellow) possess ROZ status. Notably, 13 of the 77 ROZ counties did not have any representation in the student loan repayment component of the program. The counties of Phillips, Nemaha, and Kearny counties had more student loan repayment participants than most of the other counties, by an order of magnitude.

Figure 8: Student Loan Repayment Program Participants as Of March 2019, by ROZ County

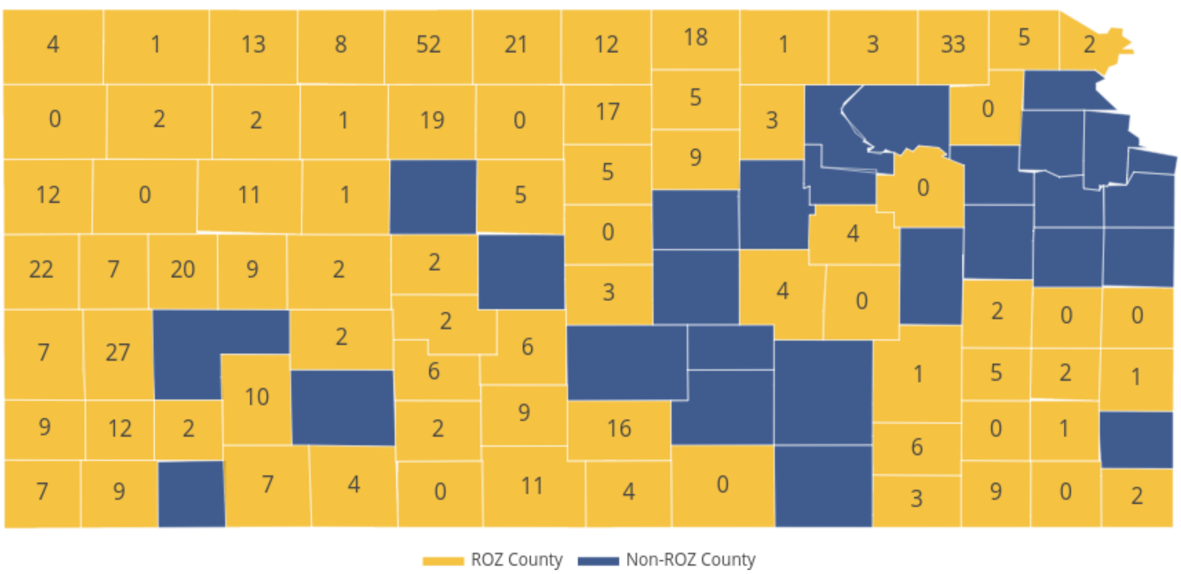


Table 5: Descriptive Statistics for Student Loan Assistance Recipients, As of March 2019

Description	Number	Percent
Age		
21 - 30	269	51.53
31 - 40	219	41.95
41 - 50	23	4.41
51 - 60	11	2.11
Education Level		
Associate’s	45	8.62
Bachelor’s	312	59.77
Doctorate	51	9.77
Master’s	107	20.5
Technical	7	1.34
Marital Status		
Divorced	16	3.07
Married	391	74.9
Partner	4	0.77
Single	109	20.88
Other	2	0.38
Children		
0	189	36.21
1	110	20.69
2	133	25.48
3	68	13.41
4+	22	4.21
Employment Status		
Self Employed	32	6.13
Full-Time	451	86.4
Part-Time	23	4.41
Home Maker	14	2.68
Seeking Employment	1	0.19
Not Seeking Employment	1	0.19
Living Situation		
Home Owner	368	70.5
Employer-Provided Housing	19	3.64
Rent Free w/ Relative or Friend	17	3.26
Renter	110	21.07
Other	8	1.53
Moved from Another State		
Yes	155	29.69
No	367	70.31

B. Economic Analysis Methodology

Accounting for Always-Movers

In most randomized controlled trials, particularly in economics, compliance with the initial random assignment is imperfect. Some individuals never receive treatment, even if they are assigned to the treatment group, and some individuals need the treatment so badly they will always get treated, irrespective of whether they are assigned to the treatment group or to the control group. The treatment evaluation literature refers to the latter group as "always-takers." In the case of the ROZ program, we do not have an experiment per se (i.e., where participation in the program is randomly assigned), but there may be a subset of participants who always relocate to an eligible county, regardless of whether financial incentives exist. We refer to these individuals as "always-movers," and, while there is some degree of heterogeneity within this group, moving closer to family tends to be the primary incentive to relocate to a rural county.

As a result, the always-movers represent a base level of income that would have entered the Kansas economy even without the ROZ financial incentives. Therefore, including this income in the analysis would overstate the impact of the program. In fact, the clear majority of individuals receiving student loan repayment assistance indicated they would have relocated even without the program. We do not have this same information for individuals receiving income tax waivers, so we assume 100 percent of the participants would have relocated anyway. Although we exclude the participants' base pay from our analysis, we account for the financial benefits they receive through the program as this is income they would not have received otherwise. In the analysis that follows, we only consider the impact of funds received from Rural Opportunity Zones sources.

The Income Multiplier

Economists still use economic multipliers to translate a known, or assumed, direct effect into an estimated total impact, which equals the direct effect plus an indirect effect. Put another way, economic multipliers provide some insight into the sign (i.e., positive or negative) and potential magnitude of the impact expected from a change in a given economic activity. In the case of the ROZ program, we used a set of income multipliers to examine the extent to which payments to ROZ program participants result in an increase in consumer spending and additional income in the Kansas economy.

The income multipliers used in this paper takes the following form:

$$\text{multiplier}_t = \frac{1}{1 - v(1-\tau)(b - m_t)},$$

where v is the fraction of value added to intermediate goods by local producers, τ is the tax rate (i.e., the marginal tax rate or the rate at which the additional income will be taxed), b is the marginal propensity to consume, and m_t is the marginal propensity to import in period t. To estimate the impact of the program, we take the product of ROZ spending (state sources only) and the income multiplier for each year. We chose to index the marginal propensity to import by t to show the increasing problem of imports over time. There is a risk that fewer and fewer dollars will remain in the local economy as people continue to increase the importation of goods into Kansas. The multiplier is increasing in the marginal propensity to consume, b, and the fraction of value added by local producers, v, and decreasing in the marginal tax rate, τ, and the marginal propensity to import, m_t.

Limitations: Economic Leakages

Leakages refer to capital that exits an economy through non-consumption uses of income. Non-consumption uses of income include taxes, savings, and imports.

Taxes: Participants do not keep 100 percent of the funds they receive from the ROZ program as they must pay taxes on this income. To select an appropriate number for the tax rate, this report takes a weighted average of the median household income by county using the American Community Survey five-year estimates, and the appropriate state and federal marginal tax rates. We assume a constant distribution of household income over the length of the program, and the rates we use in the model most likely represent upper bounds on the true rates as we have not accounted for personal exemptions or standard deductions.

Consumption: Contrary to many introductory models, economic agents rarely spend 100 percent of their income. The amount individual savings represent another "economic leakage" as this is money that does not enter the local economy—at least in the short run. This report estimates a marginal propensity to consume of one-third, which is in-line with other empirical studies. Accordingly, we set the marginal propensity to consume equal to one-third. We used a common marginal propensity to consume to simplify the analysis; however, there are a number of studies that show saving and consumption vary by wealth and age.

Imports: Imports are an important part of the model as they represent actual dollars leaving the economy. We used the average annual ratio of e-commerce retail sales to total retail sales, as reported by the U.S. Census Bureau, as a proxy for the marginal propensity to import. We used data on industry purchases to estimate the value added by local producers (i.e., the proportion of intermediate goods not being imported into the state). Imports are one of the primary risks associated with government transfers in an open economy. They introduce a risk that the money does not stay in the economy.

Results

Impact of ROZ on Rural Repopulation

As mentioned, the primary goal of the ROZ program was to reduce or reverse out-migration in rural communities. The data illustrates that the ROZ program did not successfully slow or reverse rural depopulation in Kansas. **Table 1 (Page 3) indicates that out-migration continued in 91 percent of ROZ counties.** Of the seven counties that experienced a population increase over the course of the program, only **two** counties saw a population increase of more than one percent. These results indicate sustained population loss in a clear majority of ROZ counties, signaling a lack of program efficacy.

8 in **10** ROZ participants indicated that would have moved to their county of residence **regardless** of program benefits.

Further, data shows that the ROZ program did little to influence relocation decisions. **According to a survey of ROZ program participants, ~83 percent of participants indicated that they would have moved to their county of residence regardless of the income tax waiver or student loan benefits.** Of the participants who moved to Kansas from out of state, ~60 percent indicated that they already had plans to move to Kansas before learning about ROZ. Collectively, 70 percent of all respondents indicated that the ROZ program was not the reason they chose to remain in the state.

Number of Total ROZ Counties as of 2019	Number of ROZ Counties with sustained population loss from ROZ implementation - 2018	Number of ROZ Counties with more than 1% population growth
77	↓ 70 (91%)	↑ Two (2.6%)

Source: U.S. Census, see Table 1

1. **Which ROZ benefits do you or have you received?**
    a. Student Loan Repayment Assistance – 99.81%
    b. 100% Kansas Income Tax Credit – 7.89%
    **Note: some respondents received both benefits*
2. **Did you move to a ROZ county from another state?**
    a. Yes – 29.89 %
    b. No – 70.11%
3. **If you answered yes to previous question, did you have plans to move to Kansas?**
    a. Yes – 52.74%
    b. No – 47.26%
4. **If you answered yes to the previous question, did you already have plans to move to your current county before learning about the ROZ program?**
    a. Yes – 60.64%
    b. No – 39.36%
5. **If you answered yes to the previous question, did the ROZ program cause you to change the timing of your move?**
    a. Yes – I chose to move to the county sooner - 10.98%
    b. Yes – I chose to delay my move – 0.59%
    c. No – I did not change the timing of my move because of the ROZ program – 88.43%
6. **Would you have moved to your current county of residence without the income tax or student loan benefits?**
    a. Yes – 83.83%
    b. No – 16.17%
7. **Did you choose to remain in Kansas because of the income tax or student loan benefit (i.e. Were you thinking about leaving the state before you learned about the ROZ program)?**
    a. Yes – 30.34%
    b. No – 69.36%

Income Tax Waiver and Student Loan Repayment Economic Impact

For both components of the ROZ program, the state is most likely only generating a marginal amount of net economic activity. **Tables 6** and **7** contain the results of the economic impact analysis. For the income tax waiver, the analysis estimated an **eight to ten percent increase** in additional statewide economic activity. **However, these estimates should be viewed cautiously, as they rely on a variety of significant assumptions concerning taxes, savings, and imports.** The economic multipliers in **Table 7** indicate the state is generating even less of an impact through student loan payments. Unlike the income tax waiver component, county or employer sponsors match the state's contributions, which means the impact is twice as high as it would have been without the matching funds. It is important to note that ROZ has a relatively miniscule return on investment (ROI) when compared to other rural investment programs like the Kansas Main Street program. *Note in 2018, a total of 765 individuals applied for the income tax waiver.*

Table 6: Estimated Income Tax Waiver Impact

Tax Year	Tax Credits	Filers	Multiplier[a]	Impact[b]	Impact per Filer
2012	$236,660	98	1.10	$260,326	$2,656
2013	$575,331	253	1.09	$627,111	$2,479
2014	$968,896	335	1.09	$1,056,097	$3,153
2015	$1,289,433	419	1.09	$1,405,482	$3,354
2016	$1,344,639	494	1.09	$1,465,657	$2,966
2017	$1,727,904	533	1.08	$1,866,136	$3,501
2018	$1,924,660	500	1.08	$2,078,632	$4,157

Table 7: Estimated Student Loan Repayment Impact

Fiscal Year	State Contribution	County/ Employer Match	Multiplier[b]	Impact[c]
FY13	$200,289	$200,289	1.10	$440,636
FY14	$431,414	$431,414	1.09	$940,483
FY15	$606,395	$606,395	1.09	$1,321,941
FY16	$782,833	$782,833	1.09	$1,706,576
FY17	$843,468	$843,468	1.09	$1,838,760
FY18	$773,362	$773,362	1.08	$1,670,462
FY19	$708,439	$708,439	1.08	$1,530,228
FY20[a]	$708,439	$708,439	1.08	$1,530,228
FY21[a]	$708,439	$708,439	1.07	$1,516,059

[a]The multiplier assumes a 35.2 percent marginal tax rate and a marginal propensity to consume equal to one third. The marginal propensity to import varies by year and represents the four-quarter average of the ratio of e-commerce retail sales to total retail sales as reported by the U.S. Census Bureau.
[b]The impact is the product of the multiplier and the tax credits.

Conclusions

The primary goal of the Rural Opportunity Zones program was to reduce or reverse out-migration from rural communities in Kansas. To date, the ROZ program has not successfully and independently influenced depopulation in rural Kansas. Out-migration has continued in most ROZ counties. Further, the survey data show a clear majority of participants would have moved to a ROZ county even without the financial incentives. Even for counties with participants for whom the financial incentives were the primary factor for relocation, the numbers are small enough to constitute a rounding error. Further, ROZ does not provide a ROI that warrants continuation of the statewide program. The state should shift investment to historically successful community-based rural development programs that have a significantly higher return on state dollars.

Limitations and Observations

Economic multipliers represent useful tools when data limitations prevent researchers from establishing clear causal relationships between economic stimuli and behavioral responses; however, this type of analysis relies on several assumptions, such as the availability of consumer goods and the multiplier period, and these assumptions place limitations on the findings. Given the current data, we have no way to tell whether expenditures changed because of the change in household income.

The survey data provides some evidence of the program's impact on the population; however, this data is self-reported. Specifically, establishing the previous residency of an applicant prior to moving to a ROZ county is challenging and either relies on self-reporting or significant paperwork to provide evidence of previous residence. **Many of the student loan repayment assistance recipients represent college graduates who never changed their permanent domicile, yet due to mismanagement early in the program, these individuals were approved to receive ROZ payments.** As a result, some individuals may have overstated the importance of the program to ensure it had enough support to continue. In these cases, the program's financial incentives were merely payments for doing something they would have done regardless, not actual behavior incentives. Some of the mismanagement occurred because of previous program managers allowing people enroll in the program who were not eligible while not allowing others who were eligible. There were also occasions of counties reporting that they were receiving incorrect information from the previous administrators.

The student loan repayment assistance waiting list represents a significant challenge for the program. Currently, limitations to program expansion arise at the county level (i.e., not enough matching funds); however, if the legislature votes to designate additional counties as ROZ counties, the state may become the limiting factor.

Recommendations

"Solutions are best when they come from rural communities. Residents know best what can make their town better, and they have a better definition of what it means to prosper than some demographer or economist can come up with."
Secretary of Commerce David Toland, February 2019

The Kansas Rural Opportunity Zones (ROZ) program was structured as a state-run individual incentive program designed to slow or reverse rural out-migration in rural Kansas communities. The data in this report illustrates that the results of this program are unfavorable. Rural out-migration continued in most ROZ counties, and the economic impact of the program is marginal when compared to the other rural investment programs that were diminished or eliminated in lieu of ROZ investment (**See Figure 9, page 30**).

Kansas should be responsive to the findings in this report about the program's effectiveness as a central pillar in the state's rural revitalization strategy. The ROZ program, while well intentioned, is not a cost-effective use of state funding, especially considering the efficacy of other Department of Commerce programs. Instead, Kansas should shift its statewide investment strategy away from individual incentive programs, like ROZ, and partner with local communities to reinvest in proven historically valuable community and business development initiatives like the Kansas Main Street program. Communities who have found individual incentive programs helpful in attracting new residents should be encouraged to develop their own, tailored programs free of state restrictions.

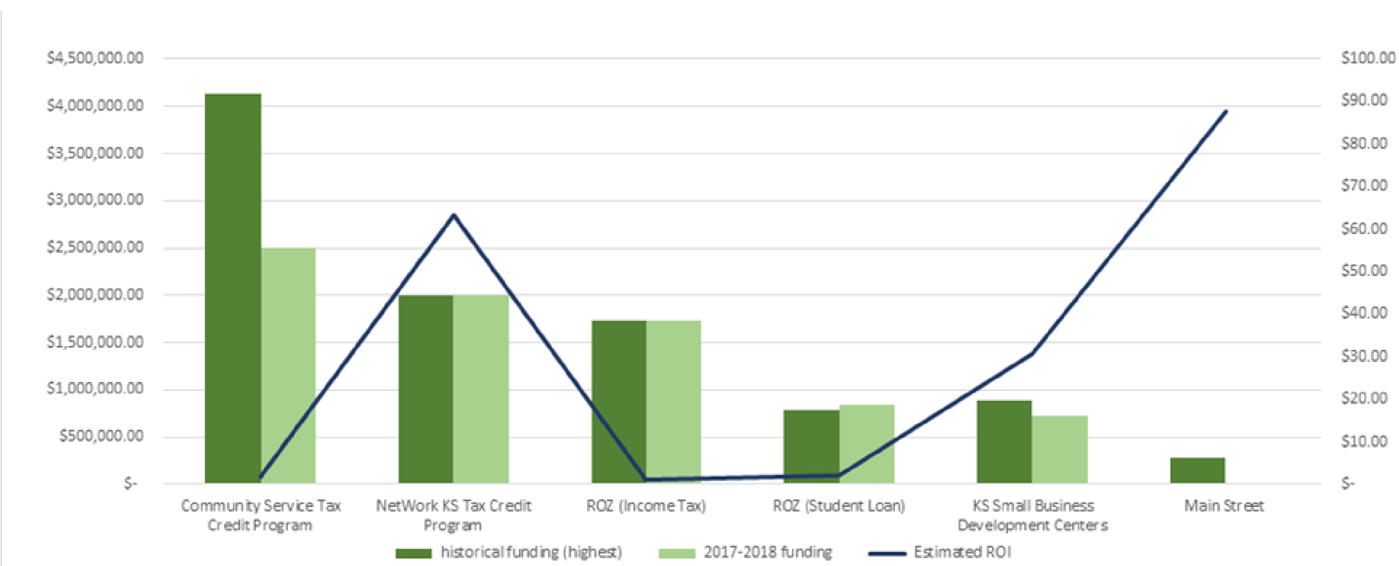
As previously mentioned, this report **recommends that Kansas should restructure the ROZ program** and **engage with rural communities to develop locally-driven and tailored investment alternatives that are evidence based and meet community needs.** One-size-fits-all relocation incentive initiatives like ROZ have proven ineffective for rural communities. Commerce should look at decentralizing individual incentive programs and, instead, partner with rural communities to create locally tailored and administered solutions that can leverage local business interest and eliminate burdensome eligibility restrictions or administrative delays. **For jurisdictions who have seen local benefit from rural relocation programs, Commerce should help develop incentive programs tailored to their community's needs.**

Kansas should engage with rural communities to develop investment alternatives that shift statewide investment from individual incentive programs like ROZ to proven locally-driven investment alternatives that meet community needs.

Given the findings of this report, policymakers **should work with rural stakeholders to restructure the ROZ program through locally-sourced and data-driven investment alternatives.** These alternate investments should be informed by the intensive engagement with rural communities done by the Department of Commerce and should complement the findings of the Framework for Growth strategic plan report set to be published in summer 2020. Further engagement could focus specifically on incentive programs and feature focus groups with existing beneficiaries, meetings with business stakeholders, and surveys of rural communities.

As mentioned, Kansas diminished or eliminated several historically successful Department of Commerce programs to fund the ROZ initiative (**See Table 2**). These programs were vital in improving the quality of life for rural communities and attracting business investment to rural Kansas, promoting economic revitalization. **Figure 9** shows the return on investment for community-based investment programs as compared to ROZ.

Figure 9: Funding and Estimated Return on Investment for Department of Commerce Programs



The following are some examples of historically successful investment alternatives that policymakers could consider:

Expanding the Kansas Main Street Program.

Main Street, which was recently restored during the Kelly Administration, helps communities revitalize historic downtown areas and generate business investment. Main Street communities throughout Kansas have previously engineered over $600 million in redevelopment, including the opening and expanding of over 3,800 small businesses and creating over 8,600 jobs. A 2012 report found that Kansas Main Street program returned $88 in capital investment for every $1 dollar invested. Additional investment should also be paired with a focus on arts and culture as a vehicle of community development, leveraging existing arts-focused programs administered by the Department of Commerce.

Restoring funding for existing programs like NetWork Kansas.

NetWork Kansas, originally established in 2004 as the Kansas Center for Entrepreneurship, connects entrepreneurs and small business owners with education and economic resources for business development. The staffing levels of this program have been reduced, meaning the program is unable to reach all interested communities. Since NetWork Kansas' inception, microloans made by NetWork Kansas to rural small businesses equal $26,610.937. These microloans loans have been leveraged by $126,926,465 from commercial lenders and other local economic development partners.

Investing in rural-focused business incentive programs through Economic Development Initiative Funds.

Kansas should consider incentive programs designed to attract businesses to relocate, locate or remain in rural areas. These additional (or special) incentives to businesses that move to, or startup in rural areas could promote economic development. In turn, economic development in rural communities can incentivize rural relocation for employment opportunities and improve quality of life for those living in rural communities.

For jurisdictions who have seen local benefit from rural relocation programs, the Department of Commerce could help develop incentive programs tailored their community's unique needs.

For many counties in Kansas, the current ROZ program did not effectively meet their needs. Statewide restrictions on program eligibility and long waiting lists fueled by administrative delays hampered the program's appeal. A significant number of counties refused to provide a county-level match for the student loan repayment assistance portion of the program, reducing the program's impact in some communities.

One-size-fits-all relocation incentive initiatives like ROZ have proven ineffective for rural communities. Department of Commerce should consider decentralizing individual incentive programs and, instead, partner with rural communities to create locally tailored and administered solutions that can leverage local business interest and eliminate burdensome eligibility restrictions or administrative delays. **Local jurisdictions which see benefit from these programs can partner with community foundations and local employers to develop locally-tailored and administered incentive packages for rural relocation. These packages can be responsive to community employment needs and provide tax credits, cash incentives, and remote workforce incentives.** For example, some communities reported that tax incentives may be more beneficial than student loan repayment assistance. Locally controlled programs can help jurisdictions choose what incentives are most attractive for their communities.

Remote workforce programs like the Tulsa Remote program in Tulsa, Oklahoma can be an innovative model for rural Kansas. Rural communities can work with the Department of Commerce and local stakeholders to build attractive tele-work incentives for high-demand jobs in their jurisdictions.

Along with the Department of Commerce, the newly created Kansas Office of Rural Prosperity can support rural communities seeking to develop these local incentive programs. They can provide technical assistance for communities seeking to build a community foundation, connect communities to grant-writing assistance, and provide educational resources. By partnering with rural counties and fostering locally-tailored programs, Kansas can be more responsive to the needs of rural Kansans.

RURAL OPPORTUNITY ZONE CREDIT

Kansas Department of Revenue

Breakdown of the Rural Opportunity Zone Credit by County

		2012		2013		2014		2015		2016		2017	
County		Number of Filers	Tax Expenditure	Number of Filers	Tax Expenditure	Number of Filers	Tax Expenditure	Number of Filers	Tax Expenditure	Number of Filers	Tax Expenditure	Number of Filers	Tax Expenditure
Allen	added for TY 2013			*CONFIDENTIAL		*CONFIDENTIAL		10	$38,598	12	$48,350	11	$41,233
Anderson	added for TY 2013							*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Barber	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Bourbon	added for TY 2013			*CONFIDENTIAL		5	$9,875	*CONFIDENTIAL		5	$12,700	11	$29,039
Brown	added for TY 2013					*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Chautauqua	original ROZ county												
Chase	added for TY 2013												
Cherokee	added for TY 2014									*CONFIDENTIAL			*CONFIDENTIAL
Cheyenne	original ROZ county	*CONFIDENTIAL		5	$9,035	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		9	$18,305
Clark	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		5	$20,584	6	$17,518	9	$25,839	8	$32,835
Clay	added for TY 2013			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		6	$16,591	6	$20,632
Cloud	original ROZ county	*CONFIDENTIAL		7	$16,780	6	$9,985	7	$15,276	7	$13,999	5	$13,823
Coffey	added for TY 2013					5	$30,075	10	$54,653	12	$74,110	25	$144,132
Comanche	original ROZ county												*CONFIDENTIAL*
Decatur	original ROZ county	*CONFIDENTIAL		6	$12,035	11	$19,878	7	$19,360	11	$12,981	8	$8,963
Doniphan	added for TY 2013					*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Edwards	original ROZ county			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Elk	original ROZ county			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Ellsworth	added for TY 2013							*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Gove	original ROZ county	*CONFIDENTIAL		5	$7,376	10	$16,594	14	$26,563	13	$27,946	13	$30,674
Graham	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		6	$19,385	8	$23,366	9	$31,170
Grant	added for TY 2013					*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Gray	added for TY 2013							*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Greeley	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Greenwood	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Hamilton	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		5	$38,300		*CONFIDENTIAL*
Harper	original ROZ county	*CONFIDENTIAL		11	$23,866	9	$24,225	11	$21,683	7	$6,540	9	$11,158
Haskell	added for TY 2013			*CONFIDENTIAL				*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Hodgeman	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Jackson	added for TY 2013			*CONFIDENTIAL		*CONFIDENTIAL				*CONFIDENTIAL			*CONFIDENTIAL*
Jewell	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Kearny	original ROZ county			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		6	$27,552
Kingman	original ROZ county	*CONFIDENTIAL		13	$27,069	10	$22,430	6	$26,143	5	$23,729		*CONFIDENTIAL*
Kiowa	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		5	$10,089		*CONFIDENTIAL*
Labette	added for TY 2014									5	$32,387	7	$44,720
Lane	original ROZ county			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Lincoln	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		8	$14,738	10	$18,951	7	$15,361
Linn	added for TY 2013			*CONFIDENTIAL		*CONFIDENTIAL				*CONFIDENTIAL		5	$15,144
Logan	original ROZ county			5	$7,947	5	$21,307	8	$27,622	9	$29,658	11	$44,876
Marion	original ROZ county	*CONFIDENTIAL		8	$14,565	15	$34,230	26	$44,784	28	$39,995	25	$49,582
Marshall	added for TY 2013			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		6	$18,445		*CONFIDENTIAL*
Meade	added for TY 2013					*CONFIDENTIAL		*CONFIDENTIAL		5	$19,901		*CONFIDENTIAL*
Mitchell	original ROZ county	*CONFIDENTIAL		10	$17,120	12	$17,521	10	$17,757	12	$23,113	9	$45,303
Montgomery	added for TY 2014					*CONFIDENTIAL		14	$65,751	21	$100,760	39	$207,785
Morris	added for TY 2013												
Morton	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL					*CONFIDENTIAL*
Nemaha	added for TY 2013			*CONFIDENTIAL		*CONFIDENTIAL		5	$14,535	*CONFIDENTIAL		6	$26,548
Neosho	added for TY 2013			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		7	$11,450	5	$15,038
Ness	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL				*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Norton	original ROZ county	*CONFIDENTIAL		9	$20,248	10	$20,006	13	$28,957	12	$27,286	13	$32,672
Osborne	original ROZ county			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Ottawa	added for TY 2013							*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*

Pawnee	original ROZ county	6	$10,361	7	$15,981	11	$27,056	11	$33,255	15	$44,438	17	$60,459
Phillips	original ROZ county	*CONFIDENTIAL		18	$54,605	20	$62,165	22	$71,836	15	$40,962	15	$37,761
Pratt	original ROZ county	5	$10,074	6	$17,245	9	$28,263	7	$28,851	5	$18,838	5	$21,843
Rawlins	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		8	$41,660	5	$19,261	5	$14,558	13	$29,466
Republic	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		10	$85,717	11	$98,895	11	$26,072	10	$27,541
Rice	added for TY 2013			*CONFIDENTIAL		*CONFIDENTIAL		5	$12,960	8	$17,685	9	$22,449
Rooks	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		9	$13,115	6	$7,854
Rush	original ROZ county			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Russell	original ROZ county			*CONFIDENTIAL		7	$20,303	11	$24,822	11	$29,638	7	$18,627
Scott	original ROZ county	*CONFIDENTIAL		8	$10,905	*CONFIDENTIAL		7	$8,629	5	$10,238	9	$20,621
Sheridan	original ROZ county	*CONFIDENTIAL		5	$9,425	*CONFIDENTIAL		9	$20,024	*CONFIDENTIAL			*CONFIDENTIAL*
Sherman	original ROZ county	10	$11,799	13	$15,976	13	$24,775	13	$36,367	30	$54,206	32	$61,411
Smith	original ROZ county	*CONFIDENTIAL		12	$27,680	18	$43,539	14	$27,111	11	$26,594	16	$39,079
Stafford	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Stanton	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Stevens	added for TY 2013			*CONFIDENTIAL		5	$20,201	5	$32,192	*CONFIDENTIAL			*CONFIDENTIAL*
Sumner	added for TY 2014					*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Thomas	original ROZ county	5	$6,638	20	$39,177	29	$77,909	38	$86,629	52	$112,112	43	$108,087
Trego	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		5	$27,521	7	$32,549	9	$37,103	6	$33,481
Wabaunsee	added for TY 2013							*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Wallace	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Washington	original ROZ county			*CONFIDENTIAL						*CONFIDENTIAL			*CONFIDENTIAL*
Wichita	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*
Wilson	original ROZ county	*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		6	$38,487	9	$35,936	11	$40,112
Woodson	original ROZ county			*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL		*CONFIDENTIAL			*CONFIDENTIAL*