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Special Taxing Districts: An Analysis of States' Oversight & Accountability Practices and How Kentucky Could Adopt Best Practices for More Accountability

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Table of Contents

Executive Summary... 3

Identification of the Problem... 4

Literature Review & Historic Perspective... 5

States Overview... 5

 Arizona... 6

 Colorado... 7

 Florida... 9

 Illinois... 11

 Kentucky... 12

 Missouri... 14

 New York... 15

 Texas... 16

 Washington... 18

 Wyoming... 19

Research Question & Design... 20

Analysis & Findings... 24

 Government Structure... 24

 Special District Types... 25

 Number of Districts in Each State... 27

 Revenue Sources... 26

 Transparency in Reporting and Accountability... 28

An Examination of Kentucky's Legislative Actions... 31

 Kentucky's Current Policies... 33

Recommendations... 34

Conclusion... 36

Appendix... 37

Executive Summary

Special districts are forms of government that were initially developed from the need to provide specialized services to a growing population with limited tax abilities. Local governments were faced with increasing populations and increasing needs such as health and human services, conservation, sanitation and water, and fire protection to name a few. With the states' limitations on the tax rate changes, local governments were finding it increasingly difficult to meet the needs of the taxpayers. In many states, legislators recognized this issue and allowed single purpose government-like entities to be created and if they qualified, gave them taxing power. Despite being public entities that provide public services, many special districts are unknown to the taxpayers, and many do business without the constraints of government budget rules or spending transparency (Cross, 2017).

Regardless of a special district's legislative origin or the services provided, its budget is not reviewed by the legislature and its spending and debt are not reported as part of other government budgets. "The potential for special districts to be used to evade normal forms of governance and established fiscal limitations makes transparency and accountability in their spending and operations particularly important" (Cross, 2017 para 5).

In recent years, states have started to bring to light the issue of special districts' (some of which have taxing power) oversight and accountability to minimize the tax stress they are placing on local taxpayers as the fastest growing form of local government. Texas, Illinois, and Kentucky have all taken steps to improve transparency and in the 2020 legislative session, Kentucky took steps to address oversight in passing Kentucky Revised Statute 65A.110.

This paper addresses the most current status of special districts, most notably, those with taxing powers, in ten different states and what transparency, oversight, and accountability measures are in place to ensure these entities are taxing and spending responsibly. As well, it highlights the state of Kentucky and makes recommendations for both administrative and legislative oversight of special districts for better accountability to the taxpayers resulting in specific “best practices” for state governments to consider.

I. Identification of the Problem

A. Literature Review and Historic Perspective

Special taxing districts in the United States were created by local governments to provide specific services in response to public demand. These districts usually offer a single service such as education, transportation, and fire protection to name a few. Special taxing districts across the nation possess some of the same governing qualities as states, counties, and cities. In some states, they can enter into contracts, employ workers, acquire real property through either eminent domain or purchase; they can also issue debt, charge fees for services, impose taxes, and levy assessments (Siegal, 2018).

Historically, western states utilized special districts for water and agricultural needs in the 19th century. They became popular amongst local governments because they took the financial burden and constraints of providing specialized services off them and allowed these services to be provided independently. In fact, by the early 21st century, tens of thousands of special taxing districts were established nationally (Siegal, 2018).

According to Siegal, 2018 one classification of special district types covers three sets of contrasting features: single function versus multifunction, enterprise versus non-enterprise, and

independent versus dependent. The most common is a single function special district. Examples of these include libraries, cooperative extension, fire protection, cemeteries, health, and highways. Multi-functional districts can be parks and recreation, housing and community development, water supply, and sewerage. Examples of enterprise special districts include gas, water, and electric utilities. Rather than taxing every citizen, these entities typically charge consumers by consumed quantity. Non-enterprise districts often charge user or service fees but rely heavily on property taxation or sales taxes. Examples of these are fire protection, libraries, and police protection. Independent special districts have their own governing board of directors elected by the district's voters for fixed terms and dependent districts are governed by the elected bodies of general-purpose government. Dependent districts are those such as street lighting maintenance or mosquito abatement districts (Siegal, 2018).

B. State Overview

The following section provides a brief overview of nine states and how they utilize, manage, and oversee special taxing districts. These states were selected for various reasons discussed further in the research design section of this paper. Overall, the goal was to develop a good selection of states that were a geographical representation of the nation. These states represent the Northwest, Southwest, Mid-West, Southeast, Northeast, and Central parts of the United States.

In each state overview there is an example of fraud or mismanagement that was found connected to a special district apart from Florida because none could be located through an audit report or web search. These examples are intended to highlight the ease of mismanagement when there are little requirements for reporting and transparency.

Arizona

As of the 2007 Census data, Arizona had 4.7 special districts per 100,000 people, ranking at 42 of 50 in the number of special districts per capita. However, not all special districts have taxing power. In Arizona, 99.2% of special districts are taxing districts, making it number 1 of 50 of states that have the highest percentage of special districts with taxing power (Slivinski, 2014). The Arizona Legislature authorizes and specifies the forming process of 41 types of special taxing districts such as fire districts, irrigation districts, hospital districts, pest control districts, and power districts. While the specific process is dependent on the type of district to be formed, the training often calls for petitions to be submitted to the county supervisory board, followed by a public hearing. An election may sometimes be necessary to constitute a district. There are greatly differing processes for determining certain districts, such as stadium districts. Statute also stipulates district dissolution mechanisms and district border change methods (Arizona State Senate, 2018). “In Arizona, there are over 326 special districts. In 2013, the last year for which data was available, those special districts managed well over \$5,598,031,000. These numbers are conservative since only a fraction of special districts actually report to the U.S. Census” (*Targeted News Service*, 2017).

The latest legislative action regarding special districts in Arizona went into effect in 2015 with ARS 48-254: Truth in taxation notice and hearing; roll call vote on tax increase. This statute requires special districts to notify property tax owners of its intent to raise taxes beyond the previous year's level. They then must hold a public hearing on the tax increase where the governing body holds a roll call vote on the tax levy (Arizona State Legislature, 2021).

In 2016, there were investigations by the Arizona Auditor General into a water improvement district regarding theft and conflict of interest and a fire district for theft and misuse of public funds. In 2017 another investigation into the same water improvement district for theft and misuse of public monies. There was a single investigation in 2018 into an irrigation district for theft and conspiracy. In 2019 another irrigation district was investigated for theft and misuse of public monies (Arizona Auditor General, 2021).

Colorado

Colorado has about 2400 special districts. Colorado frequently uses special districts to finance the costs of building new residential communities on undeveloped lands for development. For example, state law requires that developers provide at least two services to build a subway district. Building new housing communities on undeveloped ground is often financed by developers. State law requires development workers to provide at least two services, such as new sidewalks, streets, green spaces, fire protection districts, or water services, to create a metro district (Stamas, 1992).

Special districts in Colorado are local governments, i.e., political subdivisions of the state.

Colorado law limits the types of services that county governments can provide to residents so there is a need for special districts to fill in the gaps. The types of special districts are ambulance, health services, sanitation, health assurance, metropolitan, fire protection, water, park and recreation, and water & sanitation. “As political subdivisions of the State of Colorado, special districts are required to submit a number of required filings to various state agencies throughout the year. These filings are primarily financial, but also include election results, lists of boards of directors, and others” (Colorado Department of Local Affairs, 2021 para3).

In 2019, Tim Holles wrote a semi-investigative article about the special districts in Colorado Springs where he resides. By his count, there were 118 special districts of various types in this town alone. After three different controversies around a few of these districts, questions started being raised about why there are so many districts, how they function, what they do, where the money goes and whether they continue to serve the interests of the taxpayers. These questions are not new as Holles pointed out that there was a white paper written by the City of Colorado Springs in 2009 that not only documented the explosion of these districts but also 15 reform recommendations to “bring more transparency, accountability and analysis to the oversight and approval process” (Holles, 2019 p2). As a result of these issues, Holles indicated that Colorado Spring City Council requested a months-long series of detailed briefings on special districts from city staff.

There has not been a legislative provision in Title 32 that requires reporting or transparency in budget or expenditures, however, in the 2021 session, SB21-262 concerning special district transparency was passed. There are seven sections to this bill; of note are sections 3, 4, 6 and 7. Section 3 addresses metropolitan districts specifically. They are required to update and maintain their websites and make readily accessible to the public all the information that is specified in the bill. Section 4 outlines the statutory requirements for annual reporting to be filed by special districts and better outlines the type of information that must be reported. Section 6 reigns in the metropolitan districts exercising its power of dominant eminent domain within a municipality other than within the boundaries of the jurisdiction that approved its service plan, without written approval by the governing body of the municipality. Finally, section 7 requires homeowners within a metropolitan district who sell their property to disclose to the buyers certain information relating

to the finances of the metropolitan district to include debt obligations of the district and an estimate of property taxes at the time of sale (Colorado General Assembly, 2021).

Florida

Special Districts in Florida are classified into two categories; First is the school districts. Historically, Florida public schools have been considered locally responsible for administration and financing, but the general purpose of local governments does not best serve them. As the population grew and the need arose, special districts were established to provide local public schools. The State Constitution initially provided that a county or district could be divided into convenient school districts and that the municipalities could be school districts. Nearly 600 school districts were in place by 1947. This situation has created many administrative problems and hastily consolidated laws that have coexisted in sixty-seven school districts. This formulation now has a constitutional basis for school districts. Similarly, the Constitution stipulates the formulation of the governing body of the school districts and the description of the purpose to which they shall serve. Scholastic districts also have the special constitutional authority to levy and issue bonds at valuable rates. Thus, although school districts are not units of the general local administration, they are not considered in the paper due to their special constitutional status and their familiar, uniform presence throughout Florida.

The second type provides facilities and services for water management. In 1972, the Florida Legislature tried to reorganize the different water management districts of the State and place them under the overall supervision of the Natural Resources Department. As a result, the State was divided into five districts of water management. For purposes of water management in the northwest part of the State, lying west of the line between the two east lines, 0.05M; for purposes

of water management in the remainder of the State, 1.0M shall not be charged over or above the following factors relating to the assessed value of the real estate and tangible personal property (Hudson n.d).

In the 2021 Legislative session Florida House and Senate passed HB 1103- Special Districts Accountability. This bill was approved by the Governor and will be in effect October 1, 2021. This bill addresses independent special fire control districts, hospital districts, independent mosquito control districts, and soil and water conservation districts to undergo performance reviews every five years and requires all special districts to include additional information in their annual financial reports, specifically:

1. Total number of district employees compensated in the last pay period of the fiscal year.
2. Total number of independent contractors paid in the last month of the fiscal year.
3. All compensation earned by employees.
4. All compensation earned by independent contractors.
5. Each construction project with a total cost of at least \$65,000 approved to begin after October 1 of the fiscal year being reported, together with the total expenditures for the project.
6. A budget variance report.
7. For independent districts that impose ad valorem taxes, the district's millage rate, total amount of ad valorem taxes collected, and the total amount of outstanding bonds issued by the district and terms of such bonds; and
8. For independent districts that impose non-ad valorem assessments, the assessment rates, the total amount of assessments collected and the total amount and terms of outstanding bonds. (LLW, 2021)

Illinois

A report issued by the Civic Federation in February of 2021 indicates that the state of Illinois currently has 6,097 special purpose governments for 102 counties all of which have at least limited taxing authority. Combined, these special districts accounted for \$4.4 billion in property taxes in 2018, approximately 14% of the state's total. This makes Illinois the state with the most special districts in the nation (The Civic Federation, 2021). There are 27 types of special taxing districts that include many of the same types as other states but also include rescue squad districts, river conservancy districts, street lighting districts, and museum districts. These districts are considered local governments and may enact ordinances, rules and regulations to carry out their various duties (Hynes, 2000). Chapter 70 in Illinois statutes identifies every recognized type of district and the conditions of creation, what authorities they have, what their taxing privileges are, and the reporting requirements.

Currently, the process for consolidating units of government varies significantly and the procedures for doing so are complex and often prohibitive to citizens and local governments. The 2021 legislative session brought forth HB 433- The Citizens Empowerment Act to allow Illinoisans to petition for a ballot initiative for the dissolution of local government units that are no longer necessary. This measure will allow residents to work around existing barriers to consolidation such as protectionism by local officials (Carlson, 2021).

In 2018 a report issued by Illinois Policy discussed wasteful spending in all areas of Illinois government. Highlighted were Park districts that account for over 10% of statewide property tax extensions and the amount of frivolous spending that occurs. Of note was a total of \$500,000 in

lobbying expenses, more than \$1 million on advertising and promotional materials, and outrageous spending on conference attendance and fees. Northbrook Park District was the number one offender spending \$101,180 in lobbying fees to Illinois Association of Park Districts, National Recreation and Park Association, and Illinois Park and Recreation Association. They spent over \$16,000 on registration, housing, and transportation expenses to attend conferences and over a three-year time frame spent \$424,409 on promotional materials and marketing. “The district spent almost \$200,000 on brochures and guides, and almost \$50,000 on promotional t-shirts over the three-year period. The district also spent over \$40,000 on paid advertising, including \$666 on Facebook ads and \$140 for district employees to attend a class on social media marketing” (Schuster et al., 2018).

Illinois took a small step in 2015 in passing a law that required the creation of the Greater Chicago Mass Transit Transparency and Accountability Portal which has resulted in the publication of financial information to include contracts and employee salaries (Carlson, 2021).

Kentucky

“Kentucky Revised Statutes (KRS) 65.005 defines special districts as “any agency, authority, or political subdivision of the state which exercises less than statewide jurisdiction and which is organized for the purpose of performing governmental or other prescribed functions within limited boundaries. It includes all political subdivisions of the state except a city, a county, or a school district.” (Edelen, 2012)” (Dockter, 2021).

In his 2012 report, “Ghost Government” Edelen noted that there are between 1000 to 1800 districts collecting \$500 million and \$1.5 billion a year in tax revenue with only a governing board composed of non-elected members. Some districts, he said, “operate not just in the shadows but in pitch-black darkness.” (Edelen, 2012).

In 2012, auditors uncovered \$123,000 in what they labeled “questionable spending” at the Garrett Area Volunteer Fire Department in Floyd County, KY. The spending in question was done by the former assistant chief who also acted as treasurer for the department and the Garrett Fire District. According to an article in the Lexington Herald Leader in 2012, “Auditors found numerous financial irregularities in the Garrett fire department's accounts, including more than \$62,000 in questionable cash withdrawals, \$16,500 in restaurant charges, \$4,600 in gift cards from one store and \$839 for fireworks...The review also found that Triplett had purchased a vehicle with department funds and had opened a store credit card in the department's name. Two flat-screen televisions, a laptop computer, digital camera, alcohol, chewing tobacco and other items were charged to that card” (Musgrave & Estep, 2012).

As a result of his investigation and audits such the one above, the 2013 legislative session brought forth House Bill 1, now codified as KRS 65A redefined special districts to include agencies that were not previously considered special districts and renamed them a “Special Purpose Government Entity” (SPGE). To be considered a SPGE, an entity must meet the standards in a four-prong test. The Department for Local Government was charged with implementing HB1 and now, any entity that is a SPGE must register and provide financial disclosure each fiscal year and must complete both parts to be compliant (Department for Local Government, 2021).

In 2018, the Kentucky Senate passed SB 25 that requires SPGEs to submit the proposed tax rate to the county or city government officials for approval or denial. This was their effort to manage the taxation without representation (LegiScan, n.d.). That bill was rejected during that session but one similar was introduced in the 2020 session and passed.

Missouri

There are 2,200 Special Districts in Missouri, which include ambulance, levee, library, the port authority, and the transport development districts. These districts not only can impose property taxes, but also sales tax. A Community Improvement District (CID) is initially approved by local municipality but then operates as a separate political subdivision that governs itself and is allowed to collect special assessments, additional property taxes and sales taxes. A Transportation Development District (TDD) is much the same as the CID, but it is limited to sales tax increments of $\frac{1}{8}$ percent up to one percent (Lees Summit, 2021). According to State Rep Christofanelli, there is no state entity currently providing a detailed view of where all these districts are and how they overlap, and when they overlap, the rate of sales taxes tends to increase. There are places in Saint Louis and Kansas City areas with sales taxes of over 10%, and some are close to 12% (Hauswirth, 2018).

According to a follow-up audit report conducted by the Missouri State Auditor, in November of 2016, three former Buck Prairie Special Road District board commissioners and three former district employees were charged with 23 separate felony counts of receiving stolen property (Galloway, 2017). These charges are a result of padding overtime records, taking extra vacation time, using district property on personal vehicles, taking automotive equipment, paving a road in front of their home, and accepting money for attending meetings (Galloway, 2017). This is only one example of mismanagement of many when looking at audit reports conducted by the state auditor.

New York

In New York, subdivision 16 of section 102 of the Real Property Tax Law (RPTL) defines special districts as “a town or county improvement district, district corporation or other district established for the purpose of carrying on, performing or financing one or more improvements or services intended to benefit the health, welfare, safety or convenience of the inhabitants of such district, and in which real property is subject to special ad valorem levies or special assessments for the purposes for which such district was established” (Silver, 2009 p1). The U.S. Census Bureau in their five-year reports, the *Census of Governments*, defines special districts as being “independent, special purpose governmental units (other than school districts). They exist as separate entities, have substantial fiscal independence, and have administrative independence from general purpose local governments or function for multiple governments” (Silver, 2009 p2). These two definitions overlap somewhat, but the difference is that the census definition does not include the most prominent form of special district in New York: town improvement districts. These districts are not separate, independent entities. They are governed by the town board in which they are established so they are included in the RPTL definition but not the census. The types of districts included in the census definition that are found in New York are fire districts, fire alarm districts, fire protection districts, joint fire districts, town improvement districts, business improvement districts, county districts, and districts created by Special Act of the State Legislature which include public libraries. New York distinguishes special districts from local districts which do not provide services but are administrators for certain functions such as county welfare districts, consolidated health districts, agricultural districts and soil and water conservation districts. Of note, these districts in other states are not set apart.

In an article dated July 28, 1974, in the New York Times, the State Office of Local Government identified 3,182 public entities with the power to tax and incur debt. In addition, 5,294 special districts provided water, sewers, street, lighting, fire protection and other services. The Commissioner of Local Affairs, Dr. Sal Prezioso, was quoted as saying, “Although special districts are still viable in many parts of the state, in other areas, they have outlived their usefulness and it is time for a reassessment” (Faber, 1974 para 8). Farber goes on to indicate that a report, “Special Districts’ and Their Alternatives”¹ pointed out that special districts were the fastest growing of all government units in numbers. The report recommended that the towns should have the option of providing the services as town functions. Fast forward to 2007 and a report issued by the Office of the New York State Comptroller, Thomas DiNapoli, indicated New York had 4,200 local governments and 6,900 town special districts and they are still questioning if special districts are the best approach to handling the increased growth in towns.

Texas

Special taxing districts in Texas were originally created to provide infrastructure and levy taxes for a limited purpose. Among those are firefighting, road construction and water and sewer treatment. “These districts are given significant powers, including the power to acquire, purchase, sell, or lease real or personal property; sue and be sued; impose and collect taxes; issue bonds; borrow money; and contract with other entities. Some districts are granted the power of eminent domain” (Texas Senate Research Center, 2014 p2). Special taxing districts in Texas are governed by the commissioners’ court or a board of directors of the county in which they are established (Invisible Government, 2014). Some of the common problems associated with special districts in Texas are

¹ This original article could not be located.

layering of local governments, contribution to inflated property taxes, questions of accountability, and lack of transparency (Texas Public Policy Foundation, 2018).

The Texas constitution authorizes the creation, sets forth procedures for governance, structure, and powers of the districts. The Special District Local Laws Code was created in 2003 during the 78th Legislature Regular Session and is an ongoing project of the Texas Legislative Council. This was in response to an investigation by the State Attorney General in 2002 brought about by lawsuits filed against some districts for abusing their bond power (Albanese, 2002). In 2018 Texas Public Policy Foundation made the following recommendations to the legislature:

- Require special districts to adhere to basic financial transparency standards, such as the public posting of budgets, financial statements, and a check register online.
- Create a comprehensive review process for SPDs to undergo a periodic assessment of its roles and responsibilities.
- For certain districts, include a “sunset” provision that automatically expires the district unless a public vote affirms the continuance of the SPD.
- Require SPDs to hold an election to approve a tax rate that increases annual property tax revenue by more than 4% or population growth plus inflation, whichever is less.

In the 2021 legislative session, SB526 was introduced to require special districts to include financial and operating information on their websites for the public to be more transparent. This bill died in the chamber.

Washington

The state of Washington is similar to New York in that its definition of a special district varies from the U.S. Census Bureau. In fact, Washington has “no single uniform definition of a special district or a special purpose district in the Revised Code of Washington (RCW). Special districts and special purpose districts are defined within the context of a particular title or chapter of the RCW. The definition generally applies only to the provisions addressed by a particular statute. The legislation enabling a "district" may call it something other than a special purpose district, leaving to be determined whether it has a separate governing body and fiscal autonomy” (MRSC, 2021 para 4). Also, of note, the terms “special district” and “special purpose district” are used interchangeably and are commonly referred to: limited purpose special districts, benefit assessment districts, certain taxing districts, junior taxing districts, some authorities, some special benefit districts, and any local government in Washington which is not a city, town, or county.

The classifications for special districts include body corporate, municipal corporations, municipalities, public body corporate and political, quasi-municipal corporations, and units of local government. (Municipal Research and Services Center of Washington, 2012).

In 2019, an investigation into a King County drainage district regarding a commissioner that diverted tax money into his personal bank account resulted in a public revelation that the nearly 2,000 special districts in Washington have little oversight or taxpayer accountability. In this instance, the commissioner has held that title for 30 years because state law allows him to hold office without an election if no one else filed to run. Conservation district candidates are elected exclusively by voters who request a ballot from the conservation district. Chris Ingalls pointed out in an article written for King5 news that a century old law allows these districts to collect taxes

without a vote for approval or without officeholders being re-elected to their position (Ingalls, 2019). The FBI was called in to investigate this alleged mismanagement and garnered attention from state Senator Reuven Carlyle. In an interview conducted by King 5 news, he claimed that he would be proposing changes in state law in 2020. The 2020 legislative session resulted in the passing of ESHB 2588- Improving openness, accountability, and transparency of special purpose districts. The bill does the following and was effective June 11, 2020:

- Prohibits a special purpose district (district) and the county auditor from issuing any payments against the funds of a district that has been determined unauditible by the State Auditor's Office (SAO).
- Prohibits the State Treasurer from distributing any local sales and use taxes to a district that has been determined to be unauditible by SAO.
- Allows a county to dissolve a district that has been determined to be unauditible by SAO and impose a separate property tax levy or assessment if the county assumes responsibility for services previously provided by a dissolved district. (Department of Revenue Washington State, 2020)

Wyoming

Wyoming has 26 different types of special districts, and there are over 650 special districts in Wyoming that provide essential services to protect their citizens' health, safety, and general well-being. Collective membership in these regional councils include more than 2,350 Wyoming citizens, excluding 9 of the listed bodies, which include Joint Authority and similar types of bodies. These members of the Board serve the communities of Wyoming without pay. In the absence of additional time spent in their special districts, the district boards meet monthly and spend

approximately 55,000 hours conducting special district business. Thus, the value of the time in the voluntary sector would amount to \$1,265,000 serving the State and its communities annually, without any cost (Wyoming Association of Special Districts, n.d.). The 2021 legislative session brought forth a bill that allows the creation of a 27th type of special district: airport districts. This bill died on the third reading in the House.

The latest audit conducted on a special district in Wyoming shows several findings of financial inaccuracy (there was a \$79,554 difference in expenditures and \$77,865 difference in cash and investments), lacking internal controls, and noncompliance for the Riverton Recreation District #25. Looking at past audits for similar special districts, these findings are consistent with the exception of financial inaccuracies.

C. Research Question and Design

Based on the various ways states approach oversight and control, several research questions are of interest to this paper:

- 1) What issues have occurred that may have spurred legislative consideration for increased oversight and accountability of special districts?
- 2) What steps have states taken to improve transparency and/or control of special districts with taxing authority?
- 3) What lessons can other states, specifically Kentucky, learn from these actions to develop best practices and improve oversight and accountability of special districts?

Special taxing districts have become popular means of circumventing state laws that limit the local governments' ability to tax. These districts often collect more tax revenue than local governments without many of the restrictions and standards. The "unprecedented growth in special districts is

leading to a showdown with the federal government over the ability of local governments to issue public capital debt and could preempt the authority of many states and localities” (Shafroth, 2013 para 8). Many states have seen an uptick in the creation of special taxing districts with little accountability and oversight leading to misuse, abuse and in some cases corruption.

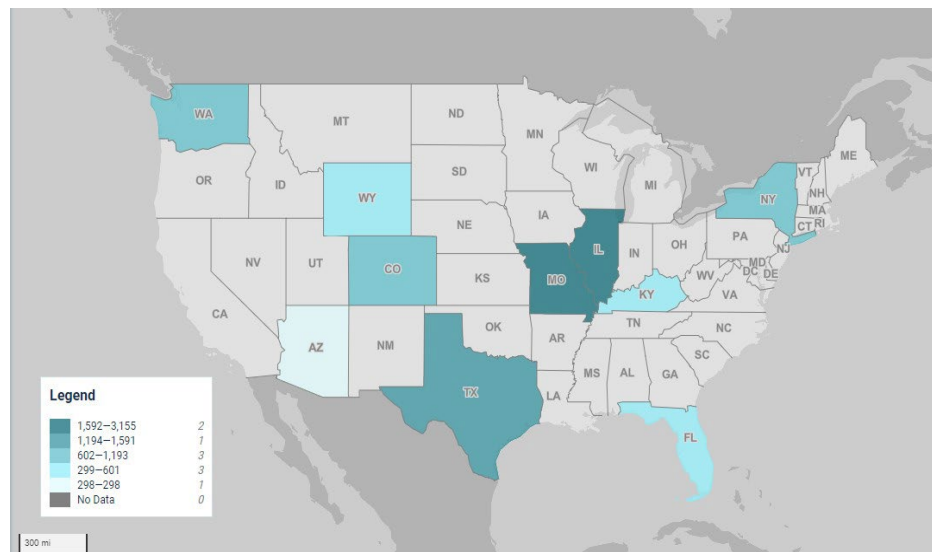
The hypothesis behind this research is that special taxing districts are not widely overseen by or accountable to local or state governments and have been given authority and power without the same restrictions as local governments. This study investigates the impact special districts have on local tax rates and possible mismanagement as well as how states oversee special districts to assure transparency and accountability to the taxpayer.

A research design using case studies is used to describe systematically and accurately determine the facts and characteristics of special taxing districts in ten states that were chosen due to the information available regarding the legislative approach to formation and oversight. These states also provide geographical diversity to provide a better national overview.

Using a case study approach provides an understanding of this diverse and complex issue by providing an analysis of each state and the issues they experience. This design can add strength to what is already known through previous studies and examines real-life situations to provide the basis for the application of concepts and theories. Limitations of this research strategy include using a small number of cases reduces reliability of the data and reduces confidence in making a generalization of the findings to other states. Another limitation or drawback to a case study design is that intense study of a case may bias a researcher's interpretation of the findings. A third limitation in this study is that each of the 50 states are different in terms of population and

structure. This makes the study of only ten states not typical and not necessarily representative of the problem as a whole (USC Libraries, 2021).

Information was gathered by first investigating random states to find readily available information regarding legislative action regarding special taxing districts. Once those states were identified, the list was narrowed to encompass states that were in different geographical locations to ensure a diverse study. The map below is a good visual of the representation, and the chart indicates the number of special districts reported to the U.S. Census Bureau in 2017. Based on the information gathered from individual states, these numbers are likely lower than the actual numbers due to the Census's definition of Special district versus the states' definitions and the reporting that results. New York, for example, indicated that the Census does not count their most prominent form of special district because it does not meet their criteria. Nonetheless, there do not seem to be numbers lower than what the census reports in any of these states.



State	Population estimates in 2019	SPGEs not to include school districts (US CENSUS 2017)
Arizona	7,278,717	552
Colorado	5,758,736	2,808
Florida	21,477,737	1,234
Illinois	12,671,821	4,090
Kentucky	4,467,673	787
Missouri	6,137,428	2,427
New York	19,453,561	1,863
Texas	28,995,881	3,871
Washington	7,614,893	1,580
Wyoming	578,759	672

data.census.gov

Florida was selected because of its geographic location as a representation of the Southeast.

Kentucky was chosen as one of the ten states due to the research question that addresses how other states in the nation legislate special taxing districts and how Kentucky could improve its legislative approach to oversight and accountability of its special districts. Texas, Colorado, and Illinois were selected because they have some of the highest numbers of special districts in the nation. The rest of the states were chosen based on geographical location.

Data collection such as population, local government structure, special taxing district creation laws, reporting laws, any type of oversight assigned to special taxing districts are identified as well as any reports of inflated tax rates, and issues of mismanagement of public funds surrounding special taxing districts. This was achieved through identifying peer reviewed studies or scholarly articles as well as local news reports, state investigative reports, state legislative pages, and the US Census database.

II. Analysis & Findings

There is not a central location in most of these states that provides specific information on the special districts within their state. Kentucky, Florida, Illinois, Washington, and Wyoming all have dedicated websites for Special Districts. The other five states give some information through the legislature pages and others had to be found by searching other government pages such as the state comptroller. For the purpose of context, an analysis was done on each state to include a government structure, types of special districts, the number of special districts present in each state, where they derive their revenues, and finally, their transparency and accountability.

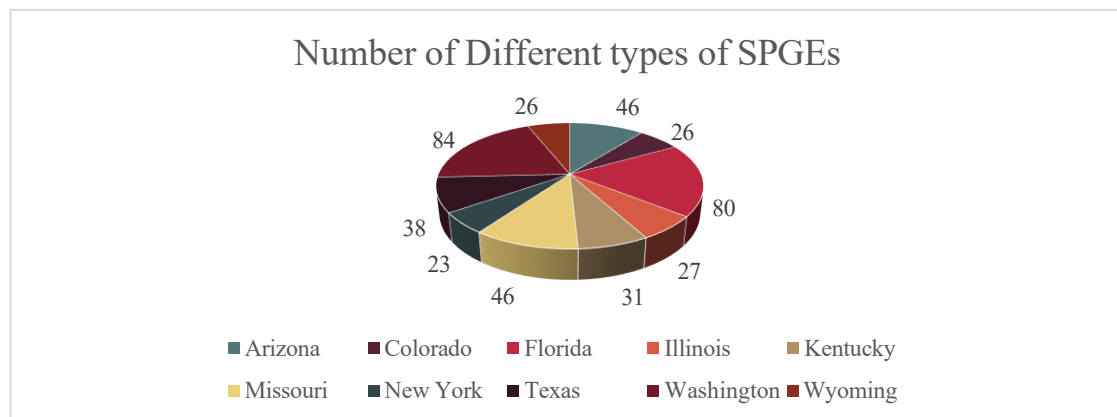
A. Government Structure

When analyzing the ten states above, one of the major differences among them was the general-purpose local government structure. The different types among these ten states were counties, cities, towns or townships, villages, and municipalities. This is important because each general-purpose local government then utilizes special taxing districts to supplement services. The chart below indicates the forms of general-purpose local governments found in each state.

Types of General-Purpose Local Governments						
State	County	City	Town	Municipality	Villages	Boroughs
Arizona	x	x	x			
Colorado	x			x		
Florida	x			x		
Illinois	x		x	x		
Kentucky	x			x		
Missouri	x	x		x		
New York	x	x	x		x	x
Texas	x	x				
Washington	x	x				
Wyoming	x		x	x		

B. Special District Types

Each of these states vary in the different types of special districts and the number of different types ranges from 20-84 with a mean of 42.7 and a median of 34.5. The graph below shows the number of different types of special districts in each state. Appendix A provides a list of all the different types of special districts in each of the ten states.



The different types vary by state and needs of the general-purpose local government to provide a service to its taxpayers. For example, according to Edelen’s report, “Ghost Government,” the top ten most prevalent types of special districts in Kentucky are (in parentheses are the states where these types are present in some form but not necessarily prevalent):

1. Fire Protection Districts (AZ, CO, IL, MO, NY, WA, WY)
2. Water Districts (CO, FL, IL, MO, NY, WA, WY)
3. Cooperative Extension Districts
4. Soil Conservation Districts (CO, FL, IL, MO, WA, WY)
5. Public Health Districts (AZ, CO, IL, TX, WA)
6. Library Districts (CO, MO, TX, WA)
7. Industrial Development Districts (FL)
8. Ambulance Service Districts (CO, MO, NY)
9. Local Tourist & Convention Commissions (MO)
10. Local Air Boards (WA)

C. Number of Districts in Each State

Interestingly, Colorado is the only state to report that the existence of their special districts is a direct result of the state limiting the services that can be provided by the county. They have one of the highest units per 100K residents but have one of the least numbers of different types of districts.

State	Population Estimates in 2019	SPGEs not to include school districts (U.S.Census)	Number of Different types of SPGEs	Total SPGE units per 100K (Based on Governing 2012)
Arizona	7,278,717	552	46	7.8
Colorado	5,758,736	2,808	26	50
Florida	21,477,737	1,234	80	5.9
Illinois	12,671,821	4,090	27	32
Kentucky	4,467,673	787	31	17.7
Missouri	6,137,428	2,427	46	39.7
New York	19,453,561	1,863	23	9.5
Texas	28,995,881	3,871	38	13.7
Washington	7,614,893	1,580	84	21.3
Wyoming	578,759	672	26	116.1

data.census.gov

D. Revenue Sources

Revenues for special districts are primarily garnered from property taxes but some states allow for districts to impose a sales tax, excise tax, or other fees. Some tax levies must be voted on and some are not. Below are highlights of states that are slightly different from the average state's ability to only collect real and tangible property revenues.

In Washington, most special districts derive revenues from real property assessments and are referred to as taxing districts. Not all taxing districts are special purpose districts and some special purpose districts are not taxing districts. An example is the road district; it levies a tax for roads but is not governed by the county and has no separate governing authority. It is only a taxing unit used to collect a fee authorized by the state. Another example is the television reception improvement district; it garners revenue from an annual excise tax on television sets. It does not levy property taxes and is not considered a taxing district. "If its boundaries are less than the county, it is formed with a separate elected board and would be a special purpose government" (MRSC, 2021). Most property tax levies in Washington are restricted to \$5.90 and those districts that are not subject to that limit are restricted to a one percent of true and fair value statutory or constitutional limit.

Texas special districts are mostly supported by property taxes, but some are only allowed to collect sales tax. Some special districts collect both a property tax and a sales tax. A special subset of special districts is also permitted to impose a hotel occupancy tax. "Since district residents often pay the taxes to support a district's provision of services, voters of a proposed district generally must approve creation of the district, along with the tax to be adopted and the proposed or maximum tax rate" (TLC, 2002 p 6).

Special Taxing Districts Oversight & Accountability: A Comparison of States' Oversight & Accountability Policies

In Missouri, depending on the type of special district, they could impose one of or a combination of these fees: toll fees, business license tax, sales tax, and special assessments, and property tax (City of Lee's Summit, 2021).

Taxes Levied	AZ	CO	FL	IL	KY	MO	NY	TX	WA	WY
Property tax	x	x	x	x	x	x	x	x	x	x
Sales Tax	x	x	x			x		x	x	
Excise Tax	x									
User Fees								x		
Other fees			x			x			x	
Other taxes						x				

E. Transparency in Reporting and Accountability

When looking for special districts annual reports, there were mixed results. In Arizona, each county's Office of the Clerk of the Board is responsible for facilitating, monitoring, and assisting special districts fulfillment of the statutory requirements in annual budgets, annual reports, board elections, boundary changes, dissolutions, formations, and levies. Each county has its own website, and each manages it differently. For example, Maricopa County provides very little transparency details regarding the special districts within its boundaries whereas Yavapai County provides at least some fiscal information for each of the districts. None of them provided an annual financial report that outlined actual revenues or expenditures. In searching the state auditor's website, there are no audits available on these districts, only investigative reports. Arizona statutes specify reporting requirements that include an annual report, a budget, and an audit or financial review to be submitted to the county Board of Supervisors (BOS). The BOS must submit a report of compliance to the Governor and Legislature by March 31st each year.

Colorado has the Special Districts Association of Colorado and each special district in the state is listed with an unaudited revenue from Ad Valorem taxes as well as the current Mill Levy. For additional financial information, one must submit for an open record at an average cost of \$30. Most counties in Colorado also provide a listing with each special district with copies of annual reports. While Colorado special districts have reporting laws, there is not a statute that indicates who is responsible for ensuring compliance or the consequences of non-compliance.

Florida has been an exceptional state in regard to special districts. The Auditor General maintains a dedicated page for special district audit reports that are required to be submitted even when completed by an independent auditor. The Florida Department of Economic Opportunity provides website pages dedicated to the Special District Accountability Program that has every legislative statute pertaining to special districts available as well as compliance rules and accountability measures. It provides a list of oversight methods and the consequences when special districts fail to comply. Also present in Florida is the Florida Association of Special Districts, Inc. They provide a variety of services for special districts who are members to include professional development and resources for special districts.

There is very little information available for special districts in Illinois. Neither county nor city governments refer to them and the website dedicated to special districts on the State Comptroller is blank. No audit reports were located, and the state auditor's page appears to be broken.

Kentucky's Department for Local Government has a website dedicated to special districts and provides audit reports that have been submitted and budgets that include revenue but not expenditures. There is not a process identified for accountability if a district is noncompliant. County pages do not include special district information.

Missouri special districts lack transparency and reporting. The special districts are broken down into three categories: Community Improvement Districts, Transportation Development Districts, and Neighborhood Improvement Districts. A report by the state auditor, Nicole Galloway points out the weaknesses in the law that facilitate noncompliance with statutory requirements (Galloway, 2017).

New York provides very little information about special districts in general and other than the legislative statutes and the little information available on the state comptroller's website, does not indicate anything other than reporting requirements. There are no annual reports made readily available and there were no audits found for special districts.

The Texas Comptroller has a Special Purpose District Public Information Database that informs on the district's financial information and the sales tax and property tax rate it is currently imposing. To utilize this database, one must know the name of the entity. It will not generate a full report of all the special districts. There is not any other information available without an open records request.

In Washington, there is not a state site that provides annual reports for special districts and there is nothing on the county level that acknowledges the special districts within the boundaries. The state auditor's website does provide audits conducted on special districts, but they are few. There is no mention of noncompliance consequences and there does not appear to be an entity accountable for ensuring compliance.

Each county in Wyoming provides a list of special districts and their budgets to include both revenues and expenditures and the Wyoming Public Funds Division has a dedicated page for special district audits. It appears they conduct four to six per year.

Many of these states are examples of poor practices that resulted in reports of mismanagement due to the lack of transparency and accountability. Some states have good practices but could do more to safeguard public funds and provide a more transparent environment for taxpayers.

Overall, Florida seems to have a good handle on managing special districts to ensure transparency, accountability, and oversight. While they have many different types of special districts, they also have the least per 100K residents. When looking for reports of mismanagement, there were more instances of reports praising special districts (In Florida's special districts, small government delivers big benefits for citizens. Chris Lyon. Tampa Bay Times. March 2021) than any reporting mismanagement.

III. An Examination of Kentucky's Legislative Actions

Given the sampling of states in the previous section and the examples of how each oversees and manages special districts, the following section focuses on the management and oversight of Kentucky's special districts, particularly those with taxing authority and examines Kentucky's current legislation and specifically investigates recent legislative actions taken by Kentucky lawmakers regarding oversight. The objective of the investigation of Kentucky is to identify how and why these steps have been taken and the impact on oversight and accountability.

In January of 2011, The Legislative Research Commission released a report titled "Transparency and Accountability of Quasi-Governmental Entities" (Research Report No. 403). For clarification, they defined quasi-governmental to mean "entities created by governments to serve public interests, but which have a legally separate status. Board members often are appointed by government officials, and government officials may serve on a governing board. Typically, quasi-governmental entities are created or authorized to be created in statute" (Upton et al., 2011 p 1). It is noted that special districts are treated as quasi-governmental entities in this report because they satisfy the description.

As part of that report, a major conclusion was “Some entities, such as special districts, are not financially accountable to a local government” (Upton et al., 2011 p 2).

Shortly after this report was released, Adam Edelen did a deep dive into Kentucky’s special districts.

“In 2012, then Auditor of Public Accounts, Adam Edelen brought to light Kentucky’s “ghost government” of special taxing districts that number more than 1200 and are present in 117 of the 120 counties that make up the state. Of those, 776 have taxing rights. Edelen points out that taxpayers collectively pay more to special districts than they do to their county governments and are not being represented in the process of this taxation as there are no elected officials responsible for setting the tax rates for special districts. There are 1,017 statutes that govern special districts, and the earliest mention of a taxing district goes back to a Kentucky Court of Appeals case in 1868 (Edelen, 2018)” (Dockter, 2021).

“Edelen indicates that the first study his office was able to locate on special districts in Kentucky was from 1968 published by the Legislative Research Commission (LRC) “Report No. 48 on Special Districts” that made a case for defining special districts stating,

“The core of the difficulty of definition is the necessity of differentiation among numerous dependent, semi-independent, and independent governmental agencies with similar structures... No one can complete a study of special districts without being dismayed at the scarcity of available information on district activities. Until 1966, there was no provision for even a central recording of the creation of these units.” (Edelen, 2012).

Additional studies were done by the LRC in 1977, 1979, and 1984 and another in 2006 conducted by the Task Force on Local Taxation, yet still there is inadequate oversight and accountability (Edelen, 2012)” (Dockter, 2021).

Kentucky's Current Policies

“In 2012, Kentucky legislation enacted KRS 65A (to be in effect the following year) that requires special taxing districts to register with the Department for Local Government each year and to provide financial disclosures each fiscal year. Non-compliance results in a fine. (Edelen, 2012)

The most current legislative action regarding special taxing districts is KRS 65A.110 passed in the 2020 legislative session that will require special taxing districts, beginning January 2021, to submit the proposed tax rates for the following fiscal year to the governing body of the city or county in which they derive taxes. If the tax rate is set above the compensating rate, the fiscal court can approve or deny or can adjust to a lower rate that is still above compensating (Kentucky Revised Statutes, 2020).

As of the 2020 regular session of the Kentucky legislation, KRS 65A and 65A.110 are the only statutes that pose any type of regulatory oversight for special taxing districts and only in so much that it requires reporting and transparency and approval of tax rates by fiscal court (Kentucky General Assembly, 2020). KRS 132.280 ensures that special taxing districts established within an incorporated city continue to use city tax assessments for tax purposes rather than county assessments (Law Server, 2020).” (Dockter, 2021).

“The current policies surrounding special taxing districts are more focused on definition, formation, tax rate caps per year, reporting and more currently the involvement of the governing city or county to set tax rates. In terms of regulatory oversight, Kentucky’s special taxing districts are lacking in accountability in the areas of services, debt limits, excess expenditures, reserves, and asset management” (Dockter, 2021).

IV. Recommendations

The previous section has investigated how the states included in this study compare and contrast with respect to oversight, transparency, and accountability of special purpose governments.

Further, the recent and current legislative actions on Kentucky's part have been documented in detail. Based on the findings from the nine states, there are other legislative actions and steps Kentucky can take to make more improvements in accountability, transparency, and oversight of special districts.

Recommendation 1: To achieve maximum transparency, Kentucky should require local governments to include special district information such as annual reports, budgets, current tax rate information, reserves, and completed audits on their websites. Reporting requirements like those practiced in Florida would aid the fiscal courts in their review of tax rate proposals as is now required by KRS 65A.110.

Recommendation 2: It is also recommended that the Kentucky Department for Local Government readily provide a detailed listing of all statutes for special districts as Florida does on Floridajobs.org. This provides a clear understanding of the statutes and the requirements for formation, reporting, transparency, and the consequences for noncompliance.

Recommendation 3: Based on the lessons learned from other states, Kentucky should implement professional development requirements for special district fiscal managers. One could reasonably expect certain outcomes from special districts if education and support is adequately provided.

Recommendation 4: Kentucky should require special districts to reapply for status after a certain amount of time to eliminate special districts that are not useful to the taxpayers from continuing forever. Special districts are not private businesses that live and thrive on the investment and financial knowledge of the owner,

they are taxpayer funded entities that sometimes outlive their usefulness. The current statute, KRS 65.166, for dissolving a district is lengthy and complicated. This statute was last modified in 1980 and as such may need revisions.

In closing, as a personal observation as an employee of a special district and a property taxpayer in Kentucky, this subject is one of particular interest to me. I see how these districts continue to flex their taxing power on a regular basis and as a taxpayer, I have no say in it. There is no recourse when the boards of these districts are not elected. In some instances, these districts hold high reserves and continue to raise the tax rate without explanation. In many cases, one must use the open records act just to get their budget and any financial information requested. The fact is, they do not have to justify their expenditures or their reserves. In my county, there is a special district listed at the county sheriff's office that tax dollars are distributed to that not one person who *should* know, even the county judge executive, can explain who they are or what they do. It is a statewide special district, that purportedly deals with fire hazard properties that collects property taxes from qualified property owners and the county sends them a check. I finally got an explanation from the property valuation administrator. I contacted the Department of Local Government about this and the State budget office and no one could explain it to me. There is no accountability when these districts utilize hundreds of thousands of tax dollars to expand services that only reach a small fraction of the community. There is no one holding their collective feet to the fire if they are underperforming their services. They send reports to the state but are accountable to no one.

Conclusion

Special districts have become a growing phenomenon in the United States and have increased in popularity among local governments. Unfortunately, they have grown fast and fairly unnoticed. It has just been within the last decade that the problems that have resulted from outdated legislation have come to light. Slowly, states are taking corrective measures to protect public funds and taxpayers from errant mismanagement. Some of the ways to address the issues that have arisen from special districts are outlined in the previous section. No matter what, ignoring the problems that the rapid increase in special district implementation have brought up has only resulted in wayward spending and increased tax burden.

This study highlighted some very serious issues surrounding the legislation on reporting and accountability but was limited in that it relied solely on the information reported to the census and information states disclosed online. A comprehensive study in each state that provided details such as the report released by Adam Edelin would be beneficial to each state by highlighting the number of districts, if they overlap, how much they are collecting and how they are collecting them (via property tax, sales tax, etc.), what their expenditures are, and if they hold reserves. This information could then be used to determine if some of these districts should be consolidated, dissolved, or held to higher accountability standards.

Appendix A

Arizona

Active Management Area Water
 Agricultural Improvement
 Agriculture Preservation
 Anti-noxious Weed District
 Community Park Maintenance
 Cotton Pest Control
 County Free Library
 County Improvement
 County Jail
 County Television Improvement
 Drainage & Flood Protection
 Electrical District
 Fire District
 Flood Control
 Gateway Airport Authority
 General Provisions
 Groundwater Replenishment
 Health Service
 Hospital District
 Irrigation & Drainage
 Irrigation Water Conservation
 Irrigation Water Delivery
 Lighting District
 Multi-County Water Conservation
 Multijurisdictional Water
 Facilities
 Municipal Improvement
 Pest Abatement
 Pest Control
 Power Districts
 Project District
 Public Health Services
 Recreational Corridor
 Channelization
 Regional Attraction
 Regional Public Transportation
 Authority
 Regional Transportation authority
 Revitalization
 Sanitary District
 Special Healthcare
 Special Road Districts
 Stadium District
 Theme Park
 Tourism & Sports Authority
 Upper San Pedro Water
 Volunteer Fire District
 Water Conservation
 Water District

Arizona Revised Statutes | Title
 48 - Special Taxing Districts |
 Casetext

Colorado

Ambulance
 Business Improvement
 Cemetery
 Colorado New Energy
 Improvement
 Conservation
 Downtown Development
 Authorities
 Federal Mineral Lease
 Fire Protection
 Forest Improvement
 Health Assurance
 Health Service
 Irrigation
 Library
 Local Improvement
 Mental Health Care Service
 Metropolitan
 Park and Recreation
 Pest Control
 Public Improvement
 Sanitation
 Special Improvement
 Tunnel
 Water
 Water & Sanitation
 Water conservancy
 Water Conservation

guide_to_special_districts_2017.p
 df (colorado.gov)

Florida

Affordable Housing
 Airports / Air Navigation
 Facilities, Port Facilities
 Aquatic Weed Control
 Beach and Shore Preservation
 Beach Facilities
 Business Improvement
 Capital Improvements, Economic
 Development
 Children's Services
 Civic Facilities / Activities /
 Services
 Collaborative Client Information
 Systems

Common Facilities Maintenance
 Community Development,
 Infrastructure Development
 Community Redevelopment
 Conservation, Drainage, Water
 Control, Water, Wastewater
 Systems
 County Development
 County Fine Arts
 County Health and Mental Health
 Care
 County Road and Bridge
 County Water and Sewer
 Downtown Development /
 Improvement
 Drainage and/or Water Control
 Drainage and/or Water Control,
 Infrastructure Development
 Drainage and/or Water Control,
 Municipal-Type Services, and
 Improvements
 Drainage and/or Water Control,
 Road Maintenance
 Economic Development,
 Infrastructure Development
 Economic Development,
 Municipal-Type Services, and
 Improvements
 Educational Facilities Benefit
 Emergency Medical Services
 Emergency Medical Services, Fire
 Control and Rescue
 Environmental Protection /
 Management, Inland Navigation
 and Waterways
 Environmental Protection /
 Management, Recreational
 Facilities / Programs
 Erosion Control
 Expressway and Bridge
 Fire Control and Rescue
 Gulf Environmental and
 Economic Recovery
 Health Care
 Health Care, Hospital
 Health Facilities
 Higher Educational Facilities
 Financing
 Historic Preservation
 Hospital
 Hospital - County
 Hospital - Lease Oversight
 Housing Authority
 Housing Finance and Regulation

Florida (cont.)

Human Resources
 Industrial Development
 Infrastructure Development
 Inland Navigation and Waterways
 Juvenile Welfare
 Lake and Dam Maintenance
 Land Authority
 Library
 Licensing
 Mobile Home Park Recreation
 Mosquito Control
 Municipal-Type Services and Improvements
 Natural Gas Distribution and / or Transmission
 Neighborhood Enhancement
 Neighborhood Improvement
 Nursing Home
 Parking Facilities
 Planning - Coordination
 Planning - Land Use and Transportation
 Planning - Regulation
 Port Facilities
 Qualifying Improvements to Real Property
 Recreational Facilities / Programs
 Regional Transportation
 Regional Water
 Research and Development
 Safety Enhancement
 Soil and Water Conservation
 Solid Waste Disposal
 Street Lighting
 Transportation Systems / Services
 Utility Systems / Services
 Water and/or Wastewater Systems
 Water Management
 Watershed Improvement

Illinois

Airport
 Cemetery
 Conservation
 Drainage
 Exposition and Auditorium
 Fire Protection
 Flood Prevention
 Forest Preserve
 Hospital
 Housing Authority
 Mass Transit
 Mosquito Abatement
 Multi-Township Assessment

Museum
 Park District
 Port District
 Public Building Commission
 Public Health District
 Public Library District
 Public Water District
 Rescue Squad District
 River Conservancy District
 Road & Bridge District**
 Road District
 Sanitary District
 School District*
 Soil and Water Conservation District
 Special Recreation
 Street Lighting District
 Surface Water District
 Transportation Authority
 Village
 Water Authority
 Water Commission
 Water Reclamation District
 Water Service District

Types of Local Governments in Illinois - Illinois Comptroller's Office

Kentucky

Agricultural Extension
 Air Board
 Air Pollution Control
 Ambulance
 Area Development
 Area Planning Commission
 Community Action Corporation
 Community Improvement
 Drainage & Levee
 Sanitation District
 Fire Protection
 Fire Protection (Chapter 273- Vol Fire)
 Flood Control
 Hospital
 Housing Authority
 Industrial Dev Authority/
 Economic Dev
 Library
 Mass Transit Authority
 Mental Health
 Parks & Recreation
 Public Health
 Rescue Squad
 River Port Authority

Road District
 Sewer District
 Soil and Water Conservation
 Solid Waste Management
 Tourist & Convention
 Urban Services
 Water district
 Water Shed Conservancy

Missouri

Ambulance
 Benefit assessment special road districts
 Bi-State Metropolitan Development
 County Airport Authorities
 County Joint Recreational Lake Authority
 County Land Trusts
 County Library Districts
 Drainage Districts
 Economic Development Districts
 Exhibition Center and Recreational Facility Districts
 Fire Protection Districts
 Greater Kansas City Port District and Authority
 Hospital Districts
 Housing Authorities
 Interstate Bridge Commissions
 Jackson County Sports Complex Authority
 Joint Municipal Utility Commissions
 Kansas City Area Transportation Authority
 Law Enforcement Districts
 Levee Districts
 Library Districts
 Metropolitan Park and Recreation Districts
 Metropolitan Zoo District
 Metropolitan Zoological Park and Museum District
 Mine drainage districts
 Missouri and Kansas Metropolitan Culture and Recreation District
 Missouri-Kansas Development District and Agency
 Nursing Home Districts
 Port Authorities
 Regional Convention and Visitors Commission
 Regional Cultural and Performing

Missouri (cont.)

Arts Development District
 Regional Recreation Districts
 Road Districts
 Sanitary drainage districts
 Sewer Districts
 Soil and Water Conservation Districts
 Special road districts
 Special road subdistricts
 St. Charles County Convention and Sports Facility Authority
 St. Louis Regional Convention Center and Sports Complex Authority
 Street Light Maintenance Districts
 Theater, Cultural Arts, and Entertainment Districts
 Tourism Community Enhancement Districts
 Transportation Development Districts
 Water Conservancy Districts
 Water Supply Districts

A:\MO.ORG (census.gov)

New York

Ambulance
 Aquatic Plant Growth Control
 Beach Erosion Control
 Dock
 Drainage
 Fire Alarm
 Fire Protection
 Harbor Improvement
 Lighting
 Park
 Parking
 Public Dock
 Refuse & Garbage
 Sewage Disposal
 Sewer
 Sidewalk
 Snow Removal
 Water
 Water Aquasition & Storage
 Water Quality Treatment
 Water Storage & Distribution
 Water Suply
 Wastewater Disposal

Town Special Districts in New York: Background, Trends and Issues (state.ny.us)

Texas

Agricultural Development District
 Arts and Entertainment District
 County Assistance District
 County Development District
 Crime Control and Prevention District
 Drainage District
 Emergency Services District
 Fresh Water Supply District
 Groundwater Conservation District
 Groundwater Management Area
 Health Services District
 Homestead Preservation District
 Hospital District
 Independent School District
 Irrigation District
 Jail District
 Levee Improvement District
 Library District
 Mosquito Control District
 Multijurisdictional Library District
 Municipal Development District
 Municipal Management District
 Municipal Management District
 Municipal Utility District
 Navigation District
 Noxious Weed Control District
 Public Improvement District
 Regional District
 Road District
 Road Utility District
 Self-Liquidating Navigation District
 Special Utility District
 Sports and Community Venue District
 Sports Facility District
 Stormwater Control District
 Water Control and Improvement District
 Water Improvement District
 Wind Erosion District

Special-Purpose-Districts-copy.pdf (texaspolicy.com)

Washington

(Diking, Drainage, and Sewerage Improvement District)
 Agricultural Pest District
 Air Pollution Control Authority

Apportionment District (Community Redevelopment Act)
 Aquifer Protection Area
 Board of Joint Control (Irrigation districts and other entities)
 Cemetery District
 City Transportation Authority (Monorail)
 Community Facilities District
 Community Renewal Area
 Conservation District
 County Airport District
 County Ferry District
 County Public Transportation Authority
 County Rail District
 County Road District
 Cultural Arts, Stadium, and Convention District
 Diking District
 Diking or Drainage Improvement District
 Diking, Drainage, and Irrigation Improvement District (or Drainage and Irrigation Improvement District)
 Diking, Drainage, and Irrigation Improvement District (or Drainage and Irrigation Improvement District)
 Diking, Drainage, and Sewerage Improvement District
 Drainage District
 Emergency Medical Service District
 Fire Protection District
 Flood Control by Counties Jointly - 1913 Act (Intercounty)
 Flood Control District
 Flood Control Zone District
 Health District
 Horticultural Pest and Disease Board (Horticultural Assessment)
 Intercounty Diking and Drainage District
 Intercounty Rural Library District
 Intercounty Weed District
 Irrigation and Rehabilitation District
 Irrigation and Rehabilitation District
 Irrigation District
 Island Library District
 Joint City-County Housing Authority

Washington (cont.)

Joint Park and Recreation District
Lake and Beach Management District
Legal Authority (Hydroelectric) - Irrigation Districts
Library Capital Facility Area
Metropolitan Municipal Corporation
Metropolitan Municipal Corporation
Metropolitan Municipal Corporation
Metropolitan Municipal Corporation
Metropolitan Park District
Mosquito Control District
Mosquito Control District
Operating Agency (Electricity Generation and Distribution)
Park and Recreation District
Park and Recreation Service Area
Port District
Port District - Industrial Development District
Public Facilities District
Public Hospital Capital Facility Area
Public Hospital District
Public Housing Authority
Public Stadium Authority
Public Transportation Benefit Area
Public Utility District
Public Waterway District
Reclamation and Irrigation District in Reclamation Areas
Reclamation District of One Million Acres
Regional Fire Protection Service Authority
Regional Library
Regional Transit Authority
Regional Transportation Investment District
River and Harbor Improvement District
Road and Bridge Service District
Rural County Library District
Rural Partial Library District
Rural Public Hospital District
Sewerage Improvement District
Shellfish Protection District -

Solid Waste Collection District
Solid Waste Disposal District
Television Reception Improvement District
Transportation Benefit District
Unincorporated Transportation Benefit Area
Urban Emergency Medical Service District
Water-Sewer District (water-sewer district, water district, sewer district)
Weed District

MRSC - Types of Special Purpose Districts in Washington State

Wyoming

Airport joint powers boards
Cemetery districts
Conservation districts
Fire protection districts
Flood control districts
Hospital districts
Housing authorities
Improvement and service districts
Irrigation districts
Joint powers boards
Local improvement districts
Museum districts
Other districts as specified by law
Predator management districts
Public Irrigation & Power
Recreation districts
Recreation joint powers boards
Regional transportation authorities
Resort districts
Rural health care districts
Sanitary and improvement districts
Senior citizens' districts
Solid waste disposal districts
Water and sewer districts
Water conservancy districts
Watershed improvement districts
Weed and pest districts

Who We Are – Wyoming Association of Special Districts (wyospecialdistricts.com)

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