



STATE OF NEVADA
STATE BOARD OF EQUALIZATION

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February 12, 2010

Proposed Revisions to LCB File No. R153-09

Amendment to Section 10, add the following paragraph:

2. If the publication adopted by reference pursuant to subsection 1 is revised, the State Board will review the revision to determine its suitability for this State. If the State Board determines that the revision is not suitable for this State, the State Board will hold a public hearing to review its determination and give notice of that hearing within 30 days after the date of the publication of the revision. If, after the hearing, the State Board does not revise its determination, the State Board will give notice that the revision is not suitable for this State within 30 days after the hearing. If the State Board does not give such notice, the revision becomes part of the publication adopted by reference pursuant to subsection 1.

Purpose of the Revision: To provide a process for reviewing amendments and updates to the referenced document, Standard on Ratio Studies. The revision was requested by the Department at the workshop on February 11, 2010.

Amendment to Section 13:

Sec. 13. 2. *If the State Board desires a county assessor to provide any information pursuant to this section, the State Board will require the Department to send to the county assessor by regular mail a notice of the request which describes the information requested and the format and type of media in which the information is requested. The county assessor shall submit the information to the State Board in the format and type of media requested within 10 business days after the date of the postmark on the notice of the request. THE STATE BOARD MAY CONSIDER EXTENDING THE DUE DATE UPON REQUEST OF THE ASSESSOR.*

Purpose of the Revision: To allow an extension of time to the assessor to comply with requests for information from the State Board, if necessary. The revision was requested by county assessors at the workshop on February 11, 2010.

Amendment to Section 14:

Sec. 14. 1. *Upon the request of the State Board, the Department or county assessor shall perform and submit to the State Board any ratio study or other statistical analysis that the State Board deems*

appropriate to assist it in determining the quality and level of assessment of any class or group of properties in a county.

2. Each ratio study or other statistical analysis requested by the State Board pursuant to this section must:

(a) Be performed in accordance with the provisions of the Standard on Ratio Studies adopted by reference in section 10 of this regulation, except any specific provision of the Standard on Ratio Studies that conflicts or is inconsistent with the laws of this State or any regulations adopted by the State Board or the Commission.

(b) Identify the ~~[class or group of properties]~~ STATISTICAL POPULATION, that is the subject of the ratio study or statistical analysis, which may be divided into two or more ~~[categories]~~ STRATA according to neighborhood, age, type of construction or any other appropriate criterion or set of criteria.

(c) Include an adequate sampling of ~~[each category of property]~~ STRATA into which the ~~[class or group of properties]~~ STATISTICAL POPULATION that is the subject of the ratio study or statistical analysis is divided, and such statistical criteria as may be required, to indicate an accurate ratio of assessed value to taxable value and an accurate measure of equality in assessment.

Purpose of the revision: To properly refer to the terms “statistical population” and “strata” instead of “category” and “class.” The term statistical population is broader than class or group of properties, and means all the items of interest, for example, all the observations in a data set from which a sample may be drawn. The revision was requested by the Department at the workshop held on February 11, 2010.

Amendment to Section 16:

Sec. 16. 1. If the State Board, after considering the information described in section 12 of this regulation, makes a preliminary finding that any class or group of properties in this State was not assessed uniformly in accordance with the methods of appraisal and at the level of assessment required by law, the State Board will:

(a) Schedule a hearing concerning that preliminary finding on a date which is not less than 10 business days after the notice of the hearing is mailed pursuant to paragraph (b).

(b) Require the Department to send by registered or certified mail a notice of the hearing to the county clerk, county assessor, district attorney and chair of the county board of each county in which any of the property is located. A legal representative of the county may waive the receipt of such notice.

(c) Require the Secretary to provide a copy of the notice of the hearing to the Commission AND TO THE COUNTY BOARD OF COMMISSIONERS.

Amendment to Section 17:

Sec. 17. 2. If the State Board orders the reappraisal of a class or group of properties pursuant to this section, the State Board will:

(c) Require the Secretary to notify the Commission AND THE COUNTY BOARD OF COMMISSIONERS of the date, time and location of the hearing.

Amendment to Section 19:

Sec. 19. 1. The following persons shall appear at each hearing scheduled pursuant to section 16 or 17 of this regulation:

(a) The county assessor of each county in which any of property that is the subject of the hearing is located or a representative of the county assessor.

~~(b) [A representative of the board of county commissioners of each county in which any of the property that is the subject of the hearing is located.~~

——(e) | A representative of the county board of each county in which any of the property that is the subject of the hearing is located.

The purpose of the changes in sections 16, 17, and 19 is to remove the requirement that the county commissioners attend the hearing, but to keep them informed of the equalization process. The request for the revision was made by county assessors at the workshop held on February 11, 2010.

Additional Section:

Sec. 23. The effective date of these regulations shall be October 1, 2010.

The purpose of the new Section 23 is to not impose a new equalization process during the current fiscal year. The request for the revision was made by the Nevada Taxpayers Association.

**PROPOSED REGULATION OF THE
STATE BOARD OF EQUALIZATION**

LCB File No. R153-09

January 14, 2010

EXPLANATION – Matter in *italics* is new; matter in brackets ~~[omitted material]~~ is material to be omitted.

AUTHORITY: §§1-22, NRS 361.375 and 361.395.

A REGULATION relating to taxation; establishing procedures for the equalization of property valuations by the State Board of Equalization; and providing other matters properly relating thereto.

Section 1. Chapter 361 of NAC is hereby amended by adding thereto the provisions set forth as sections 2 to 21, inclusive, of this regulation.

Sec. 2. *As used in sections 2 to 21, inclusive, of this regulation, unless the context otherwise requires, the words and terms defined in sections 3 to 8, inclusive, of this regulation have the meanings ascribed to them in those sections.*

Sec. 3. *“County board” means a county board of equalization.*

Sec. 4. *“Equalize property valuations” means to ensure that the property in this State is assessed uniformly in accordance with the methods of appraisal and at the level of assessment required by law.*

Sec. 5. *“Interested person” means an owner of any relevant property, as indicated in the records of the county assessor of the county in which the property is located or, if the Commission establishes the valuation of the property, as indicated in the records of the Department.*

Sec. 6. *“Ratio study” means an evaluation of the quality and level of assessment of a class or group of properties in a county which compares the assessed valuation established by the county assessor for a sampling of those properties to:*

1. An estimate of the taxable value of the property by the Department or an independent appraiser; or

2. The sales price of the property,

↪ as appropriate.

Sec. 7. *“Secretary” means the Secretary of the State Board.*

Sec. 8. *“State Board” means the State Board of Equalization.*

Sec. 9. *The provisions of sections 2 to 21, inclusive, of this regulation govern the practice and procedure for proceedings before the State Board to carry out the provisions of NRS 361.395.*

Sec. 10. *The State Board hereby adopts by reference the Standard on Ratio Studies, July 2007 edition, published by the International Association of Assessing Officers. The Standard on Ratio Studies may be obtained from the International Association of Assessing Officers, 314 West 10th Street, Kansas City, MO 64105-1616, or on the Internet at <http://www.iaao.org/store>, for the price of \$10. A free copy of the Standard on Ratio Studies, July 2007 edition, may be obtained on the Internet at <http://www.iaao.org/uploads/RatioStd07.pdf>.*

Sec. 11. *1. During each annual session of the State Board, the State Board will hold one or more hearings to:*

(a) Review the tax roll of each county, as corrected by the county board;

(b) Determine whether the property in this State has been assessed uniformly in accordance with the methods of appraisal and at the level of assessment required by law;

(c) Determine whether the taxable values specified in the tax roll of any county must be increased or decreased to equalize property valuations in this State; and

(d) Take such additional actions as it deems necessary to carry out the provisions of NRS 361.395.

2. Subject to the time limitations specified in NRS 361.380, the State Board may adjourn its annual session from time to time until it has completed its duties pursuant to NRS 361.395 for the applicable fiscal year.

Sec. 12. *In determining whether the property in this State has been assessed uniformly in accordance with the methods of appraisal and at the level of assessment required by law, the State Board will consider:*

1. The tax roll of each county, as corrected by the county board and filed with the Secretary pursuant to NRS 361.390;

2. The central assessment roll prepared pursuant to NRS 361.3205;

3. The results of any relevant ratio study conducted by the Department pursuant to NRS 361.333;

4. The results of any relevant audit of the work practices of a county assessor performed by the Department pursuant to NRS 361.333 to determine whether a county has adequate procedures to ensure that all property subject to taxation is being assessed in a correct and timely manner;

5. Any relevant evidence submitted to a county board or the State Board pursuant to NRS 361.355;

6. *Any information provided to the State Board pursuant to sections 13, 14 and 15 of this regulation; and*

7. *Any other information the State Board deems relevant.*

Sec. 13. 1. *In addition to the information contained in the tax roll filed with the Secretary pursuant to NRS 361.390, a county assessor shall, upon the request of the State Board, provide any information the State Board deems necessary to carry out the provisions of NRS 361.395, including, without limitation:*

(a) The assessor's parcel number for any parcel of property.

(b) The taxable value and assessed value determined for any land, improvements or personal property before and after any adjustments to those values by the county board.

(c) The value per unit determined for any land or personal property before and after any adjustments to that value by the county board.

(d) Land use codes for the county.

(e) Market areas in the county.

(f) The year in which any improvements were built.

(g) The classification of quality for any improvements.

(h) The size of any improvements.

(i) The size of any lot.

(j) The zoning of any property.

(k) The date of the most recent sale of any property and the sales price of the property.

(l) Summary statistics concerning taxable values and assessed values for tax districts, market areas, neighborhoods and land use codes, including, without limitation, the applicable medians and modes.

2. If the State Board desires a county assessor to provide any information pursuant to this section, the State Board will require the Department to send to the county assessor by regular mail a notice of the request which describes the information requested and the format and type of media in which the information is requested. The county assessor shall submit the information to the State Board in the format and type of media requested within 10 business days after the date of the postmark on the notice of the request.

Sec. 14. *1. Upon the request of the State Board, the Department or county assessor shall perform and submit to the State Board any ratio study or other statistical analysis that the State Board deems appropriate to assist it in determining the quality and level of assessment of any class or group of properties in a county.*

2. Each ratio study or other statistical analysis requested by the State Board pursuant to this section must:

(a) Be performed in accordance with the provisions of the Standard on Ratio Studies adopted by reference in section 10 of this regulation, except any specific provision of the Standard on Ratio Studies that conflicts or is inconsistent with the laws of this State or any regulations adopted by the State Board or the Commission.

(b) Identify the class or group of properties that is the subject of the ratio study or statistical analysis, which may be divided into two or more categories according to neighborhood, age, type of construction or any other appropriate criterion or set of criteria.

(c) Include an adequate sampling of each category of property into which the class or group of properties that is the subject of the ratio study or statistical analysis is divided, and such statistical criteria as may be required, to indicate an accurate ratio of assessed value to taxable value and an accurate measure of equality in assessment.

3. The State Board will determine the appropriate time frame from which sales of property may be considered in any ratio study or statistical analysis requested pursuant to this section. If the State Board determines that the appropriate time frame is any period other than the 36 months immediately preceding July 1 of the year before the applicable lien date, the State Board will provide the reasons for that determination to the Department or county assessor.

4. The State Board will evaluate each ratio study and statistical analysis performed pursuant to this section to determine whether the ratio study or statistical analysis reliably indicates the quality and level of assessment for the applicable class or group of properties. In making that determination, the State Board will consider:

(a) Whether the Department or county assessor used a sufficient number of sales or appraisals in performing the ratio study or statistical analysis;

(b) Whether the samples of property selected by the Department or county assessor adequately represent the total makeup of the applicable class or group of properties;

(c) Whether the Department or county assessor correctly adjusted the samples of property for market conditions;

(d) Whether any variations among sales or appraisal ratios affect the reliability of the ratio study or statistical analysis; and

(e) Any other matters the State Board deems relevant.

Sec. 15. *Before making any determination concerning whether the property in a county has been assessed uniformly in accordance with the methods of appraisal required by law, the State Board will require the Department to:*

1. Conduct a systematic investigation and evaluation of the procedures and operations of the county assessor; and

2. Report to the State Board its findings concerning whether the county assessor has appraised the property in the county in accordance with the methods of valuation prescribed by statute and the regulations of the Commission.

Sec. 16. *1. If the State Board, after considering the information described in section 12 of this regulation, makes a preliminary finding that any class or group of properties in this State was not assessed uniformly in accordance with the methods of appraisal and at the level of assessment required by law, the State Board will:*

(a) Schedule a hearing concerning that preliminary finding on a date which is not less than 10 business days after the notice of the hearing is mailed pursuant to paragraph (b).

(b) Require the Department to send by registered or certified mail a notice of the hearing to the county clerk, county assessor, district attorney and chair of the county board of each county in which any of the property is located. A legal representative of the county may waive the receipt of such notice.

(c) Require the Secretary to provide a copy of the notice of the hearing to the Commission.

2. The notice of the hearing must state:

(a) The date, time and location of the hearing;

(b) The information on which the State Board relied to make its preliminary finding that the class or group of properties was not assessed uniformly in accordance with the methods of appraisal and at the level of assessment required by law; and

(c) The proposed order of the State Board.

3. The Department shall include with each notice provided pursuant to paragraph (b) of subsection 1, and upon the request of any interested person, provide to that person, a copy of any analysis or other information considered by the State Board in making its preliminary finding that the class or group of properties was not assessed uniformly in accordance with the methods of appraisal and at the level of assessment required by law.

Sec. 17. 1. *Upon the completion of a hearing scheduled pursuant to section 16 of this regulation, the State Board will issue:*

(a) An order stating that the State Board will take no action on the matter and specifying the reasons that no action will be taken;

(b) An order referring the matter to the Commission for the Commission to take such action within its jurisdiction as the Commission deems to be appropriate;

(c) An order requiring the reappraisal by the county assessor of a class or group of properties in a county; or

(d) Except as otherwise provided in this paragraph, if a ratio study or other statistical analysis performed pursuant to NRS 361.333 or section 14 of this regulation indicates with a confidence level of at least 95 percent that the median assessment ratio for any class or group of properties is less than 32 percent or more than 36 percent, an order increasing or decreasing the assessed valuation of that class or group of properties by such a factor as the State Board deems to be appropriate to cause the median assessment ratio to be not less than 32 percent and not more than 36 percent. The State Board will not issue such an order if the application of the factor would cause the coefficient of dispersion calculated for the class or group of properties to fail to meet the recommendations set forth in the Standard on Ratio Studies adopted by reference in section 10 of this regulation.

2. If the State Board orders the reappraisal of a class or group of properties pursuant to this section, the State Board will:

(a) Schedule an additional hearing to determine whether to issue an order:

(1) Stating that the State Board will take no further action on the matter and specifying the reasons that no further action will be taken;

(2) Referring the matter to the Commission for the Commission to take such action within its jurisdiction as the Commission deems to be appropriate; or

(3) Increasing or decreasing the taxable valuation of the class or group of properties in accordance with the reappraisal or in such other manner as the State Board deems appropriate to equalize property valuations.

(b) Require the Department to send by registered or certified mail, not less than 10 business days before the date of the additional hearing, notice of the date, time and location of the hearing to the county clerk, county assessor, district attorney and chair of the county board of the county in which the property is located. A legal representative of the county may waive the receipt of such notice.

(c) Require the Secretary to notify the Commission of the date, time and location of the hearing.

3. Each order issued pursuant to this section must include a statement of any pertinent findings of fact made by the State Board. If the State Board issues an order pursuant to this section:

(a) Requiring the reappraisal of a class or group of properties, the order must specify:

(1) The class or group of properties affected;

(2) The purpose and objectives of the reappraisal; and

(3) The procedures required for the reappraisal, including the particular methods of appraisal prescribed by the regulations of the Commission.

(b) Increasing or decreasing the valuation of any class or group of properties, the order must specify:

(1) The class or group of properties affected; and

(2) The amount of or the formula to be used to calculate the amount of that increase or decrease.

4. Upon the issuance of any order pursuant to this section:

(a) The Department shall send a copy of the order:

(1) By certified mail to the county assessor of each affected county; and

(2) By regular mail to the county clerk and chair of the county board of each affected county; and

(b) The Secretary shall provide:

(1) A copy of the order to the Commission; and

(2) Any certification and notice required to carry out the provisions of NRS 361.405.

5. As used in this section, "assessment ratio" means the ratio of assessed value to taxable value.

Sec. 18. 1. *The State Board will require the Department to place on the Internet website maintained by the Department, not less than 10 business days before the date of each hearing scheduled pursuant to section 16 or 17 of this regulation, a copy of the notice of the hearing and of the agenda for the meeting at which the State Board will conduct the hearing.*

2. If the State Board proposes to issue an order increasing the valuation of any class or group of properties at any hearing scheduled pursuant to section 16 or 17 of this regulation,

the State Board will require the Department to provide to each interested person the notice of the hearing required by subsection 2 of NRS 361.395. If the notice is not provided to an interested person by personal service and the mailing address of that person is not available, the Department must send the notice of the hearing by registered or certified mail to the address of the relevant property or, if the interested person has designated a resident agent pursuant to chapter 77 of NRS, the address of that resident agent as it appears in the records of the Secretary of State. For the purposes of subsection 2 of NRS 361.395, the State Board construes the term “interested person” to have the meaning ascribed to it in section 5 of this regulation.

Sec. 19. 1. *The following persons shall appear at each hearing scheduled pursuant to section 16 or 17 of this regulation:*

(a) The county assessor of each county in which any of property that is the subject of the hearing is located or a representative of the county assessor.

(b) A representative of the board of county commissioners of each county in which any of the property that is the subject of the hearing is located.

(c) A representative of the county board of each county in which any of the property that is the subject of the hearing is located.

2. *At each hearing scheduled pursuant to section 16 or 17 of this regulation:*

(a) The State Board will receive testimony under oath from interested persons.

(b) The county assessor or his or her representative, the representative of the board of county commissioners and the representative of the county board may:

(1) Provide additional information and analysis in support of or in opposition to any proposed order of the State Board; and

(2) Show cause why the State Board should not increase or decrease the valuation, or require a reappraisal, of the pertinent class or group of properties in the county.

3. A hearing scheduled pursuant to section 16 or 17 of this regulation may be held by means of a video teleconference between two or more locations if the video technology used at the hearing provides the persons present at each location with the ability to hear and communicate with the persons present at each other location.

4. The presiding member of the State Board may exclude any disruptive person from the hearing room.

Sec. 20. *If the State Board orders any increase or decrease in the valuation of any property in a county pursuant to section 17 of this regulation:*

1. The county assessor of the county shall, on or before June 30 immediately following the issuance of the order or such a later date as the State Board may require, file with the Department the assessment roll for the county, as adjusted to carry out that order; and

2. The Department shall, on or before August 1 immediately following the issuance of the order or such a later date as the State Board may require:

(a) Audit the records of the county assessor of the county to the extent necessary to determine whether that order has been carried out; and

(b) Report to the State Board its findings concerning whether the county assessor has carried out that order.

Sec. 21. *The State Board may reconsider any order issued pursuant to section 17 of this regulation in the manner provided in NAC 361.7475, except that:*

1. A petition for reconsideration must be filed with the Secretary within 5 business days after the date on which the order was mailed to the petitioner; and

2. If the State Board takes no action on the petition within 10 business days after the date the petition was filed with the Secretary, the petition shall be deemed to be denied.

Sec. 22. NAC 361.682 is hereby amended to read as follows:

361.682 1. The provisions of NAC 361.682 to 361.753, inclusive:

(a) Govern the practice and procedure in contested cases before the State Board.

(b) *Except where inconsistent with the provisions of sections 2 to 21, inclusive, of this regulation, apply to proceedings before the State Board to carry out the provisions of NRS 361.395.*

(c) Will be liberally construed to secure the just, speedy and economical determination of all issues presented to the State Board.

2. In special cases, where good cause appears, not contrary to statute, deviation from these rules, if stipulated to by all parties of record, will be permitted.

Standard on Ratio Studies

Approved July 2007

INTERNATIONAL ASSOCIATION OF ASSESSING OFFICERS

The assessment standards set forth herein represent a consensus in the assessing profession and have been adopted by the Executive Board of the International Association of Assessing Officers. The objective of these standards is to provide a systematic means by which concerned assessing officers can improve and standardize the operation of their offices. The standards presented here are advisory in nature and the use of or compliance with such standards is purely voluntary. If any portion of these standards is found to be in conflict with the Uniform Standards of Professional Appraisal Practice (USPAP) or state laws, USPAP and state laws shall govern.

Acknowledgements

This revision of the 2007 *Standard on Ratio Studies* was begun in 2004. At the time of the adoption by the IAAO Executive Board, the IAAO Technical Standards Committee was composed of Peter L. Davis, chair; Alan S. Dornfest, AAS; A. William Marchand; R. Scot McAlpine; William M. Wadsworth and Gary J. McCabe, CAE, associate member.

Substantial help and guidance with this revision was provided by the ad hoc Ratio Study Technical Advisory Subcommittee. Special thanks go to Robert C. Denne; George A. Donatello, CMS; Robert J. Gloude-mans; Al Mobley, CAE, AAS; Ronald J. Schultz; William J. Smith; Nancy C. Tomberlin; Ronald L. Wasserstein; Elbert B. Whorton; and Tim S. Wooten.

The standard benefited from the support, recommendations and thorough review of many others. In particular the committee would like to thank Richard Almy; Sheila M. Anderson; Debra Asbury; Stephen L. Baker, CAE; Wade E. Barber, CAE; Robert M. Boley, AAS; John Boyce, CAE; Barry D. Couch, CAE; Edward A. Crapo, AAS; Margaret Cusack, AAS; Dennis Donner; Glenn W. Fisher; Karen Fullhart; Steve Gardner; Adam Gold; Brian Guerin; H. Neil Hester; J. Mark Hixon; Lillian Johnson, CAE; Marion R. Johnson, CAE; Dennis B. Kearbey, CAE; Mark R. Linné, CAE; Wayne D. Llewellyn, CAE; Willard F. Martin; Carl Maulsby; Derrick Niederklein; Robert E. Norris; Patrick M. O'Connor; Pamela Carlisle-Oliver; Elizabeth Pearson; John F. Ryan, CAE; David R. Sherrill, CAE; Rick Stuart, CAE; James F. Todora, CAE; Kenneth C. Uhrich; Dave Williams; and Bruce Woodzell.

Published by
International Association of Assessing Officers
314 W 10th St
Kansas City, Missouri 64105-1616

816/701-8100
Fax: 816/701-8149
<http://www.iaao.org>

ISBN 978-0-88329-187-0
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Printed in the United States of America.

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Standard on Ratio Studies

Part 1. Guidance for Local Jurisdictions

This standard comprises two major parts. Part 1 focuses on the needs of local assessors. Part 2 presents guidelines for oversight agencies that use ratio studies for equalization and appraisal performance monitoring. The Definitions section explains the terms used in this standard. The appendixes present many technical issues in greater detail. More information on many topics addressed in this standard can be found in Property Appraisal and Assessment Administration (IAAO 1990, chapter 20) and in Gloude-mans (1999, chapter 5).

1. Scope

This part of the standard provides recommendations on the design, preparation, interpretation, and use of ratio studies for the real property quality assurance operations of an assessor's office. Quality assurance/control measures include data integrity review, assessment level and uniformity analysis, and computer-assisted mass appraisal (CAMA) system performance testing, among others.

Assessors may have the opportunity to utilize ratio study information at a greater depth than oversight agencies. These internal studies can help improve appraisal methods or identify areas within the jurisdiction that need attention. External ratio studies conducted by oversight agencies (Part 2) focus more upon testing the assessor's past performance in a few broad property categories.

2. Overview

For local jurisdictions, *ratio study* is used as a generic term for sales-based studies designed to evaluate appraisal performance. The term is used in preference to the term *assessment ratio study* because use of assessments can mask the true level of appraisal and confuse the measurement of appraisal uniformity when the legal assessment level is other than 100 percent of fair market value.

2.1 The Concepts of Market Value and Appraisal Accuracy

Market value is the major focus of most mass appraisal assignments. The major responsibility of assessing officers is estimating the market value of properties based on legal requirements or accepted appraisal definitions. The viability of the property tax depends largely on the accuracy of such value estimates. The accuracy of appraisals made for assessment purposes is therefore of concern, not only to assessors but also to taxing authorities, property taxpayers, and elected representatives. Appraisal accuracy refers to the degree to which properties are appraised at

market value, as defined by professional standards (see *Glossary for Property Appraisal and Assessment* [IAAO 1997]) and legal requirements. While a single sale may provide an indication of the market value of the property in question, it cannot form the basis for a ratio study, which provides information about the market values of groups of properties. Dividing the appraised value by the sale price forms the ratios. The ratio can be multiplied by 100 and expressed as a percentage.

Market value is a concept in economic theory and cannot be observed directly. However, market values can be represented in ratio studies by sales prices (market prices) that have been confirmed, screened, and adjusted as necessary (see Appendix A, "Sales Validation Guidelines"). Sales prices provide the most objective estimates of market values and under normal circumstances should provide good indicators of market value.

2.2 Aspects of Appraisal Performance

There are two major aspects of appraisal accuracy: level and uniformity. Appraisal level refers to the overall ratio of appraised values to market values. Level measurements provide information about the degree to which goals or certain legal requirements are met. Uniformity refers to the degree to which properties are appraised at equal percentages of market value.

2.3 Uses of Ratio Studies

Key uses of ratio studies are as follows:

- measurement and evaluation of the level and uniformity of mass appraisal models
- internal quality assurance and identification of appraisal priorities
- determination of whether administrative or statutory standards have been met
- determination of time trends
- adjustment of appraised values between reappraisals

Assessors, appeal boards, taxpayers, and taxing authorities can use ratio studies to evaluate the fairness of funding distributions, the merits of class action claims, or the degree of discrimination (see Appendix F). However, ratio study statistics cannot be used to judge the level of appraisal of an *individual* parcel. Such statistics can be used to adjust assessed values on appealed properties to the common level.

2.4 Applicability

Local jurisdictions should use ratio studies as a primary mass appraisal testing procedure and their most important performance analysis tool. The ratio study can assist such jurisdictions in providing fair and equitable assessment of all property. **Ratio studies provide a means for testing and evaluating mass appraisal valuation models to ensure that value estimates meet attainable standards of accuracy;** see *Uniform Standards of Professional Appraisal Practice (USPAP) Standard Rule 6-6* (Appraisal Foundation 2006). Ratio study reports are typically included as part of the written documentation used to communicate results of a mass appraisal and to comply with *Standard Rule 6-7(b)*. Ratio studies also play an important role in judging whether constitutional uniformity requirements are met. Compliance with state or provincial performance standards should be verified by the local jurisdiction before value notices are sent to property owners.

3. Steps in Ratio Studies

Ratio studies generally involve the seven basic steps listed below.

1. define the purpose, scope and objectives
2. design
3. stratification
4. collection and preparation of market data
5. matching of appraisal and market data
6. statistical analysis
7. evaluation and use of results

3.1 Definition of the Purpose, Scope, and Objectives

The first step in any ratio study is to determine and state clearly the reasons for the study. This crucial step of identifying the purpose of the study determines the specific goals, scope, content, depth, and required flexibility.

3.2 Design

In the design of the study the assessor must consider the quantity of sale data and the resources available for conducting the ratio study. Although absolute accuracy cannot be ensured, all reasonable, cost-effective steps should be taken to maximize reliability.

The assessor should identify the following factors:

- the groups or classes of properties to be included in the study
- important legal, physical, and economic characteristics of the properties selected for study
- the quantity and quality of data available

- the values being tested and sales period being used
- available resources, such as the number and expertise of staff, computer hardware and software applications, and additional limiting conditions

3.2.1 Level of Sophistication and Detail

A basic design principle is to keep the study as simple as possible while consistent with its purpose. Ratio studies are not all alike and should be tailored to an intended use.

Data analysis has been made easier through computerization. Although every study does not require the same level of statistical detail, each ratio study should include measures of appraisal level, appraisal uniformity, and statistical reliability. Graphs, charts, or other pictorial representations can be useful tools for showing distributions and patterns in the data. There is no model ratio study design that can serve all jurisdictions or all situations equally well. Informed, reasoned judgment and common sense are required in the design of ratio studies.

3.2.2 Sampling

A ratio study is a form of applied statistics, because the analyst draws conclusions about the appraisal of the population (the entire jurisdiction) of properties based only on those that have sold during a given time period. The sales ratios constitute the sample that will be used to draw conclusions or inferences about the population.

To determine the accuracy of appraisals with absolute certainty, it would be necessary for all properties in the population to have been sold in arm's-length, open-market transfers near the appraisal date. Since this is not possible, ratio studies must use samples and draw inferences or conclusions about the population from these samples.

The number of parcels in the population (the jurisdiction or stratum) is not an important determinant of a statistically valid and reliable sample.

3.2.2.1 Limitations of Sale Samples

Users of sales ratio studies should be aware of the following cautions associated with use of sale samples:

- Sales are not “randomly selected” from the population, in the strict technical sense (see section 4.5, Sample Representativeness).
- Value-related characteristics of a sale sample may not represent all the value-related characteristics of the population.
- Adjustments to sale prices may be difficult to support or may be subjective.

3.2.2.2 Data Accuracy and Integrity

The findings of a ratio study can only be as accurate as the

data used in the study. Personnel involved in collecting, screening, and adjusting sales data or making appraisals should be familiar with real estate conveyance practices in their region. They also should be proficient in the principles and practices of real estate appraisal and understand local market conditions.

Accuracy and integrity of data entered into or transferred through computer systems must be ensured. Design of computer programs should make it easy to verify data accuracy. Query tools should be accessible to users, so that data can be verified easily. Methods for checking the accuracy of assigned strata (such as school district, city, neighborhood, and category) as well as of assessed or appraised value, sale price, parcel identifier, and other fields must be established to reduce these and other nonsampling errors.

3.3 Stratification

Stratification divides all the properties within the scope of the study into two or more groups or strata. Stratification facilitates a more complete and detailed picture of appraisal performance and can enhance sample representativeness.

Each type of property subject to a distinct level of assessment could constitute a stratum. Other property groups, such as neighborhoods and age and size ranges, could constitute additional strata.

When the purpose of the study is to evaluate appraisal quality, flexibility in stratification is essential. The general goal is to identify areas in which the assessment levels are too low or lack uniformity and property groups for which additional reappraisal work may be required. In such cases, it also is highly desirable to stratify on the basis of more than one characteristic simultaneously.

Stratification can help identify differences in level of appraisal between property groups. In large jurisdictions, stratification by geographic areas is generally more appropriate for residential properties, while stratification of commercial properties by either geographic area or property subtypes (e.g., office, retail, and warehouse/industrial) can be more effective.

3.4 Collection and Preparation of Market Data

The reliability of a ratio study depends in part on how well the sales used in the study reflect market values. The underlying principle for review of sales data is to optimize the sample size, but at the same time to exclude sales that provide invalid indicators of market value. A ratio study sample with fewer than five sales tends to have exceptionally poor reliability and is not very useful.

3.5 Matching of Appraisal and Market Data

The physical and legal characteristics of each property used

in the ratio study must be the same as when sold. This implies two essential steps. First, the appraiser must ascertain whether the property descriptions match. If a parcel is split between the appraisal date and the sale date, a sale of any of its parts should not be used in the ratio study.

Second, the appraiser must ascertain whether the property rights transferred, the permitted use, and the physical characteristics of the property on the date of assessment are the same as those on the date of sale. If the physical characteristics of the property have changed since the last appraisal, adjustments may be necessary before including the property in a ratio study. Properties with significant differences in these factors should be excluded from the ratio study.

When statutory constraints are imposed on appraisal methods, the resulting assessment may be less than market value. In such cases a sales ratio study may not provide useful performance information. Constraints typically apply to land that qualifies for agricultural use value, subsidized housing, mineral land, and timberland.

3.6 Statistical Analysis

After a ratio is computed for each parcel in the study, measures of appraisal level, uniformity, and reliability for the entire jurisdiction and each group or stratum should be computed. The sample also could undergo exploratory data analysis to reveal patterns or features of the data (Hoaglin, Mosteller, and Tukey 1983).

3.7 Evaluation and Use of Results

A properly designed ratio study is a powerful tool for analyzing appraisal performance, evaluating CAMA system models, and suggesting strategies for improvement. A ratio study also can identify weaknesses in appraisal system performance. Unexpected study results may indicate a need to respecify or recalibrate an appraisal model or to reevaluate the data elements used in the valuation process. However, users of ratio studies should recognize the inherent limitations of this tool, as follows:

1. A ratio study cannot provide perfect information about appraisal performance. Lack of sufficient sales or overrepresentation of one geographic area or type of property can distort results.
2. Ratio study validity requires that sold and unsold parcels be appraised at the same level and in the same manner. Violation of this condition seriously undermines the validity of the study.
3. Findings should be used only in ways that are consistent with the intended use(s) for which the study was designed.
4. Ratio study data are subject to statistical sampling errors and other processing (nonsampling) errors (see Lessler and Kalsbeek), but these limitations

do not invalidate their use for informed decision-making.

4. Timing and Sample Selection

4.1 Data Requirements and Availability

The availability of data influences the design of the study and can call for revisions in the objectives of the study, limit the usefulness of the calculated statistics, or both.

4.1.1 Nature of the Population

The type of properties, market conditions, and composition of the population in terms of age, size, and value range are essential to the proper design of the study and interpretation of the results. Very large properties that rarely sell (e.g., a large power plant) can be ignored in a ratio study designed to evaluate local appraisal performance.

4.1.2 Assessment Information

Appraised values are the numerators in the ratios used in a ratio study. Information about appraisal dates, legal requirements concerning reappraisals, the dates on which the appraisals were originally set, and the period they remained in effect is required for establishing the date of analysis.

4.1.3 Indicators of Market Value

Sale price, as an indicator of market value, is the denominator in the calculation of the ratio. Specific information about the date, amount, terms, and conditions of a sale is required for proper analysis.

4.1.4 Property Characteristics

Information on property characteristics is crucial for determining whether property that was assessed is essentially the same as what was sold. Data for both sold and unsold properties should be current, relevant, and collected in a consistent manner.

4.2 Frequency of Ratio Studies

The purpose of a ratio study dictates how often it should be conducted. Regardless of the reappraisal cycle, ratio studies made by assessors should be conducted at least annually. This frequency enables potential problems to be recognized and corrected before they become serious.

When there is a revaluation, assessors should conduct at least four ratio studies to establish the following:

1. a baseline of current appraisal performance
2. preliminary values so that any major deficiency can be corrected
3. values used in assessment notices sent to taxpayers
4. final values after completion of the first, informal phase of the appeals process

The final study can be used in planning for the following year. In addition, ratio studies can be conducted as needed to evaluate appraisal procedures, investigate a discrimination complaint, or answer a specific question.

4.3 Date of Analysis

The date of analysis depends on the purpose of the study, but generally is the assessment date of the tax year being studied, which can be the current, the next, or a past year. The assessment date of the next tax year should be used when the purpose of the study is to evaluate preliminary values in a reappraisal.

4.4 Period from Which Sales Are Drawn

This period depends on the purpose of the study and on sales activity. In general, the period should be as short as possible and, ideally, no more than one year. A longer period may be required to produce a representative sample for some strata within a jurisdiction.

To develop an adequate sample size, the sales used in ratio studies can span a period of as long as five years provided there have been no significant economic shifts or changes to property characteristics and sales prices have been adjusted for time as necessary.

4.5 Sample Representativeness

In general, a ratio study is valid to the extent that the sample is sufficiently *representative* of the population.

The distribution of ratios in the population cannot be ascertained directly and appraisal accuracy can vary from property to property. By definition, a ratio study sample would be representative when the distribution of ratios of properties in the sample reflects the distribution of ratios of properties in the population. Representativeness is improved when the sample proportionately reflects major property characteristics present in the population of sold and unsold properties. As long as sold and unsold parcels are appraised in the same manner and the sample is otherwise representative, statistics calculated in a sales ratio study can be used to infer appraisal performance for unsold parcels.

However, if parcels that sell are selectively reappraised based on their sale prices and if such parcels are in the ratio study, uniformity inferences will not be accurate (appraisals appear more uniform than they are). In this situation, measures of appraisal level also will not be supportable unless similar unsold parcels are appraised by a model that produces the same overall percentage of market value (appraisal level) as on the parcels that sold (see Appendix D, "Sales Chasing Detection Techniques"). Assessing officials must incorporate a quality control program; including checks and audits of the data, to ensure that sold and unsold parcels are appraised at the same level.

Operationally, representativeness is improved when the following occur:

1. Appraisal procedures used to value the sample parcels are similar to procedures used to value the corresponding population
2. Accuracy of recorded property characteristics data for sold property does not differ substantially from that of unsold property,
3. Sample properties are not unduly concentrated in certain areas or types of property whose appraisal levels differ from the general level of appraisal in the population
4. Sale prices provide valid indicators of market value.

The first requirement generally is met unless sampled parcels are valued or updated differently from nonsampled parcels, or unless appraisals of sample parcels were done at a different time than appraisals of nonsampled parcels. For example, it is unlikely that the sample is representative of unsold parcels when the sample consists mostly of new construction, first-time sales of improved properties, condominium conversions, or newly platted lots.

The second requirement is met only if value-related property characteristics are updated uniformly for all property in a class as opposed to being updated only upon sale.

The third requirement relates to the extent to which appraisal performance for the sample reflects appraisal performance for the population.

The fourth requirement generally is met when the sales to be used in the sample are properly screened, adjusted if necessary, and validated.

4.6 Acquisition and Validation of Sales Data

Sales data are important in ratio studies and play a crucial role in any credible and efficient mass appraisal system. In some instances, it may be necessary to make adjustments to sales prices so they are more representative of the market. When there is more than one sale of the same property during a study period, only one of the transactions should be used in the ratio study. For guidelines on sales validation see Appendix A.

5. Ratio Study Statistics and Analyses

Once data have been properly collected, reviewed, assembled, and adjusted, outlier handling and statistical analysis can begin. This process involves the following steps.

1. A ratio should be calculated for each observation in the sample by dividing the appraised (or assessed) value by the sale price.
2. Graphs and exhibits can be developed that show the distribution of the ratios.

3. Exploratory data analysis, including outlier labeling/identification, and tests of the hypotheses of normality may be conducted.
4. Ratio study statistics of both appraisal level and uniformity should be calculated.
5. Reliability measures should be calculated.

An example of a ratio study statistical analysis report is given in table 1-1.

5.1 Data Displays

Displays or exhibits that provide a profile or picture of ratio study data are useful for illustrating general patterns and trends, particularly to nonstatisticians. The particular form of the displays, as well as the data used (e.g., sales prices, sales ratios, and property characteristics) depends on the purposes of the particular display. Types of displays useful in ratio studies are arrays, frequency distributions, histograms, plots, and maps (Gloude-mans 1999).

Graphic displays can be used to

- indicate whether a sample is sufficiently representative of the properties in a stratum
- indicate the degree of nonnormality in the distribution of ratios
- depict the overall level of appraisal
- depict the degree of uniformity
- depict the degree of value bias (regressivity or progressivity)
- compare the level of appraisal or degree of uniformity among strata
- detect outlier ratios
- identify specific opportunities to improve mass appraisal performance
- track performance measures over time

5.2 Outlier Ratios

Outlier ratios are very low or high ratios as compared with other ratios in the sample. The validity of ratio study statistics used to make inferences about population parameters could be compromised by the presence of outliers that distort the statistics computed from the sample. One extreme outlier can have a controlling influence over some statistical measures. However, some statistical measures, such as the median ratio, are resistant to the influence of outliers and trimming would not be required. Although the coefficient of dispersion (COD) is affected by extreme ratios, it is affected to a lesser extent than the coefficient of variation (COV) and the mean. The price-related differential (PRD) and weighted mean are sensitive to sales with high prices even if the ratios on higher priced sales do not appear unusual relative to other sales.

Table 1-1. Example of Ratio Study Statistical Analysis Data Analyzed

Rank of ratio of observation	Appraised value (\$)	Sale Price (\$)	Ratio (AV/SP)
1	48,000	138,000	0.348
2	28,800	59,250	0.486
3	78,400	157,500	0.498
4	39,840	74,400	0.535
5	68,160	114,900	0.593
6	94,400	159,000	0.594
7	67,200	111,900	0.601
8	56,960	93,000	0.612
9	87,200	138,720	0.629
10	38,240	59,700	0.641
11	96,320	146,400	0.658
12	67,680	99,000	0.684
13	32,960	47,400	0.695
14	50,560	70,500	0.717
15	61,360	78,000	0.787
16	47,360	60,000	0.789
17	58,080	69,000	0.842
18	47,040	55,500	0.848
19	136,000	154,500	0.880
20	103,200	109,500	0.942
21	59,040	60,000	0.984
22	168,000	168,000	1.000
23	128,000	124,500	1.028
24	132,000	127,500	1.035
25	160,000	150,000	1.067
26	160,000	141,000	1.135
27	200,000	171,900	1.163
28	184,000	157,500	1.168
29	160,000	129,600	1.235
30	157,200	126,000	1.248
31	99,200	77,700	1.277
32	200,000	153,000	1.307
33	64,000	48,750	1.313
34	192,000	144,000	1.333
35	190,400	141,000	1.350
36	65,440	48,000	1.363

Note: Due to rounding, totals may not add to match those on following table, which reports results of statistical analysis of above data.

Results of statistical analysis

Statistic	Result
Number of observations in sample	36
Total appraised value	\$3,627,040
Total sale price	\$3,964,620
Average appraised value	\$100,751
Average sale price	\$110,128
Mean ratio	0.900
Median ratio	0.864
Weighted mean ratio	0.915
Price-related differential (PRD)	0.98
Coefficient of dispersion (COD)	29.8%
95% median two-tailed confidence interval	(0.684, 1.067)
95% weighted mean two-tailed confidence interval	(0.806, 1.024)
Normal distribution of ratios (0.05 level of significance)	Reject – D’Agostino Pearson K^2 & Shapiro-Wilk W
Date of analysis	9/99/9999
Category or class being analyzed	Residential

Outlier ratios can result from any of the following:

1. an erroneous sale price
2. a nonmarket sale
3. unusual market variability
4. a mismatch between the property sold and the property appraised
5. an error in the appraisal of an individual parcel
6. an error in the appraisal of a subgroup of parcels
7. any of a variety of transcription or data handling errors

In preparing any ratio study, outliers should be

1. identified
2. scrutinized to validate the information and correct errors
3. trimmed if necessary to improve sample representativeness

For guidelines on outlier identification and trimming, see Appendix B, “Outlier Trimming Guidelines.”

5.3 Measures of Appraisal Level

Estimates of appraisal level are based on measures of central tendency. They should be calculated for each stratum and for such aggregations of strata as may be appropriate. **Several common measures of appraisal level (central tendency) should be calculated in ratio studies, including the median ratio, mean ratio, and weighted mean ratio.** When one of these measures is calculated on the data in a sample, the result is a point estimate, which is accurate for the sample but is only one indicator of the level of appraisal in the population. **Confidence intervals around the measures of level provide indicators of the reliability of the sample statistics as predictors of the overall level of appraisal of the population.** Note that noncompliance with appraisal level standards cannot be determined without the use of confidence intervals or hypothesis tests.

5.3.1 Median

The median ratio is the middle ratio when the ratios are arrayed in order of magnitude. If there is an even number of ratios, the median is the average of the two middle ratios.

The median always divides the data into two equal parts and is less affected by extreme ratios than the other measures of central tendency. Because of these properties, the median is the generally preferred measure of central tendency for evaluating overall appraisal level, determining reappraisal priorities, or evaluating the need for a reappraisal.

5.3.2 Arithmetic Mean

The arithmetic mean (aka mean or average) ratio is the average of the ratios. It is calculated by summing the

ratios and dividing by the number of ratios. In a normal distribution the mean equals the median. In a distribution skewed to the right (typical of ratio study data), the mean is greater than the median. The mean is affected more by extreme ratios than the median.

5.3.3 Weighted Mean

The weighted mean ratio is the value-weighted average of the ratios in which the weights are proportional to the sales prices. The weighted mean also is the ratio of the average assessed value to the average sales price value. **The weighted mean gives equal weight to each dollar of value in the sample, whereas the median and mean give equal weight to each parcel.** The weighted mean is an important statistic in its own right and also is used in computing the PRD, a measure of uniformity between high- and low-value properties

The weighted mean also can be calculated by (1) summing the appraised values, (2) summing the sales prices, and (3) dividing the first result by the second. The weighted mean also is called the *aggregate ratio*.

5.3.4 Contrasting Measures of Appraisal Level

Because it gives equal weight to each ratio and is unaffected by extreme ratios, the median is the preferred measure of central tendency for evaluating appraisal performance. Although the mean ratio is also a parcel-based measure, it can be affected appreciably by extreme ratios and can be relied upon only if the sample is of adequate size and contains few outliers.

5.4 Measures of Variability

Measures of dispersion or variability relate to the uniformity of the ratios and should be calculated for each stratum in the study. In general, the smaller the measure, the better the uniformity, but extremely low measures can signal one of the following:

acceptable causes

- extremely homogeneous properties
- very stable markets

unacceptable causes

- lack of quality control
- calculation errors
- poor sample representativeness
- sales chasing

Note that as market activity changes or as the complexity of properties increases, the measures of variability usually increase, even though appraisal procedures may be equally valid.

5.4.1 Coefficient of Dispersion

The most generally useful measure of variability or uniformity is the COD. The COD measures the average percentage deviation of the ratios from the median ratio and is calculated by the following steps:

1. subtract the median from each ratio
2. take the absolute value of the calculated differences
3. sum the absolute differences
4. divide by the number of ratios to obtain *the average absolute deviation*
5. divide by the median
6. multiply by 100

The COD has the desirable feature that its interpretation does not depend on the assumption that the ratios are normally distributed. In general, more than half the ratios fall within one COD of the median. The COD should not be calculated about the mean ratio.

5.4.2 Other Measures of Variability

Other useful measures of variability or the distribution of ratio study data are as follows:

- range
- percentiles
- quartiles
- interquartile range
- median absolute deviation (MAD)
- median percent deviation
- coefficient of concentration
- standard deviation
- coefficient of variation (COV)
- weighted coefficient of dispersion
- weighted coefficient of variation

See *Property Appraisal and Assessment Administration* (IAAO 1990, chapter 20) and Gloudemans (1999, chapter 5) for further discussion on these statistical measures.

Note that the typical percentage error is not the COD, but is expressed by the median percentage deviation statistic. Also, it is the interquartile range, not the COD, that brackets the middle 50 percent of the assessment ratios.

5.5 Measures of Reliability

Reliability, in a statistical sense, concerns the degree of confidence that can be placed in a calculated statistic for a sample. (For example, how precisely does the sample median ratio approximate the population median appraisal

ratio?) The primary measure of importance to the local assessor is the confidence interval. A confidence interval consists of two numbers (upper and lower limits) that bracket a calculated measure of central tendency for the sample; there is a specified degree of confidence that the calculated upper and lower limits bracket the true measure of central tendency for the population. See Appendix 20-4 in *Property Appraisal and Assessment Administration* (IAAO 1990) and Appendix C for guidelines on calculating small-sample confidence intervals.

New computer-intensive statistical methods, such as the “bootstrap” (Efron and Tibshirani 1993), now enable the development of confidence interval estimates for any statistic of interest, including measures of level and uniformity.

Measures of reliability explicitly take into account the errors inherent in a sampling process. In general, these measures are tighter (better) when samples are relatively large and the uniformity of ratios is relatively good.

Measures of reliability indicate whether there is a desired degree of confidence that a given level of appraisal has not been achieved. This does not mean that an appraiser should tolerate measures of central tendency that fail to meet goals whenever measures of reliability are wide due to small samples, poor uniformity, or both. Such cases require either additional data for proper analysis or alternative action, such as a reappraisal, if poor uniformity is the cause. Such correction might include reappraisal, trending of strata, and respecifying or recalibrating mass appraisal models (see section 9 in this part for a discussion of ratio study standards).

5.6 Vertical Inequities

The measures of variability discussed in section 5.4 relate to “horizontal,” or random, dispersion among the ratios in a stratum, regardless of the value of individual parcels. Another form of inequity can be systematic differences in the appraisal of low- and high-value properties, termed “vertical” inequities. When low-value properties are appraised at greater percentages of market value than high-value properties, assessment *regressivity* is indicated. When low-value properties are appraised at smaller percentages of market value than high-value properties, assessment *progressivity* is the result. Appraisals made for tax purposes of course should be neither regressive nor progressive.

An index statistic for measuring vertical equity is the PRD, which is calculated by dividing the mean ratio by the weighted mean ratio. This statistic should be close to 1.00. Measures considerably above 1.00 tend to indicate assessment regressivity; measures below 1.00 suggest assessment progressivity. When samples are small or the weighted mean is heavily influenced by several extreme sales prices, the PRD may not be a sufficiently reliable

measure of vertical inequities. A scatter plot of ratios versus appraised values or sale prices is a useful diagnostic tool. A downward (or upward) trend to the data indicates systematic regressivity (or progressivity). Assuming representativeness, high PRDs generally indicate low appraisals on high-priced properties. If not sufficiently representative, extreme sales prices can be excluded in calculation of the PRD. Similarly, when samples are very large, the PRD may be too insensitive to show small pockets in which there is significant vertical inequity. Standards for evaluating the PRD are given in section 9.2.7 in this part. In addition, more powerful statistical tests for vertical inequities are available and should be employed to determine the significance of the indication provided by the PRD (see section 5.7 in this part and Twark, Everly and Downing [1989]).

When these tests show vertical inequities, such inequities should be addressed through reappraisal or other corrective actions. In some cases, additional stratification can help isolate the problem. Measures of level computed for value strata should not be compared as a way of determining vertical inequity because of a boundary effect that is most pronounced in the highest and lowest strata (Schultz 1996).

5.7 Tests of Hypotheses

An appropriate test should be used whenever the purpose of a ratio study is implicitly or explicitly to test a hypothesis. A hypothesis is essentially a tentative answer to a question, such as, Are residential and commercial properties appraised at equal percentages of market value? A test is a statistical means of deciding whether the answer “yes” to such a question can be rejected at a given level of confidence. In this case, if the test leads to the conclusion that residential and commercial properties are not appraised at equal percentages of market value, some sort of corrective action on the part of assessing officials is clearly indicated.

Tests are available to determine whether the

- level of appraisal of a stratum fails to meet an established standard
- meaningful differences exist in the level of appraisal between two or more strata
- high-value properties are appraised at a different percentage of market value than low-value properties

Appropriate tests are listed in table 1-2 and discussed in Gloudemans (1999), *Property Appraisal and Assessment Administration* (IAAO 1990), and *Improving Real Property Assessment* (IAAO 1978, 137–54).

5.8 The Normal Distribution

Many conventional statistical methods assume the sample data conform to the shape of a bell curve, known as the

normal (or Gaussian) distribution. Performance measures based on the mean or standard deviation can be misleading if the study sample does not meet the assumption of normality. As a first step in the analysis, the distribution of sample ratios should be examined to reveal the shape of the data and uncover any unusual features. Although ratio study samples typically do not conform to the normal distribution, graphical techniques and numerical tests can be used to explore the data thoroughly. Traditional choices are the binomial, chi-square, and Lilliefors tests. Newer and more powerful procedures are the Shapiro-Wilk W , the D'Agostino-Pearson K^2 , and the Anderson-Darling A^2 tests (D'Agostino and Stephens 1986).

5.9 Parametric and Distribution-Free (Non-parametric) Statistics

For every problem that might be solved by using statistics, there is usually more than one measure or test. These measures and tests can be divided into two broad categories: parametric and distribution-free (nonparametric). Parametric statistics assume the population data conform to a known family of probability distributions (such as the normal distribution). When the mean, weighted mean, and standard deviation are used in this context, they tend to be more meaningful. Distribution-free statistics make less restrictive assumptions and do not require knowledge about the shape of the underlying population distribution. Given similar distribution of ratios in the underlying populations, distribution free tests, such as the Mann-Whitney test, can determine the likelihood that the level of assessment of property groups differ (Hart 2001). Distribution-free statistics are the median and the COD.

6. Sample Size

6.1 Importance of Sample Size

There is a general relationship between statistical reliability and the number of observations in a sample. The larger the sample size, the greater the reliability.

6.2 Evaluating the Adequacy of a Given Sample Size

The adequacy of a given sample size can be evaluated by computing measures of reliability. If the confidence interval is sufficiently narrow, the sample is large enough. If the confidence interval is too wide, the assessor must either accept less precision or enlarge the sample, if possible.

6.3 Required Sample Size

Formulas are available to compute the minimum sample size necessary to produce selected margins of error at a specified level of confidence. Such formulas depend crucially on the estimated variability of the ratios (Cochran 1977).

6.4 Remedies for Inadequate Samples

Small samples should be enlarged if the assessor desires to increase the reliability of statistical measures. Inadequate sample sizes are typically indicated by unacceptably wide confidence intervals. The following alternatives should be considered:

1. **Restratification.** If levels of appraisal are similar or properties are homogenous, broader strata containing larger samples can be created by combining existing strata or by stratifying on a different basis.
2. **Extending the period from which sales are drawn.** This is often the most practical and effective approach. Sales from prior years can be used; however, adjusting the sale price for time may be necessary and significant property characteristics must not change.
3. **Enlarging the sample by validating previously rejected sales.** Sales previously excluded from the analysis, because it was not administratively expedient to confirm them or to make adjustments, can be reevaluated.

Table 1-2. Tests of Hypotheses

Null Hypothesis	Nonparametric Test	Parametric Test
1. Ratios are normally distributed.	Shapiro-Wilk W test D'Agostino-Pearson K^2 test Anderson-Darling A^2 test Lilliefors Test	N/A
2. The level of appraisal meets legal requirements.	Binomial test	t-test
3. Two property groups are appraised at equal percentages of market value.	Mann-Whitney test	t-test
4. Three or more property groups are appraised at equal percentages of market value.	Kruskal-Wallis test	Analysis of Variance
5. Low- or high-value properties are appraised at equal percentages of market value.	Spearman Rank test	Correlation or regression analysis
6. Sold and unsold parcels are treated equally.	Mann-Whitney test	t-test

4. **Imputing appraisal performance.** Ratio study statistics for strata with no or few sales can sometimes be imputed from the results obtained for other strata. These strata should be as similar as possible. Procedures and techniques used to appraise properties in the strata also should be similar.

6.5 Other Sample Size-Related Representativeness Problems

Sales from areas or substrata in which the number of sales is disproportionately large can distort ratio study results by weighting level and uniformity indicators toward whatever conditions exist in the overrepresented area. To alleviate this problem and create better representativeness, large samples can be further stratified by

- randomly selecting sales to be removed
- isolating the overrepresented groups into substrata
- redefining the time period for the overrepresented groups
- weighting the data

7. Reconciliation of Ratio Study Performance Measures

An important objective of a ratio study conducted by a local jurisdiction is the evaluation of model performance. This is a USPAP requirement in the reconciliation of a mass appraisal. Assessing officials must incorporate a quality control program, including checks and audits of the data, to ensure that sold and unsold parcels are appraised at the same level. This also requires characteristic data for both sold and unsold properties to be current, appropriate, relevant, and collected in a consistent manner.

8. Presentation of Findings, Documentation, and Training

The findings of a ratio study should be sufficiently detailed and documented to meet the needs of the users of the study. Documentation for internal ratio studies can be less detailed than for reports prepared for external uses. The following documentation should be provided in conjunction with any published ratio study.

8.1 Text

A brief text describing the purpose and the methods used should accompany a ratio study. This information can be incorporated in the report of the findings or be contained in a separate memorandum. The text should contain the statistics presented and outline the major procedural steps in completing the study. The text also should describe any rules for eliminating sales or extreme ratios and acknowledge any significant limitations in the data.

8.2 Exhibits

The body of the ratio study report should include for each stratum the statistical results intended to be used for decision-making purposes. All reports should contain the following information:

- date and tax year of the appraisals being evaluated
- number of parcels in each stratum
- number of sales
- number of sales trimmed from the study
- measures of central tendency (appraisal level)
- measures of uniformity (variability) and price-related biases
- confidence interval (measures of reliability) about the measures of central tendency
- summary of adjustments made to sales prices

In addition, there should be a description of the steps taken to ensure that sold and unsold properties were valued and described consistently. If the sold and unsold properties were not treated identically, the documentation should characterize the differences discovered between them.

8.3 Analyses and Conclusions

An objective statement of the results of the ratio study should be prepared. If the study is one in a series, a comparison of the results with those of previous studies can be helpful.

8.4 Documentation

Ratio study procedures should be documented thoroughly. This documentation should take three forms. First, a general guideline should explain the design of the study. This guideline should be updated whenever procedures are changed. Second, all software applications should be documented so that the program logic can be reviewed and modified as needed. Third, a user's manual should explain how to execute the study or run the software.

8.5 Training and Education

The effectiveness of ratio studies can be improved through education and training. Assessment supervisors should conduct seminars or workshops for the appraisal staff to explain how to interpret reports, how ratio studies can be used to improve appraisal performance, and how the results will be used in-house.

9. Ratio Study Standards

Each local jurisdiction should have ratio study performance standards. Local standards should be consistent with state or provincial standards. The standards summarized in table 1-3 are suggested for jurisdictions in which

current market value is the legal basis for assessment. In general, when these standards or other local standards are not met, reappraisal or other corrective measures should be taken.

All standards recommended in this section are predicated on the assumption that steps have been taken to maximize representativeness and validity in the underlying ratio study.

9.1 Level of Appraisal

In analyzing appraisal level, ratio studies attempt to measure statistically how close appraisals are to market value (or to a required statutory constraint that can be expressed as a percentage of market value) on an overall basis. While the theoretically desired level of appraisal is 1.00, an appraisal level between 0.90 and 1.10 is considered acceptable for any class of property. However, each class of property must be within 5 percent of the overall level of appraisal of the jurisdiction (see Section 9.2.1 in this part). Both criteria must be met. By themselves, the calculated measures of central tendency provide only an indication, not proof, of whether the level meets the appropriate goal. Confidence intervals and statistical tests should be used to determine whether it can be reasonably concluded that appraisal level differs from the established goal in a particular instance. Additionally, when uniformity measures show considerable variation between ratios, level measurements may be less meaningful.

9.1.1 Purpose of Level-of-Appraisal Standard

Jurisdictions that follow the IAAO recommendation of annual revaluations (*Standard on Property Tax Policy* [IAAO 2004] and *Standard on Mass Appraisal of Real Property* [IAAO 2002]) and comply with USPAP standard

rules should be able to develop mass appraisal models that maintain an overall ratio level of 100 percent (or very near thereto). However, the local assessor may be compelled to follow reappraisal cycles defined by a legal authority or public policy that can extend beyond one year. During extended cycles the influence of inflation or deflation can shift the overall ratio.

The purpose of a performance standard that allows reasonable variation from 100 percent of market value is to recognize uncontrollable sampling error and the limiting conditions that may constrain the degree of accuracy that is possible and cost-effective within an assessment jurisdiction. Further, the effect of performance standards on local assessors must be considered in light of public policy and resources available.

9.1.2 Confidence Intervals in Conjunction with Performance Standards

The purpose of confidence intervals and similar statistical tests is to determine whether it can be reasonably concluded that the appraisal level differs from the established performance standard in a particular instance. A conclusion of noncompliance requires a high degree of confidence; thus, a 90 percent (two-tailed) or 95 percent (one-tailed) confidence level should be used, except for small or highly variable samples. The demonstration ratio study report in table 1-4 presents 95% two-tailed confidence interval estimates for the mean, median, and weighted mean ratio.

9.2 Appraisal Uniformity

Assuming the existence of an adequate and sufficiently representative sample, if the uniformity of appraisal is unacceptable, model recalibration and/or reappraisal should

Table 1-3. Ratio Study Performance Standards indicating inadequate general quality*

Type of property—General	Type of property—Specific	COD Range**
Single-family residential (including residential condominiums)	Newer or more homogeneous areas	5.0 to 10.0
Single-family residential	Older or more heterogeneous areas	5.0 to 15.0
Other residential	Rural, seasonal, recreational, manufactured housing, 2–4 unit family housing	5.0 to 20.0
Income-producing properties	Larger areas represented by large samples	5.0 to 15.0
Income-producing properties	Smaller areas represented by smaller samples	5.0 to 20.0
Vacant land		5.0 to 25.0
Other real and personal property		Varies with local conditions

These types of property are provided for guidance only and may not represent jurisdictional requirements.

* Appraisal level for each type of property shown should be between 0.90 and 1.10, unless stricter local standards are required.

PRD's for each type of property should be between 0.98 and 1.03 to demonstrate vertical equity.

PRD standards are not absolute and may be less meaningful when samples are small or when wide variation in prices exist. In such cases, statistical tests of vertical equity hypotheses should be substituted (see table 1-2).

** CODs lower than 5.0 could indicate selective reappraisal of sold parcels or non-representative samples.

be undertaken. It is important to recognize that the COD is a point estimate and, especially for small samples, should not be accepted as proof of assessment uniformity problems. Proof can be provided by recognized statistical tests, including bootstrap confidence intervals.

In unusually homogeneous strata, low CODs can be anticipated. In all other cases, CODs less than 5 percent should be considered suspect and possibly indicative of nonrepresentative samples or selective reappraisal of selling parcels.

9.2.1 Uniformity among Strata

Although the goal is to achieve an overall level of appraisal equal to 100 percent of the legal requirement, ensuring uniformity in appraisal levels among strata also is important. The level of appraisal of each stratum (class, neighborhood, age group, market areas, and the like) should be within 5 percent of the overall level of appraisal of the jurisdiction. For example, if the overall level of appraisal of the jurisdiction is 1.00, but the appraisal level for residential property is 0.93 and the appraisal level for commercial property is 1.06, the jurisdiction is not in compliance with this requirement. This test should be applied only to strata subject to compliance testing. It can be concluded that this standard has been met if 95 percent (two-tailed) confidence intervals about the chosen measures of central tendency for each of the strata fall within 5 percent of the overall level of appraisal calculated for the jurisdiction. Using the above example, if the upper confidence limit for the level of residential property is 0.97 and the lower confidence limit for commercial property is 1.01, the two strata are within the acceptable range.

9.2.2 Uniformity among Single-Family Residential Properties

The COD for single-family homes and condominiums in older or more heterogeneous areas should be between 5.0 and 15.0. In areas of newer or fairly similar residences, it should be between 5.0 and 10.0.

9.2.3 Uniformity among Income-Producing Properties

The COD should be between 5.0 and 20.0. In larger, urban market areas, it should be between 5.0 and 15.0.

9.2.4 Uniformity among Unimproved Properties

The COD for vacant land should be between 5.0 and 20.0. The upper limit for an acceptable COD for vacant rural residential or seasonal land may be 25.0.

9.2.5 Uniformity among Rural Residential and Seasonal Properties, Manufactured Housing, and Multifamily Dwellings

The COD for heterogeneous rural residential property, recreational or seasonal homes, manufactured housing, and multifamily dwellings (2-4 units) should be between 5.0 and 20.0.

9.2.6 Uniformity among Other Properties

Target CODs for special-purpose real property and personal property should reflect the nature of the properties involved, market conditions, and the availability of reliable market indicators.

Table 1-4. Demonstration Ratio Study Report

Rank	Parcel #	Appraised value	Sale price*	Ratio	Statistic	Result
1	9	\$87,200	138,720	0.629	Number (n)	17
2	10	38,240	59,700	0.641	Total appraised value	\$1,455,330
3	11	96,320	146,400	0.658	Total sale price	\$1,718,220
4	12	68,610	99,000	0.693	Avg appraised value	\$85,608
5	13	32,960	47,400	0.695	Avg sale price	\$101,072
6	14	50,560	70,500	0.717		
7	15	61,360	78,000	0.787	Mean ratio	0.827
8	16	47,360	60,000	0.789	Median ratio	0.820
9	17	56,580	69,000	0.820	Weighted mean ratio	0.847
10	18	47,040	55,500	0.848		
11	19	136,000	154,500	0.880		
12	20	98,000	109,500	0.895	Price-related differential	0.98
13	21	56,000	60,000	0.933	Coefficient of dispersion	14.5
14	22	159,100	168,000	0.947		
15	23	128,000	124,500	1.028	95% conf. int. mean (two-tailed)	0.754 to 0.901
16	24	132,000	127,500	1.035	95% conf. int. median (two-tailed)	0.695 to 0.933
17	25	160,000	150,000	1.067	95% conf. int. wtd. mean (two-tailed)	0.759 to 0.935

Date: 0/0/00. No outlier trimming

* or adjusted sale price

9.2.7 Vertical Equity

PRDs should be between 0.98 and 1.03. The reason this range is not centered on 1.00 relates to an inherent upward bias in the arithmetic mean (numerator in the PRD) that does not equally affect the weighted mean (denominator in the PRD). When samples are small, have high dispersion, or include properties with extreme values, the PRD may not provide an accurate indication of assessment regressivity or progressivity. Similar considerations apply to special-purpose real property and to personal property. It is good practice to perform an appropriate statistical test for price-related biases before concluding that they exist (see table 1-2).

9.2.8 Alternative Uniformity Standards

The above standards may not be applicable to properties in unique, depressed, or rapidly changing markets. In such cases, assessment administrators may be able to develop target standards based on an analysis of past performance or results in similar markets elsewhere. Such an analysis can be based on ratio study results for the past five years or more.

9.3 Natural Disasters and Ratio Study Standards

Natural disasters such as earthquakes, floods, and hurricanes can have a substantial impact on the interpretation and use of ratio studies. In particular, they

- increase the difficulty of accurately identifying the physical and economic characteristics of property on the dates of sale and appraisal
- increase the difficulty of producing sufficiently reliable appraised values
- decrease the availability of usable sales and other market data
- disrupt the supply and demand equilibrium in the neighborhood community or region

As a result of these potential problems, a number of unreliable sample properties may need to be excluded and sample sizes may be unavoidably reduced. All these factors should be considered when ratio study standards are being applied to study results from areas substantially affected by disasters. Such consideration must not result in unwarranted relaxation of applicable standards. When faced with such situations, assessors must use informed, reasoned judgment and common sense to produce a sufficiently reliable ratio study, based upon the best information available.

10. Personal Property Ratio Studies

Studies can be done by local assessors to determine the quality of assessments of personal property in their jurisdictions. For guidelines on conducting personal property ratio studies, see section 12 in Part 2.

Standard on Ratio Studies

Part 2. Equalization and Performance Monitoring

1. Scope

This part of the standard provides guidance and supplementary information to oversight agencies that perform ratio studies. Oversight or equalization ratio studies are designed to examine the overall degree of accuracy of assessments within or among categories of property, market areas, assessment jurisdictions or political subdivisions, such as school districts, municipalities, counties, states or provinces.

2. Oversight Ratio Studies

Oversight agencies are often required to monitor appraisal performance and take corrective actions when necessary. Equalization is a common tool used by oversight agencies to address problems associated with appraisal level. Reappraisal orders can be used to correct uniformity problems.

2.1 Monitoring of Appraisal Performance

Oversight agencies usually perform sales ratio studies, which can include independent appraisals, to monitor local assessment performance. The findings can serve as the basis for enforcement actions, such as reappraisal or equalization orders. State/provincial agencies also often perform ratio studies to advise assessors and the public about local appraisal conditions. Many state or provincial oversight agencies have a dual role. One role is to advise and assist local appraisal offices, and the other role is to measure local appraisal performance. These two roles can create a conflict of interest, which should be minimized.

2.2 Equalization

Oversight agencies can use the results of ratio studies to equalize, directly or indirectly, appraisals or assessments in taxing jurisdictions. Direct equalization is accomplished by an oversight agency which alters locally determined assessments by ordering appraisals within jurisdictions or property classes to be adjusted to market value or to the legally required level of assessment. Direct equalization can also involve adjusting appraisals of centrally assessed properties. When indirect equalization is used, appraisals are not adjusted. Instead, indirect equalization involves an oversight agency estimating total taxable value, given the legally required level of assessment or market value. Indirect equalization allows proper distribution of intergovernmental transfer payments between state or provincial and local governments despite different levels of appraisal among

jurisdictions or property classes. Equalization is not an appraisal or a substitute for reappraisal.

When equalization is based on ratio study samples, sampling error must be taken into account. When confidence intervals include an acceptable range, equalization cannot be supported statistically. When confidence intervals *fail* to bracket official requirements, equalization actions are supported (see section 6.5, “Measures of Reliability,” and section 11.1, “Level of Appraisal”).

Legal aspects of ratio studies, many of which relate to equalization, are discussed in Appendix F.

2.2.1 Direct Equalization

Many states and provinces have authority and specific procedures for direct equalization. The advantage of direct equalization is that it can be applied to specified strata, such as property classes, geographic areas, and political subdivisions that fail to meet appraisal level performance standards (Dornfest [Journal of Property Tax Assessment and Administration, 2004]). Direct equalization also produces results that are generally more visible to the taxpayer and more clearly reduces perceived inequities between classes (*Standard on Property Tax Policy* [IAAO 2004]). For example, direct equalization allows proper and equal application of debt and tax rate limits and equitable partial exemptions.

Direct equalization involves use of adjustment factors, which produce effects mathematically identical to those derived through the application of “trending” or “index” factors, which are commonly used for value updating by local assessing jurisdictions. The most significant differences typically are the level of the jurisdiction originating the adjustments and the stratification of property to which the factors are applied. Local jurisdictions with primary assessment responsibility can develop value adjustment factors as an interim step between complete reappraisals. Such factors commonly are applied to properties by property type, location, size, age and other characteristics (see *Property Appraisal and Assessment Administration* [IAAO 1990, p. 310]). It is rare for equalization factors developed by oversight agencies to be applied to strata more specific than property class or broad geographic area. Often such factors are applied jurisdiction-wide.

States and provinces that employ direct equalization techniques should understand that such equalization is not a substitute for appraisal or reappraisal. Direct equalization

applied at the stratum level improves equality in effective tax rates between strata and lessens the effect of assessment practices that improperly favor one stratum over another. For example, assuming that all classes of property are to be assessed at 100% of market value, without such equalization, in a case where residential property is assessed at a median of 80% of market value, while commercial property is assessed at a median of 90% of market value, residential property will pay 80% of its proper tax share and commercial property will pay 90% of its proper tax share. Other classes that may be assessed at 100% will pay more than their proper tax shares. **Direct equalization mitigates this problem. However, such equalization cannot improve uniformity between properties within a given stratum.** So, in the previous example, the median level of assessment for residential property can be adjusted from 80% to 100% of market value, assessment disparities between individual residential properties will not be addressed. For this reason, reappraisal orders should be considered as the primary corrective tool for uniformity problems, and direct equalization should be considered appropriate only if time or other constraints preclude such an approach.

2.2.2 Indirect Equalization

The most common use of indirect equalization is to enable proper funding distribution, particularly for school districts. Such equalization provides an estimation of the proper tax base (acknowledging statutory constraints such as agricultural use value) despite appraisals that are higher or lower than legally required levels in certain jurisdictions. For example, if the assessed value of residential property in a jurisdiction is \$750 million, but a residential ratio study shows an assessment level of 75 percent, while the legally required level of assessment is 100 percent, an equalized value of \$1,000 million could be computed ($\$750 \text{ million} / 0.75$). This adjusted or equalized value would then be used to apportion payments or requisitions between the state or province and associated local governments.

Indirect equalization results in fairer funding apportionment because the overall appraisal levels of the taxing jurisdictions tend to vary. If there were no equalization, the extent that a jurisdiction under- or overestimated its total tax base would result in over- or under-apportionment of funds. Indirect equalization does not correct under- or overvaluation between classes of property within a jurisdiction. It adjusts only a portion of the tax or sometimes only intergovernmental payments, is less visible to taxpayers, and often lacks checks and balances associated with direct equalization (see *Standard on Property Tax Policy* [IAAO 2004]). By adjusting governmental payments, tax rates, or partial exemptions, indirect equalization encourages taxing jurisdictions to keep their overall tax bases close to the required level.

Whether used to equalize shared funding or tax rates, the

degree of equalization of the property tax is more limited than with direct equalization. Indirect equalization generally is applied to or affects only a portion of the funding or property tax levy (perhaps the school general levy or city levy). Indirect equalization usually is applied to the jurisdiction, rather than to a stratum, and therefore resolves interjurisdictional discrepancies in assessment level. In addition, properties in strata with poor uniformity are affected disproportionately. For this reason, indirect equalization also is not a substitute for reappraisal.

3. Steps in Ratio Studies

Ratio studies conducted by oversight agencies generally follow the basic steps described for the assessor's office in Part 1, except that it is more important to adopt uniform procedures and be consistent in their application.

3.1 Definition of the Purpose, Scope, and Objectives

The first step in any ratio study is to determine and state clearly the reasons for the study. This crucial step of identifying the purpose of the study determines the specific goals, scope, content, depth, and required flexibility.

3.2 Design of Study

The most important design consideration is that the study sample be sufficiently representative of the population of properties or the distribution of values in the jurisdiction under review. For direct equalization the level of appraisal for property classes or strata subject to such equalization is the primary area of interest and the sample must be designed accordingly. Indirect equalization seeks to estimate the overall dollar value of the population, so the sample must be representative of that overall value and must reflect the disproportionate influences of high value properties. Performance monitoring is concerned with both level and uniformity, but typically involves sample design similar to that required in direct equalization.

3.2.1 Level of Sophistication and Detail

A basic design principle is to keep the study as simple as possible consistent with its purpose. Ratio studies are not all alike and should be tailored to an intended use.

Data analysis has been made easier through computerization. Although every study does not require the same level of statistical detail, each ratio study should include measures of appraisal level, appraisal uniformity, and statistical reliability. Graphs, charts, or other pictorial representations can be useful tools for showing distributions and patterns in the data. There is no model ratio study design that can serve all jurisdictions or all situations equally well. Informed, reasoned judgment and common sense are required in the design of ratio studies.

3.2.2 Sampling

A ratio study is a form of applied statistics, because the analyst draws conclusions about the appraisal of the universe (the entire jurisdiction) of properties based only on those that have sold during a given time period or appraisals selected for a random sample. The ratios constitute the sample that will be used to draw conclusions or inferences about the population.

To determine the accuracy of appraisals within a jurisdiction with absolute certainty, it would be necessary for all properties in the population to have been sold in arm's-length, open-market transfers near the appraisal date or all properties would need to be appraised independently by the oversight agency. Since this is not possible, ratio studies must use samples and draw inferences or conclusions about the population from these samples.

The number of parcels in the population (the jurisdiction or stratum) is not an important determinant of a statistically valid and reliable sample.

3.2.3 Determining the Composition of Samples

In the design stage, the oversight agency must decide whether the ratio study sample should comprise sales (or asking prices when appropriate), independent appraisals, or a combination of the two. Each sample type has its advantages and disadvantages, as described below.

3.2.3.1 Sale Samples

The advantages of using sale samples include the following:

- Properly validated sales provide more objective indicators of market value than independent appraisals.
- Using sales is much less expensive than producing independent appraisals.

The disadvantages include the following:

- Difficulty in collecting sales data in jurisdictions without disclosure documents
- The oversight authority may not have control over the sales data collection and validation process
- Influence of sales chasing can be difficult to detect or prevent
- Samples of sales may not adequately represent the population of properties
- An adequate sample size may not be achieved if sales data are scarce
- Time adjustments are more critical when supplemental sales are included

3.2.3.2 Independent Appraisal Samples

Independent appraisals also can be used instead of or in addition to sales for ratio study samples. (See section 8, "Appraisal Ratio Studies," in this part.)

3.2.3.3 Samples Combining Sales and Independent Appraisals

The oversight agency can design and conduct ratio studies using samples comprised of sales and independent appraisals. In this approach, the combined advantages of sale samples and appraisal samples are realized. However, the disadvantage of combining sales and independent appraisals is the possible existence of some of the disadvantages of sale samples and/or appraisal samples (see Section 8.7).

3.3 Collection and Preparation of Market Data

The reliability of a ratio study depends in part on how accurately the sales or independent appraisals used in the study reflect market values. For sales-based studies, oversight agencies should conduct an independent sales verification and screening program if resources permit. Alternatively, oversight agencies should develop audit criteria to review data submitted to qualify sales, corroborate representativeness and confirm adequate sample size. Audit decisions should accommodate needs of the agency and resources available. Independent appraisals used in ratio studies must comply with the appropriate sections of the *Uniform Standards of Professional Appraisal Practice* (USPAP; Appraisal Foundation 2007), and reflect market values as of the date being studied. Most oversight agencies use property data collected by the local jurisdiction to develop their independent appraisals. In order to produce credible appraisals, the oversight agency must be certain that the local jurisdiction accurately recorded the appropriate value-related property characteristics for each property it is independently appraising. Steps must be taken to ensure that errors in the database made by the local jurisdiction do not materially or significantly affect the conclusions or opinions of value developed by the oversight agency.

3.4 Stratification

Stratification divides all the properties within the scope of the study into two or more groups or strata. Stratification facilitates a more complete and detailed picture of appraisal performance and can enhance sample representativeness

Each type of property subject to a distinct level of assessment could constitute a stratum. Other property groups, such as market areas, school districts and tax units, could constitute additional strata.

Strata should be chosen to be consistent with factors in the mass appraisal model. When the purpose of the study is to evaluate appraisal quality, flexibility in stratification

is essential. The general goal is to identify areas in which the assessment levels are too low or lack uniformity and property groups for which additional reappraisal work may be required. In such cases, it also is highly desirable to stratify on the basis of more than one characteristic simultaneously.

Stratification can help identify differences in level of appraisal between property groups. In large jurisdictions, stratification by market areas is generally more appropriate for residential properties, while stratification of commercial properties by either geographic area or property subtypes (e.g., office, retail, and warehouse/industrial) can be more effective.

3.5 Matching Appraisal Data and Market Data

The physical and legal characteristics of each property used in the ratio study must be the same when appraised for tax purposes and when sold. This implies two essential steps. First, the property description for the sold parcel must match the appraised parcel. If a parcel is split between the appraisal date and the sale date, a sale of any of its parts should not be used in the ratio study.

Second, the property rights transferred, permitted use, and physical characteristics of the property on the date of assessment must be the same as those on the date of sale. Properties with significant differences in these factors should be excluded from the ratio study.

When statutory constraints are imposed on appraisal methods, the resulting assessment may be less than market value. In such cases a sales ratio study may not provide useful performance information. Constraints typically apply to land that qualifies for agricultural-use value, subsidized housing, mineral land, and timberland.

3.5.1 Stratification for Equalization Studies

Oversight agencies generally should define the strata prior to acquiring and compiling data for the ratio study. Predefined stratification is more transparent and enhances cooperation between the oversight agency and the jurisdiction appraising the property subject to equalization. In general, oversight agencies should not redefine the strata once they have been defined for equalization purposes, especially in the case of direct equalization. It is appropriate, however, to collapse strata to compensate for otherwise inadequate samples sizes. In addition a reappraisal or equalization order can be targeted for specific problem areas that cause noncompliance at a broader level of aggregation.

3.5.2 Stratification for Direct Equalization

Strata should be chosen consistent with operational requirements for the required level of equalization. Statistical issues in the determination of strata include the size of the population and resulting strata and the likely variability

of the ratios in each stratum. Care must be taken not to over-stratify, that is, to create strata that are too small to achieve statistical reliability (see section 6, "Sample Size" in part 1 and Sherrill and Whorton [1991]). No conclusion about stratum level or uniformity should be made from stratum samples that are unreliably small (resulting in unacceptably large margins of error). Ultimately, the degree of stratification is determined largely by available sales data, unless it is cost-effective and practical to add sufficient independent appraisals. If sufficient sales or appraisals are not available for a given stratum, it should be combined with similar strata. When strata are combined, provided there is no reason to suspect dissimilar ratios as evidenced by different level or uniformity measures, such combinations permit broader applicability of ratio study results and prevent ratio study analysis from becoming too focused on substrata with few sales or appraisals. When jurisdiction or category wide equalization actions are required, reliability of component strata is not an issue.

3.5.3 Stratification for Indirect Equalization

Indirect equalization develops an estimate of full market value, but assessed values of individual properties are not altered. Such studies can use a substantially different approach to stratification than ratio studies intended for performance evaluation or direct equalization. The purpose of stratification in this case is to minimize distortions due to different assessment levels, which can vary by property type, value range, geographic area, and other factors. When equalization actions are required stratum reliability is not an issue. A reasonable number of strata with small samples and larger margins of error can increase overall representativeness and may reduce the margin of error for the overall jurisdiction-wide sample.

The primary level of stratification should ordinarily be by major property type (e.g., residential, commercial, and vacant land). If circumstances permit, a secondary level of stratification also is recommended. When relying on the weighted mean, the secondary level of stratification (substrata) should normally be value range. Higher-value properties can sell with a different frequency than low-value properties, and appraisal levels can vary between high and low-value properties. As a result, high-value properties can be oversampled (or undersampled) and, because of their high value, can exert a disproportionate influence on the weighted mean and resulting estimated value. Value stratification reduces distortion of the weighted mean caused by over or under-representation of value strata with different levels of appraisal. To properly develop and use value strata, the oversight agency needs each individual assessment in the study universe. If detailed value information is not available, the oversight agency should work with local taxing jurisdictions to obtain sufficient information. At a minimum, a questionnaire can be used to request the total value and number

of parcels in predetermined value categories or quantiles (each range contains the same amount of value).

In situations in which value stratification information is not available, or where property ratios are not significantly value-influenced, substrata can be created based on property subtype, geographic area, or other appropriate criteria. Stratification by these criteria corrects for differences in level of appraisal between substrata. In large jurisdictions, substratification by geographic areas generally is more appropriate for residential properties while sub-stratification by either geographic area or property subtypes (e.g., office, retail, and warehouse/industrial) can be appropriate for income-producing properties.

When relying on the median and when sample sizes permit, it is appropriate to stratify within property class by whichever property characteristic is most likely to capture differences in appraisal levels. This characteristic can be geographic area, property subtype, or value range. Substratification by value range helps capture value-related differences in assessment levels, which (unlike the weighted mean) are not reflected in the median.

3.6 Statistical Analysis

When ratio studies are conducted for equalization purposes, confidence intervals and statistical tests can be used to determine whether it should be concluded at a given confidence level that appraisal performance or level requirements in a stratum (or jurisdiction) being tested meets or falls outside of mandated standards. Statistical tests can be used for comparisons among strata, provided the sample sizes are large enough that meaningful differences are not missed (see section 6, “Ratio Study Statistics and Analyses”).

3.7 Evaluation and Use of Results

Lack of independence between locally determined values and sale prices (sales chasing) or independent appraisals can subvert attempts to improve equity (direct equalization) and result in incorrect distribution of funds between states or provinces and local jurisdictions (indirect equalization). To guard against these possibilities, oversight agencies should ensure that sold and unsold properties are appraised similarly. Also, appraisals used as substitutes for sales must reflect market value, and the oversight agency must take remedial measures in instances in which they do not (see section 9, “Estimating Performance of Unsold Properties”, and Appendix D, “Sales Chasing Detection Techniques”).

4. Timing and Sample Selection

Ratio studies made by oversight and equalization agencies should be conducted at least annually. Where possible, ratio studies conducted by equalization agencies should use final values established at the local level, inclusive of changes made by local appeal boards up to that time.

However, if local appraisers or boards “chase sales” or set values in a manner that is dissimilar to the way other property values have been set, the sample may not be sufficiently representative and should not be used without careful investigation and necessary adjustment.

4.1 Date of Analysis

The date of analysis is a past year when appraisals from past years are being evaluated to avoid the effects of sales chasing. When prior-year assessments are used to gauge current performance (to avoid sales chasing), the results should be adjusted for any reappraisal activity or assessment changes that occurred in the population (net of new construction) between the prior and current years. Sale prices also should be adjusted to the assessment date to account for time trending.

If the purpose of the study is equalization, using sales after the appraisal date (adjusted for time as necessary) helps ensure the independence of appraisals and sales prices. A sales period spanning the appraisal date can be used if measures are taken to ensure the independence of appraisals made after the earlier sales. This approach has the advantage of reducing the importance of time adjustments.

4.2 Representativeness of Samples

The design and conduct of ratio studies requires decisions that maximize representativeness within the constraints of available resources.

In many kinds of statistical studies, samples are selected randomly from the population and from within each stratum to maximize representativeness. Ratio study samples based on independent appraisals can be randomly selected. Because sales are convenience samples and do not represent true random samples, care must be taken to maximize the representativeness of sales samples.

A ratio study sample is considered sufficiently representative for direct equalization and mass appraisal performance evaluation when the distribution of ratios of properties in the sample reflects the distribution of ratios of properties in the population. A ratio study is considered sufficiently representative for indirect equalization when the distribution of ratios of dollars of property value in the samples reflects the distribution of ratios of dollars of property value in the population.

Sales from areas or substrata in which the number of sales is disproportionately large can distort ratio study results by weighting level and uniformity indicators toward whatever conditions exist in the overrepresented area. To alleviate this problem and create better representativeness, large samples can be further stratified by

- randomly selecting sales to be removed
- isolating the overrepresented groups into substrata

- redefining the time period for the overrepresented groups
- weighting the data

4.2.1 Maximizing Representativeness with Independent Appraisals

For independent appraisal-based ratio studies, the application of random sampling techniques can help ensure that appraisal procedures used for the sampled properties are similar to the corresponding population. A well-designed random sampling plan also can help ensure that properties selected for independent appraisals are not concentrated in areas of high sales activity or associated with property types with higher turnover rates in the market.

The USPAP competency rule requires appraisers to have both knowledge and experience required to perform specific appraisals. Independent single-property appraisals must be developed in compliance with Standard 1, must be reported in compliance with Standard 2, and must be reviewed in compliance with Standard 3 of USPAP. Most importantly, care must be taken to ensure that independent appraisals reflect market value as of the appraisal date. Independent mass appraisals must be developed and reported in compliance with Standard 6 of *USPAP*.

4.2.2 Very High-Value Properties

Assessment jurisdictions often contain unique, very-high-value properties (for example, properties that constitute more than 10 percent of the value of a property class) that cannot reasonably be combined with other properties for purposes of the ratio study. For indirect equalization, high-value parcels are especially important to maximize representativeness. For instance, consider a population consisting of 1,000 properties, 999 of which range in value from \$20,000 to \$750,000, and one that is valued at \$1 billion (e.g., a power plant). If the intended use of the ratio study is to estimate the general level and uniformity of appraisal in regard to the typical property, the stratified population of parcels need not include the \$1 billion property. If the intended use of the ratio study is to estimate the total market value in the jurisdiction, however, exclusion of the power plant can distort the study.

Very high-value properties should not be ignored or assumed to be appraised at the legal or general level for indirect equalization studies. An equalization agency should place very high-value property in a separate stratum to prevent distortion of the overall weighted mean or total estimated value. To value the property for ratio study purposes the equalization agency should use a recent properly adjusted sales price if available. If a recent sale is not available the agency should conduct an appraisal of such properties (this is the preferred option) or audit and adjust as necessary the values developed by the local jurisdiction.

5. Acquisition and Analysis of Sales Data

The highest level of independence and objectivity in an equalization or performance monitoring ratio study requires independent sales validation. If resources are not available to achieve this level of sophistication, then a comprehensive audit program should be developed to review the validation and screening work of the local jurisdiction (see Appendix A, “Sales validation Guidelines”).

5.1 Sale Adjustments for Statutorily Imposed Value Constraints

Most states and provinces require appraisal of certain classes of property using statutorily prescribed methods of appraisal that are intended to produce a constrained value that is less than market value. The most common class of property to which such constraints apply is farmland and rangeland that qualifies for agricultural-use valuation. However, constraints may also apply to subsidized housing, mineral land, and other classes. When the purpose of the ratio study is direct or indirect equalization, sales prices must be adjusted as if the selling parcel were subject to the same constraints. If this cannot be done, independent appraisals, which employ the required constraints, should be used to determine the level of appraisal in a manner consistent with the statutory constraints. For example, assume that statutory restrictions require a fixed or artificially high capitalization rate to be used in determining farmland value. If unadjusted farmland sales were to be used, the resulting ratios would be low and could lead to improper equalization decisions. Instead, independent appraisals using the required capitalization rate should be done. These appraisals would lead to ratios that would correctly allow for the statutory constraint.

Use of constrained values produces ratio study results that do not provide information on the true level of appraisal in relation to market value. Use of constrained values is appropriate for equalization. However, when the purpose of the ratio study is to determine the overall quality of assessments or the amount of benefit being awarded by a given statutory constraint on appraised value, the unadjusted sale price or independent market value appraisal must be used. Often, procedural audits can be used as adjuncts to more traditional ratio studies. These audits can be particularly effective when the purpose is to judge overall appraisal quality and when precise, quantitative statistical measures are not obtainable.

5.2 Outlier Ratios

Oversight agencies should consider the extent of sales verification when developing guidelines for trimming limits. In practice, this means that if an oversight agency derives sales data from assessing jurisdictions that may have already removed outliers from the sample, additional trimming may not be necessary (see Appendix B, “Outlier Trimming Guidelines”).

5.2.1 Value Outliers

When the weighted mean is used for indirect equalization, a method that identifies high-value *influential* sales is recommended. Since an influential sale may not have an unusually low or high ratio relative to the rest of the sample, the definition of distortion is based on the principle that the point estimate calculated from the sample should not be statistically significantly different whether the suspect observation is in the sample or not.

To test for an influential sale, one approach is to remove it from the sample and compute the weighted mean and associated confidence interval. If the weighted mean of the sample lies outside the confidence interval calculated without the influential sale, then the sale is truly influential and is a candidate for further scrutiny, isolation in a separate stratum, or possible trimming.

This procedure is intended to test the presence of individual influential sales and is not intended to be used successively after deletion of a sale, but can be applied to more than one apparent outlier at a time by leaving all other sales in the comparison group. Note, however, that the presence of multiple influential sales can indicate the start of a trend. Presence of influential sales is often associated with high price-related differential (PRD) values, which could be the result of systematic regressivity or progressivity.

5.2.2 Outlier Trimming

Statistics calculated from trimmed distributions, obviously, cannot be compared to those from untrimmed distributions or interpreted in the same way. This is especially problematic when making interjurisdictional comparisons. For this reason, oversight agencies may wish to promulgate uniform trimming procedures, based on sound statistical principles. Regardless of the chosen procedure, trimming of outliers must not occur more than once for any sample.

6. Ratio Study Statistics and Analyses

Ratio study measures covered in Part 1 are equally applicable to equalization ratio studies based upon sales or independent appraisals. See section 5.3, "Measures of Appraisal Level," and section 5.4, "Measures of Variability," in Part 1.

6.1 Measures of Appraisal Level

The median is the generally preferred measure of central tendency for direct equalization, monitoring of appraisal performance, or evaluation of the need for a reappraisal.

The mean should not be used for indirect equalization if there are measurable differences in appraisal level of high- and low-value properties (see table 2-2). In data commonly containing outliers, the trimmed mean can be substituted for the mean (Gloude-mans 1999, chapter 3). See Appendix B for outlier-trimming procedures. Be-

cause of its dollar-weighting feature, the weighted mean is most appropriately used in indirect equalization, when estimating the total dollar value of the jurisdiction. When relying on the measure, however, outliers should be carefully reviewed (and deleted if appropriate), since they can strongly affect the weighted mean, particularly when they occur for high-value properties and in small samples.

6.2 Overall Ratio for Combined Strata

For purposes of oversight monitoring of overall appraisal performance and direct equalization, the generally preferred approach is to weight the median ratio of each stratum on the basis of the relative number of properties in the stratum. For indirect equalization, the weight assigned to a measure of central tendency of a stratum should be proportional to the share of that stratum's total estimated market value. Because the number of parcels bears only a loose relationship to dollar value, weighting by number of parcels is not appropriate for indirect equalization.

For indirect equalization, the preferred method of calculating the overall market value of a jurisdiction is as follows:

1. Divide the total appraised (or assessed) value of each stratum by the stratum sample's measure of central tendency (see section 6.3, "Contrasting Measures of Appraisal Level," in this part) to obtain an estimate of the total market value of taxable property in the stratum.
2. Sum the estimates of total stratum market value to obtain an estimate of the total market value of taxable property in the jurisdiction or class of property.
3. To obtain an overall weighted level of assessment (or ratio), divide the total appraised (or assessed) value of the jurisdiction or class of property by the estimated total market value (table 2-1 contains a simplified example).

6.3 Contrasting Measures of Appraisal Level

Table 2-2 summarizes the preferred measures of central tendency for the three broad purposes of indirect equalization, direct equalization, and the general monitoring of appraisal performance.

For indirect equalization, the preferred measure is the weighted mean (the measure used in table 2-1), because it gives equal weight to each dollar. This helps achieve an accurate estimate of total dollar value, the goal of indirect equalization. However, there are implicit difficulties in obtaining sales samples that are representative of all significant groups of properties with different ratios. The weighted mean can be disproportionately influenced by high-value properties, particularly in a small sales sample. A disproportionate influence of high-value properties can

Table 2-1. Illustration of Combining Measures of Central Tendency (Example shown is for indirect equalization)

Data for properties in the study					
Stratum (1)	Total sample assessed value (2)	Total sample sale price (3)	Weighted mean (2)/(3) (4)	Total assessed value of stratum (5)	Indicated market value of stratum (6)
Residential	\$3,000,000	\$4,000,000	0.750	\$600,000,000	\$800,000,000
All other	950,000	1,000,000	0.950	400,000,000	421,000,000
Total				\$1,000,000,000	\$1,221,000,000

Overall ratio = \$1,000,000,000/\$1,221,000,000 = 0.819

Table 2-2. Preferred Estimators

	Indirect Equalization	Direct Equalization	Monitoring Performance
Median	—	X	X
Mean	—	—	—
Weighted Mean	X*	—	—

* Caution should be exercised when the sample contains value outliers or indicates value bias based on the PRD

be reduced through value stratification within the property class. Such value stratification helps capture value-related ratio differences, as well as improve representativeness, regardless of which measure of central tendency is used. If there are provable value-related ratio differences within strata, the weighted mean must be used since the median is incapable of capturing value-related differences. In cases in which value stratification is not practicable, equalization agencies may stratify by some proxy for value, such as neighborhood or property sub-class. If results appear distorted by non-representative high-value sales, outlier identification methods described in Appendix B should be employed.

While not conceptually preferred, the median can be used to prevent the disproportionate influence of high-value properties with outlier ratios. To be clear, although the median is not the conceptually appropriate measure, it nonetheless has the desirable property of smaller sampling variance and, in cases in which assessment regressivity/progressivity has not been found to be a significant concern, can provide an acceptable substitute for the weighted mean.

If samples are known to be reasonably representative through outlier trimming, the use of stratification or selection of random appraisals, the weighted mean would be the (only) correct measure. In cases which sample representativeness is a concern due to small samples or outliers, the median can reasonably be used as long as the equalization agency has checked to ensure that there are no significant price-related biases within the strata used in the study.

6.4 Measures of Variability

Measures of dispersion or variability relate to the uniformity of the ratios and should be calculated for each stratum in the study. In general, the smaller the measure,

the better the uniformity, but extremely low measures can signal one of the following:

acceptable causes

- extremely homogeneous properties
- very stable markets

unacceptable causes

- lack of quality control
- calculation errors
- poor sample representativeness
- sales chasing

Note that as market activity changes or as the complexity of properties increases, the measures of variability usually increase, even though appraisal procedures may be equally valid.

6.5 Measures of Reliability

It is good practice to calculate measures of reliability whenever the results of a ratio study are used for equalization. Measures of reliability will indicate whether there is a desired degree of confidence that a given level of appraisal has not been achieved. The most commonly used measure of ratio study sample reliability is the confidence interval. This interval brackets the unknown population parameter for any sample statistic with a specified (chosen) degree of confidence. When the interval includes a desired assessment level or a performance standard range around the desired level (see section 11 and Table 2-4), equalization adjustments are not warranted. Similarly, when the interval includes a maximum allowable COD (see Table 2-3), reappraisal or other action to correct poor uniformity is not warranted.

6.6 Vertical Inequities

The measures of variability discussed in section 6.4 relate to “horizontal,” or random, dispersion among the ratios in a stratum, regardless of the value of individual parcels. Another form of inequity can be systematic differences in the appraisal of low- and high-value properties, termed “vertical” inequities. When low-value properties are appraised at greater percentages of market value than high-value properties, assessment regressivity is indicated. When low-value properties are appraised at smaller percentages

of market value than high-value properties, assessment *progressivity* is the result. Appraisals made for tax purposes should be neither regressive nor progressive.

An index statistic for measuring vertical equity is the PRD, which is calculated by dividing the mean ratio by the weighted mean ratio. This statistic should be close to 1.00. Measures considerably above 1.00 tend to indicate assessment regressivity; measures below 1.00 suggest assessment progressivity. When samples are small or the weighted mean is heavily influenced by several extreme sales prices, however, the PRD may not be a sufficiently reliable measure of vertical inequities. A scatter plot of ratios versus appraised values or sale prices is a useful diagnostic tool. A downward (or upward) trend to the data indicates systematic regressivity (or progressivity). If not sufficiently representative, extreme sales prices can be excluded in calculation of the PRD. Similarly, when samples are very large, the PRD may be too insensitive to show small pockets in which there is significant vertical inequity. Standards for evaluating the PRD are given in section 9.2.7 in this part. In addition, more powerful statistical tests for vertical inequities are available and should be employed to determine the significance of the indication provided by the PRD (see section 5.7 in this part and Twark, Everly and Downing [1989]).

When these tests show vertical inequities, such inequities should be addressed through reappraisal or other corrective actions. In some cases, additional stratification can help isolate the problem. Measures of level computed for value strata should not be compared as a way of determining vertical inequity because of a boundary effect that is most pronounced in the highest and lowest strata (Schultz 1996).

6.7 Tests of Hypotheses

An appropriate test should be used whenever the purpose of a ratio study is implicitly or explicitly to test a hypothesis. A hypothesis is essentially a tentative answer to a question, such as, Are residential and commercial properties appraised at equal percentages of market value? A test is a statistical means of deciding whether the answer “yes” to such a question can be rejected at a given level of confidence. In this case, if the test leads to the conclusion that residential and commercial properties are not appraised at equal percentages of market value, some sort of corrective action on the part of assessing officials is clearly indicated. Appropriate tests are listed in table 1-2 and discussed in Gloudemans (1999), *Property Appraisal and Assessment Administration* (IAAO 1990), and *Improving Real Property Assessment* (IAAO 1978, 137–54)

6.8 The Normal Distribution

Many conventional statistical methods assume the sample data conform to the shape of a bell curve, known as the

normal (or Gaussian) distribution. Performance measures based on the mean or standard deviation can be misleading if the study sample does not meet the assumption of normality. As a first step in the analysis, the distribution of sample ratios should be examined to reveal the shape of the data and uncover any unusual features. Although ratio study samples typically do not conform to the normal distribution, graphical techniques and numerical tests can be used to explore the data thoroughly. Traditional choices are the binomial, chi-square, and Lilliefors tests. Newer and more powerful procedures are the Shapiro-Wilk W , the D’Agostino-Pearson K^2 , and the Anderson-Darling A^2 tests (D’Agostino and Stephens 1986).

7. Sample Size

7.1 Importance of Sample Size

If it is desirable to create narrow, uniform margins of error in jurisdictions without sufficient sales, independent appraisals may be added.

7.2 Adequacy of a Given Sample Size

The adequacy of a given sample size can be evaluated by computing measures of reliability. If the confidence interval is sufficiently narrow, the sample is large enough. If the confidence interval is too wide, the oversight authority must either accept less precision or enlarge the sample, if possible.

7.3 Required Sample Size

Because designing for sampling objectives and planning for resource allocation in ratio studies must occur well before final ratio data sets are available and ratio study statistics are calculated, decisions on critical input variables must be made well before their true values are known. For example, the sample size formulas (Cochran 1977; Sherrill and Whorton 1991; and Gloudemans 1999) used to plan for specific margins of error and/or specific levels of confidence theoretically require, as input variables, the actual variation within the final ratio data sets (usually measured by the coefficient of variation). However, the actual variation in final ratio data sets is not known during the design and planning stage and, thus, the desired sample size must be projected based upon the best information available at the time of design and planning. This projection results in unavoidable forecast error and can result in the production of a higher or lower sample size than needed to reach sampling objectives. This issue is an accepted part of conducting ratio studies when it is necessary and important to attain a predetermined or uniform degree of precision. In other cases, it may be acceptable to use all available qualified sales. When predetermination of sample size is important, the variation in the ratio data set from the most recent time period available can provide a reasonable estimate for the time period under analysis.

7.4 Remedies for Inadequate Samples

In addition to recommendations discussed in section 6.4, “Remedies for Inadequate Samples,” in Part 1, supplemental independent appraisals can be combined with sales (also see section 8.7, “Combining of Sales and Appraisals,” in this part).

7.5 History of Sales Reporting

Oversight agencies that develop ratio studies from sales provided by local assessment jurisdictions should track the number of transfers obtained in different study periods. Quality control techniques can be used to measure market activity or to determine whether an assessor is fully reporting sales information.

8. Appraisal Ratio Studies

Appraisal ratio studies are conducted by using appraised values for a random sample of parcels. Such sampling plans can be designed to be more representative of the population in terms of property characteristics than a sales sample of the same size but require adequately trained appraisers and are comparatively expensive. Few ratio studies are based solely on independently conducted appraisals, which then are compared to values determined by assessing officials. Many equalization or oversight agencies, however, do ratio studies in which both sales and appraisals are combined. Furthermore, it may be possible to develop sales driven models for use in appraising a particular population of properties (excluding those not adequately represented in the underlying model) or randomly selected parcels for ratio study purposes (see *Standard on Automated Valuation Models*, [IAAO 2003]). Estimates of value developed for use in appraisal ratio studies are considered appraisal services and must comply with *USPAP* Standards 1 and 2 or Standard 6.

8.1 Rationale

Independent appraisals can be used as indicators of market value. Independent appraisals are appraisals performed by appraisers who are not employees of the appraisal agency that is the subject of the study. Such appraisal ratio studies are particularly useful for property classes with limited sale data, such as commercial and industrial real property and personal property (see *Property Appraisal and Assessment Administration* [IAAO 1990, appendix 1-1] and Gloude-mans [1999, chapter 6]). In addition, appraisal ratio studies can be used for agricultural or other properties not appraised on an ad valorem basis. In this case, the appraisals should reflect the use value or other statutory basis on which the properties are appraised.

8.2 Advantages and Disadvantages

Appraisal ratio studies have both advantages and disadvantages. The advantages of appraisal ratio studies are

- the ability to sample from areas or property types with insufficient sales information
- a high degree of control in sample size that enables the analyst to treat jurisdictions equally, regardless of the availability of market information
- the avoidance of nonrepresentativeness stemming from the use of sales samples that may not represent the property population.
- the size of the sample can be specified and
- the initial sample can be randomly drawn, thus helping to maximize representativeness.

If objectivity can be maintained, the appraisal ratio study avoids potential distortions due to systematic differences between appraisals of sampled and unsampled properties. In addition, independent appraisals can be used to test for systematic differences between appraisals of sold and unsold properties.

A disadvantage of appraisal ratio studies is the extra time and cost involved with the independent appraisal process. The subject and any comparables should be physically inspected and the appraisals documented according to appropriate standards. Applicable *USPAP* guidelines should be followed. Independent single-property appraisals should be developed in compliance with *Standard 1*, should be reported in compliance with *Standard 2*, and should be reviewed in compliance with *Standard 3* of *USPAP*. Independent appraisals done with a mass appraisal model should be developed and reported in compliance with *Standard 6* of *USPAP*. Another disadvantage is that appraisals are an opinion of value. Accordingly, they should be documented and tested against the market. However, this becomes difficult when sales data are scarce. To reduce this disadvantage, appraisal ratio study analysts should ensure that appraisals are carefully reviewed and allow local appraisers to submit appraisal information that may affect the value conclusion (see *Standard on Administration of Monitoring and Compliance Responsibilities* [IAAO 2003]). Where adequate sales are available, independent appraisals should be checked for consistency with sales.

8.3 Sample Selection and Resource Requirements

Sample selection and resource planning in appraisal ratio studies require knowledge of statistical sampling, estimation principles, and available resources. Judgment must be used, because the determination of an adequate sample can require more information than is available during the design and planning phase, such as the actual variation within the final ratio data sets (see section 6.2, “Adequacy of a Given Sample Size,” in Part 1). Moreover, the cost of the study increases with the size of the sample. Therefore, the value of more reliable information must be balanced

against the costs of obtaining that information.

In determining the size of the sample for each stratum, the following should be taken into consideration:

1. the required precision (typically measured by the margin of error) of the estimate of the appraisal level, for example, ± 0.05
2. the required confidence level, for example, 95 percent
3. the amount of dispersion expected in the final ratio data set
4. the wastage associated with properties that cannot be efficiently appraised or appraisals that cannot be used for one reason or another (see Gloudemans [1999, chapter 6] for sample size formulas and required input variables; also see Sherrill and Whorton [1991]).

Once the desired size of an appraisal sample has been determined, the individual properties that will constitute the sample should be selected using a statistically valid sampling plan. Stratified random sampling is preferred.

If value stratification is used, sample properties selected from value groups during resource planning can shift into other value groups before completion of the study, thus reducing the ultimate representativeness of the sample. Some appraisal parcels may need to be removed from the sample when anomalous conditions are discovered such as environmental contamination (sufficiently reliable valuations may be prohibitively difficult or resource intensive) or when the independent appraiser is not allowed access to the property. Any sample parcels that are voided or that shift from a stratum because of value changes should be replaced if possible.

Appraisal ratio studies, as with sales ratio studies, require informed, reasoned judgment to maximize sample representativeness and statistical reliability.

8.4 Data Requirements and Appraisal Techniques

The appraisal techniques selected for an appraisal ratio study should be consistent with accepted appraisal principles and practices. The appraisals should reflect the appraisal date in question and should be well documented. Statistical software should be used as much as possible to expand analytical capabilities and perform calculations.

The appraisals used in appraisal ratio studies can be based on CAMA and automated valuation model (AVM) techniques (see Standard on Automated Valuation Models, [IAAO 2003]). The models used must be developed independently from those used for assessment purposes. Adequate market data and property characteristic data are required to develop reliable and defensible model es-

timates. If available, sales from a later period can be used to expand sample size. However, as in sales-based ratio studies, sales derived from primary assessing jurisdictions should be reviewed to ensure accuracy and validity. CAMA and AVM models have the advantage of reducing costs, permitting the use of larger, more representative samples. CAMA and AVM models developed for equalization must focus on the adequacy of overall, not individual, value or level of assessment estimates.

Because the purpose of the appraisal is to make an *independent* value estimate, not audit the assessor's work, the appraisals should be made without knowledge of the assessor's value. Appraisers should *not* be supplied with copies of the assessor's appraisal work sheets or model information. Supervisors should spot-check and review the work of staff appraisers to ensure that the required independence is maintained. When the purpose of the ratio study is equalization or performance measurement, rather than internal quality assurance, the appraisals should not be revealed to the assessor until the assessor's values are final.

8.5 Appraisal Chasing

Appraisal chasing can take two forms, either of which reduces or destroys the validity of the ratio study. The first occurs when an independent appraiser knows the local appraised value and either consciously or unconsciously biases the independent appraised value towards the local appraised value. Independent appraisers should not have access to the local appraiser's values or appraisal work papers prior to completing their appraisals. Also, independent appraisals should be reviewed and tested against the market.

The second form of appraisal chasing occurs when the local appraisal jurisdiction knows which properties are in the ratio study appraisal sample and adjusts local appraised values on some or all of these properties to achieve better ratios without making similar adjustments to unsampled properties. This form of appraisal chasing is similar to sales chasing and has similar consequences (see Appendix D, "Sales Chasing Detection Techniques"). Ratio study analysts should guard against this form of appraisal chasing by withholding the release of sample information until the local appraisal office's values are final. If this form of appraisal chasing occurs, the oversight agency can use local values prior to adjustment to provide a more accurate representation of the population ratios.

8.6 Reviewing of Appraisals

Appraisal supervisors should review appraisal models or individual single-property appraisals to ensure that USPAP and the agency's standards are met. It also is good practice to include some recently sold properties in the sample being appraised as a check on the validity of the methods being applied. In addition, the assessor must be afforded an opportunity to review the appraisals along with supporting

documentation and to submit information supporting different value conclusions. If different value conclusions or factual information would materially affect the outcome of the study, a procedure for resolving conflicts, for example, by an independent review body, should be established.

8.7 Combining of Sales and Appraisals

Appraisals can be combined with valid sales in a ratio study. Using available sales adds objectivity to the study and reduces the required number of appraisals. On the other hand, combining sales and appraisals mixes two market indicators. If sales and appraisals are combined, an analysis should be performed to test the consistency of measures of central tendency derived from the sales ratios compared to the same measures derived from the appraisal ratios. A Mann-Whitney test comparing values per unit or comparing ratios based on sales with those based on appraisals is appropriate for this purpose. Significant differences can result from several of the following conditions:

1. Sales have been chased.
2. Sales and appraisals came from different geographic areas with different markets and different levels of appraisal (maximize representativeness by stratifying).
3. Sales and appraisals have different property characteristics that cause different levels of appraisal.
4. All or some of the sales are invalid.
5. Outlier ratios are causing sale/appraisal ratio differences.
6. All or some of the appraisals are inaccurate.

If none of the first five conditions listed above apply, the appraisals should be tested against the market and revised as necessary (see Wooten, 2003).

Variability measures computed on sales used in the sample should not be expected to be similar to variability measures computed on appraisals. Sales ratios reflect the vagaries of the marketplace. Appraisal ratios, on the other hand, come from comparing the results of one appraisal model (the oversight agency's) to the results of another (the assessing office's). If both parties use mass appraisal procedures, differences in appraisals between the two models should be less than when compared with sales; thus, variability measures based on appraisal ratios can be expected to be lower than those based on sales ratios as long as they represent properties with similar characteristics and similar degrees of appraisal difficulty.

8.8 Average Unit Value Comparisons

In addition to a traditional ratio study, "expert" appraisals can take the form of average unit values and be compared

against the assessor's average unit value for the same parcels. In this technique, parcels are stratified into homogeneous groups, as they would be for appraisal purposes. Appropriate units of comparison are identified for each group, and average unit values are determined through an analysis of available sales, cost, and income data. The assessor's average unit values for the same strata are then calculated and the two averages are compared. Average unit value comparisons is well-rooted in mass appraisal theory and offers an alternative to the time and expense associated with the selection and appraisal of individual parcels.

9. Estimating Performance for Unsold Properties

The objective of a ratio study is to determine appraisal performance for the population of properties. As long as sold and unsold parcels are appraised in the same manner and the data describing them are coded consistently, statistics calculated in a sales ratio study can be used to infer appraisal performance for unsold parcels. However, if parcels that sell are selectively reappraised or recoded, based on their sale prices or some other criterion (such as listing price) and if such parcels are in the ratio study, sales ratio study uniformity inferences will not be accurate (appraisals will appear more uniform than they are). In this situation, measures of appraisal level will also be unsupported unless similar unsold parcels were appraised by a model that produces the same overall percentage of market value (appraisal level) as the parcels that sold.

Oversight agencies must ensure that sold and unsold parcels are appraised at the same level. Several techniques are available for determining whether assessors are selectively appraising sold parcels (see Appendix D, "Sales Chasing Detection Techniques," or *Property Appraisal and Assessment Administration* [IAAO 1990, appendix 20-2] and Gloudemans [1999, chapter 6] for a more detailed discussion).

If unsold properties within a properly specified group are not appraised consistently with sold properties within the same group and according to applicable guidelines, unadjusted sales ratio results cannot be used. The oversight agency will have to adjust calculated results or conduct an alternative study.

Once it is determined that *sales chasing* probably has occurred and probably is reducing the validity of ratio study statistical measures of level or uniformity, it is necessary to redo the ratio study to establish valid measures before any other recommendations, such as reappraisal or equalization action, can be made. If feasible, probably the best approach is to select a sample period that effectively precludes sales chasing. For example, when the lien or appraisal date is January 1, many jurisdictions use sales occurring before that date to make valuation decisions. To test the resulting valuations, it would be appropriate to use

sales occurring after January 1 (or after the last date for changing assessments for the year in question), provided such data are time-adjusted (when necessary) backward to match the appraisal date. As a slight variation on this principle, earlier sales could be used, except when sales chasing is detected, in which case it is appropriate to switch to a later, post-appraisal-date sales period.

Legal or practical constraints can prevent use of optimal sample periods in many cases. In these situations, it is important to determine the exact cause of the sales chasing. For example, if a large proportion of selling properties are appealed and if appeal boards typically adjust to sale price, the result is the same as sales chasing by the assessor. One solution is to use appraised values prior to the action of the appeal board, provided that the appeal adjustment is not merely the result of an atypical clerical or other error. Another approach is to use current sales prices and prior-year values, adjusted for reappraisal activity or assessment value changes in the population. The percentage increase or decrease in the prior-year's appraised values for the population (net of new construction) should be used to adjust the prior-year's values for the sample (Gloude-mans 1999).

10. Presentation of Findings, Documentation, and Training

Oversight agencies should produce ratio studies in a manner that is transparent in all stages to all stakeholders.

(See section 8, Part 1.)

11. Ratio Study Standards

Each state and province should have ratio study performance standards. These standards, summarized in table 2-3, are suggested for jurisdictions in which current market value is the legal basis for assessment. In general, when state and provincial standards are not met, reappraisal or other corrective measures should be taken or equalization procedures can be imposed. When an oversight agency orders such actions, the burden of proof should be on the agency to show that the standards have not been achieved.

All standards recommended in this section are predicated on the assumption that all practicable steps necessary to maximize representativeness and validity in the underlying ratio studies have been conducted.

11.1 Level of Appraisal

The calculated measures of central tendency are point estimates and provide only an indication, not proof, of whether the level meets the appropriate goal. Confidence intervals and statistical tests should be used to determine whether the appraisal level differs from the established goal in a particular instance.

A decision by an oversight agency to take some action (direct equalization, indirect equalization, reappraisal) can have profound consequences for taxpayers, taxing jurisdictions, and other affected parties. This decision should not be made without a high degree of certainty that the action is warranted. Conversely, a decision not to take action when action is needed can have equally profound consequences.

Table 2-3. Ratio study uniformity standards indicating acceptable general quality*

General Property Class	Jurisdiction Size /Profile /Market Activity	Max COD
Residential improved (single family dwellings, condominiums, manuf. housing, 2-4 family units)	Very large jurisdictions / densely populated / newer properties / active markets	10.0
	Large to mid-sized jurisdictions / older & newer properties / less active markets	15.0
	Rural or small jurisdictions / older properties / depressed market areas	20.0
Income-producing properties (commercial, industrial, apartments,)	Very large jurisdictions / densely populated / newer properties / active markets	15.0
	Large to mid-sized jurisdictions / older & newer properties / less active markets	20.0
	Rural or small jurisdictions / older properties / depressed market areas	25.0
Residential vacant land	Very large jurisdictions / rapid development / active markets	15.0
	Large to mid-sized jurisdictions / slower development / less active markets	20.0
	Rural or small jurisdictions/ little development / depressed markets	25.0
Other (non-agricultural) vacant land	Very large jurisdictions / rapid development / active markets	20.0
	Large to mid-sized jurisdictions / slower development / less active markets	25.0
	Rural or small jurisdictions/ little development / depressed markets	30.0

These types of property are provided for general guidance only and may not represent jurisdictional requirements.

**The COD performance recommendations are based upon representative and adequate sample sizes, with outliers trimmed and a 95% level of confidence.*

**Appraisal level recommendation for each type of property shown should be between 0.90 and 1.10.*

**PRD's for each type of property should be between 0.98 and 1.03 to demonstrate vertical equity.*

PRD standards are not absolute and may be less meaningful when samples are small or when wide variation in prices exist. In such cases, statistical tests of vertical equity hypotheses should be substituted.

**CODs lower than 5.0 may indicate sales chasing or non-representative samples.*

Oversight agencies should weigh all the options and consider the issues discussed below when developing or revising a level-of-appraisal standard, and when developing equalization or other appraisal oversight procedures.

11.1.1 Purpose of Level-of-Appraisal Standard

Jurisdictions that follow the IAAO recommendation of annual reassessments and comply with USPAP standards should be able to develop mass appraisal models that maintain an overall ratio level of 100 percent (or very near thereto). The local assessor may be required to observe reappraisal cycles defined by a legal authority or public policy that can extend beyond one year. During extended cycles inflation or deflation can influence the overall ratio.

The purpose of a performance standard that allows reasonable variation from 100 percent of market value is to recognize uncontrollable sampling error and the limiting conditions that may constrain the degree of accuracy that is possible and cost-effective within an assessment jurisdiction. Further, the effect of performance standards on local assessors must be considered in light of expectations of public policy and resources available. For these reasons, states or oversight agencies may adopt performance standards for appraisal level that allow some variance from the 100 percent goal of market value.

11.1.2 Recommended Appraisal Level Standards for Direct and Indirect Equalization

The performance standard adopted by an oversight agency should be a range around the legally required level of appraisal in a property class or an overall jurisdiction. This range should be 90 to 110 percent of the legally required level of appraisal for direct equalization or reappraisal, or 95 to 105 percent for indirect equalization. A smaller maximum range for indirect equalization is justified because taxpayers are not as comprehensively affected. Oversight agencies should adopt performance standards that are as close to the legally required level as can be justified given the local situation and taking into account the factors discussed herein.

In addition to the above appraisal level standards, each class of property for which appraisal level standards have been defined must be within 5 percent of the overall level of appraisal of the jurisdiction (see section 11.2.3, “Uniformity among Strata,” in this part). Both criteria must be met.

11.1.3 Confidence Intervals in Conjunction with Performance Standards

By themselves, the calculated measures of central tendency provide only an indication, not proof, of whether the appraisal level meets the performance standard. So, the purpose of confidence intervals and similar statistical tests is to determine whether the appraisal level differs from the established performance standard in a particular instance. A conclusion of noncompliance requires a high degree of confidence, thus a 90 percent (two-tailed) or 95 percent (one-tailed) confidence interval should be used, except for small or highly variable samples as described in section 11.1.5, “Adjustment for High Variability and Small Samples,” in this part.

11.1.4 Decision Model

The oversight agency should determine whether the estimate is outside the acceptable range around the legal level of appraisal with a specified degree of statistical significance. The chosen interval should overlap the performance standard range of 90 percent to 110 percent in the case of direct equalization or measuring appraisal performance. For indirect equalization the chosen interval should overlap the performance standard range of 95 percent to 105 percent. If the confidence interval does not overlap any portion of the appropriate range, equalization is performed or reappraisal orders are issued. See table 2-4 for an example of the direct equalization or appraisal performance decision making process.

11.1.5 Adjustments for High Variability and Small Samples

High variability, small sample size, or a combination of these factors often causes confidence intervals to become quite wide. Wide confidence intervals reflect the imprecision of the underlying statistic and can decrease the usefulness of performance measures. Also, wide confidence intervals can cause an inequitable situation in which jurisdictions with small samples and large variability are never subject to equalization or reappraisal orders, while jurisdictions with larger samples and much less variability are more likely to be subject to such orders even though their appraisal performance may be arguably better.

For these reasons, oversight agencies should consider expanding sample sizes by taking steps to increase the number of sales or by making independent appraisals (see

Table 2-4. Ratio Study Standards and Decision Making—Direct Equalization or Appraisal Performance Using Median 90%–110% Standard
Example demonstrating application of standard at a 95% level of confidence

Case	Point Estimate	Confidence Interval (CI) Width (95%)	CI Overlaps Performance Standard Range	Point Estimate in Performance Standard Range	Equalization Action or Reappraisal Order
1	92%	86% to 101%	yes	yes	no
2	88%	81% to 95%	yes	no	no
3	84%	79% to 88%	no	no	yes

section 7.4 part 2). If the sample size cannot be increased, two options may be considered when the point estimate fails to achieve compliance but the confidence interval overlaps the range of compliance:

- If a particular point estimate does not meet the standard for the current study cycle the oversight agency may reduce the level of confidence by 5% the following year. This may be followed by an annual stepwise reduction of 5%. Such a reduction may continue to a 70 percent level of confidence if the point estimate fails to meet the compliance threshold over this period of time. Corrective action would be imposed when a given year's confidence interval fails to include the performance standard range.
- The oversight agency may examine statistical point estimates over several study cycles. A jurisdiction that fails to meet a particular point standard for 5 consecutive years has a probability of less than 5% that compliance has been achieved, even if the confidence interval overlaps the compliance threshold every year. In such cases the oversight agency would impose corrective decisions based upon the point estimate.

11.1.6 Calculating Equalization Adjustments

If noncompliance with either direct or indirect equalization standards is indicated, the appropriate point estimate (statistic) measuring appraisal level should be used to calculate adjustment factors, by dividing it into 100 percent.

11.2 Appraisal Uniformity

Assuming the existence of an adequate and sufficiently representative sample, if the uniformity of appraisal is unacceptable, reappraisal should be undertaken regardless of the level of appraisal. The oversight agency should recognize that the COD is a point estimate and cannot be accepted as proof of assessment uniformity problems without an appropriate degree of statistical confidence. Such proof can be provided by recognized statistical tests, including bootstrap confidence intervals. If the data are normally distributed, the COV and confidence intervals around this measure also can be determined. Then the COV can be mathematically converted into an equivalent COD.

11.2.1 Oversight Uniformity Standards

Oversight agencies should establish uniformity standards for local assessment jurisdictions. Any COD performance standards applied to strata within a particular jurisdiction should be related to the overall size, profile of property characteristics (type, age, condition, and obsolescence) and market activity. In general, tighter uniformity standards can be applied to larger jurisdictions with newer construction and active markets. And generally, less stringent unifor-

mity standards should be applied to older, economically depressed or less densely developed areas with less efficient markets. Standards should also be relaxed in jurisdictions that experience economic instability due to sudden changes in supply or demand factors. In developing uniformity standards, oversight agencies should consider reasonable tolerance ranges in making compliance decisions.

11.2.2 Multi-level Uniformity Standards

The uniformity standards presented in table 2-3 are defined in terms of the COD (point estimate) measure and are intended to apply to ratio studies based on sales, not those based on independent appraisals in which lower CODs often are typically observed. If reliability measures are not employed, sample size will play a critical role in setting the maximum acceptable COD. In addition, in unusually homogeneous or restrictive markets or for properties subject to use-value or similar constrained value assessment, low CODs also can be anticipated. In all other cases, CODs less than 5 percent should be considered unusual and possibly indicative of nonrepresentative samples or the selective reappraisal of sold parcels. The COD standards in table 2-3 may not be applicable to property strata in unique, depressed, or rapidly changing markets. In such cases, assessment administrators may be able to develop target standards based on an analysis of past performance or results in similar markets elsewhere. Such an analysis can be based on ratio study results for the past five years or more.

11.2.3 Uniformity among Strata

Although the goal is to achieve an overall level of appraisal equal to 100 percent of the legal requirement, ensuring uniformity in appraisal levels among strata is also important. The level of appraisal of each stratum (class, neighborhood, age group, market areas, and the like) should be within 5 percent of the overall level of appraisal of the jurisdiction. For example, if the overall level of appraisal of the jurisdiction is 1.00, but the appraisal level for residential property is 0.93 and the appraisal level for commercial property is 1.06 the jurisdiction is not in compliance with this requirement. This test should be applied only to strata subject to compliance testing. The oversight agency can conclude that this standard has been met if 95 percent (two-tailed) confidence intervals about the chosen measures of central tendency for each of the stratum fall within 5 percent of the overall level of appraisal calculated for the jurisdiction. Using the above example, if the upper confidence limit for the level of residential property is 0.97 and the lower confidence limit for commercial property is 1.01, the two strata are within the acceptable range.

11.2.4 Vertical Equity

PRDs should be between 0.98 and 1.03. The reason this range is not centered on 1.00 relates to an inherent upward

bias in the arithmetic mean (numerator in the PRD) that does not equally affect the weighted mean (denominator in the PRD). When samples are small, have high dispersion, or include properties with extreme values, the PRD may not provide an accurate indication of assessment regressivity or progressivity. Similar considerations apply to special-purpose real property and to personal property. It is good practice to perform an appropriate statistical test for price-related biases before concluding that they exist (see table 1-2 in Part 1).

11.3 Natural Disasters and Ratio Study Standards

Natural disasters such as earthquakes, floods, and hurricanes can have a substantial impact on the conduct of ratio studies and the interpretation and use of the results, and in general, they:

- increase the difficulty of accurately identifying the physical and economic characteristics of property on the dates of sale/lease and the date of appraisal
- increase the difficulty of producing sufficiently reliable appraised values (numerators)
- decrease the availability of usable sales and other market data
- increase the difficulty of identifying and obtaining such usable data
- increase the difficulty of producing sufficiently reliable independent appraisals
- increase the difficulty of accurately matching the characteristics of numerators with those of denominators

These potential problems can result from extraordinary changes in market conditions and in the physical and economic characteristics of property between the dates of sale/lease and the date of appraisal. As a result of these potential problems, a number of unreliable sample properties may need to be voided and usable sample sizes can be reduced significantly. All of these factors should be considered when ratio study standards are applied to ratio study results from areas substantially affected by natural disasters, but such consideration must not result in unwarranted relaxation of applicable standards. When faced with such situations, oversight agencies must use informed, reasoned judgment and common sense to produce a sufficiently reliable ratio study, based upon the best information available.

12. Personal Property Studies

Most personal property ratio studies performed by oversight agencies are performed for equalization purposes. Because indirect equalization in particular requires overall estimation of value, it is imperative for these ratio studies to focus on large accounts.

Horizontal equity requires similar levels of appraisal between real and personal property. Sales data for personal property are difficult to obtain and analyze because markets for personal property are generally less visible and more difficult to follow than real property markets. Therefore, performance reviews and appraisal ratio studies should be used in place of sales ratio studies to determine the quality of appraisal of personal property. The performance review does not quantify assessment conditions but can determine general assessment quality. The appraisal ratio study can be used to determine the level and uniformity of assessment for personal property.

12.1. The Performance Review

The performance review is an empirical study that evaluates the assessment method used and the ability of the jurisdiction to meet its legal requirement in the assessment of personal property. This type of study can be used to allocate tax dollars in multijurisdictional funding calculations or equalization by assuming that jurisdictions passing the performance review are assessing personal property at the general level of other classes of property analyzed with ratio studies.

12.1.1. Discovery

The jurisdiction must have the ability to discover the owners or users of taxable personal property within the jurisdiction. This is accomplished using phone books, business/occupational licenses, listings, sales tax rolls, and field reviews (see IAAO Course 500, “The Assessment of Personal Property,” and *Standard on Personal Property Valuation* [IAAO 2005] for a complete list).

12.1.2. Valuation

Personal property is valued by using acceptable schedules and methods including depreciation schedules published by nationally recognized valuation firms, market data from published valuation guides, and other generally accepted valuation methods and acceptable adjustments (see *Standard on Valuation of Personal Property*).

12.1.3. Verification

Inclusiveness of personal property returns and reports should be verified by an audit program. The audit program should focus on larger and complex accounts; however, it also should include randomly selected accounts. The audit program should provide coverage of the entire tax base regardless of the jurisdiction’s reappraisal cycle.

12.1.4 Forms and Renditions

Comprehensive forms supplied by the assessment authority should allow the taxpayer to disclose fully all assessable personal property. The tax laws should require mandatory compliance, with meaningful penalties for noncompliance.

12.2. Appraisal Ratio Studies for Personal Property

The appraisal ratio study produces an estimate of the level of assessment of personal property by developing a ratio for property that is on the tax roll through the use of appraisals. The level of assessment determined in this way can be adjusted downward to account for property that has not been assessed.

12.2.1 Assessment Ratio for Personal Property

Personal property market values are usually derived from appraisals using a replacement cost new less depreciation (RCNLD) approach (see IAAO Course 500). A comparison of the depreciation schedules in use to nationally accepted schedules would enable the calculation of a ratio for property on the roll. A statistically sound process should be used to select a sample that is representative of personal property on the tax rolls. Such a sample can be parcel- or value-based depending on the intended use of the ratio study in indirect or direct equalization.

12.2.2 Stratification

Proper stratification of personal property accounts should be done for greater statistical accuracy. Strata should be based on the type and value of personal property accounts.

Stratification by type of account should occur first. Personal property accounts can be divided into residential (motor vehicles, boats, aircraft, and the like), agriculture, and business accounts. Further stratification can occur in residential and agricultural accounts but is necessary in business or commercial accounts. Business accounts are usually stratified by size into a minimum of four groups. Value ranges for these groups should be derived from the value ranges in the local market. One example would be small (less than \$250,000), medium (\$250,000 to \$1 million), moderate (\$1-\$5 million), and large (greater than \$5 million). Individual size of account can be determined by value on the prior-year personal property roll.

12.2.3 Property Escaping Assessment

Personal property is particularly prone to escaping assessment. Some determination should be made about the portion of taxable personal property not on the assessment roll. However, estimates based on national averages are less meaningful at the local jurisdictional level.

12.2.3.1 Identifying Personal Property Owners and Users Not on the Roll

Discovery tools can be used to determine accounts not on the roll for a sample area or group. Once the extent of the problem is identified, a projection can be made of the percentage of personal property not identified on the assessment roll.

12.2.3.2 Identifying Personal Property Not Included in Taxpayer Returns/Reports

The accepted method of determining the property omitted in taxpayer returns/reports is to audit the account (see IAAO workshops on auditing). The audit results are applied back to the account value. The resulting fraction is property that is escaping taxation within that particular personal property account. If appropriate sampling techniques are used in selecting the accounts for audit, the resulting ratio is applied to the total roll to help determine the percentage of personal property escaping assessment within the jurisdiction.

12.2.4 Computing the Level of Appraisal

The overall ratio is then determined by reducing the valuation ratio by the percent of property wholly or partially escaping taxation. For example, if the appraisal level is found to be 90 percent and it is determined that 5 percent of personal property is escaping assessment, then the corrected level of assessment is the appraisal level times the percentage of personal property assessed: $0.90 \times (1 - 0.05) = 0.855$. For indirect equalization, this calculation would result in a higher equalized value.

Standard on Ratio Studies

Definitions

Absolute value. The value of a number (or variable) regardless of its sign. For example, 3 and -3 (minus 3) both have an absolute value of 3. The mathematical symbol for absolute value is one vertical bar on each side of the number in question, for example, $|3|$.

Accuracy. The closeness of a measurement, computation, or estimate to the true, exact, or accepted value. Accuracy also can be expressed as a range about the true value. *See also precision and statistical accuracy.*

Adjusted sale price. The sale price that results from adjustments made to the stated sale price to account for the effects of time, personal property, financing, or the like.

Appraisal. “The act or process of developing an opinion of value; an opinion of value” (USPAP 1999). The act of estimating the money value of property. The money value of property as estimated by an appraiser.

Appraisal date. The date as of which a property’s value is estimated. *See also assessment date.*

Appraisal ratio. (1) The ratio of the appraised value to an indicator of market value. (2) By extension, an estimated fractional relationship between the appraisals and market values of a group of properties. *See also level of appraisal.*

Appraisal ratio study. A ratio study using independent expert appraisals as indicators of market value.

Appraisal-sale price ratio. The ratio of the appraised value to the sale price (or adjusted sale price) of a property; a simple indication of appraisal accuracy.

Appraised value. The estimate of the value of a property before application of any fractional assessment ratio, partial exemption, or other adjustments.

Arithmetic mean. A measure of central tendency. The result of adding all the values of a variable and dividing by the number of values. For example, the arithmetic mean of 3, 5, and 10 is 18 divided by 3 or 6.

Array. An ordered arrangement of data, such as a listing of sales ratios, in order of magnitude.

Assessed value. (1) A value set on real estate and personal property by a government as a basis for levying taxes. (2) The monetary amount at which a property is put on the assessment roll for purposes of computing the tax levy. Assessed values differ from the assessor’s estimate of actual (market) value for four major reasons: fractional assessment ratios, partial exemptions, preferential assessments, and decisions by assessing officials to override market value.

Assessment. (1) In general, the official acts of determining the amount of the tax base. (2) As applied to property taxes, the official act of discovering, listing, and appraising property, whether performed by an assessor, a board of review, or a court. (3) The value placed on property in the course of such act.

Assessment-appraisal ratio. The ratio of the assessed value of a property to an independent appraisal.

Assessment date. The status date for tax purposes. Appraised values reflect the status of the property and any partially completed construction as of this date.

Assessment progressivity (regressivity). An appraisal bias such that high-value properties are appraised higher (or lower) than low-value properties in relation to market values. *See also price-related differential.*

Assessment ratio. (1) The fractional relationship of an assessed value to the market value of the property in question. (2) By extension, the fractional relationship of the total of the assessment roll to the total market value of all taxable property in a jurisdiction. *See also level of assessment.*

Assessment-sale price ratio. The ratio of the assessed value to the sale price (or adjusted sale price) of a property.

Assessor. (1) The head of an assessment jurisdiction. Assessors can be either elected or appointed. In this standard the term is sometimes used collectively to refer to all assessment officials charged with administering the assessment function. (2) The public officer or member of a public body whose duty it is to make the original assessment.

Average deviation. The arithmetic mean of the absolute deviations of a set of numbers from a measure of central tendency such as the median. Taking absolute values is generally understood without being stated. The average deviation of the numbers 4, 6, and 10 about their median (6) is $(2 + 0 + 4) \div 3 = 2$. The average deviation is used in computing the coefficient of dispersion (COD).

Bias. A type of nonsampling error in which a calculated statistic differs systematically from the population parameter. A process is biased if it produces results that vary systematically with some factor that should be irrelevant. In assessment administration, assessment progressivity (regressivity) is one kind of possible bias.

Bootstrap. A computer-intensive method of statistical inference that is based on a repeated resampling of data to provide more information about the population characteristics. The bootstrap is a data-driven procedure that is

particularly useful for confidence interval approximation when no traditional formulas are available or the sample has been drawn from a population that does not conform to the normal distribution.

CAMA. *See* **computer-assisted mass appraisal**

Central tendency. (1) The tendency of most kinds of data to cluster around some typical or central value, such as the mean or median. (2) By extension, any or all such statistics. Some kinds of data, however, such as the weights of cars and trucks, may cluster about two or more values, and in such circumstances the meaning of central tendency becomes unclear. This may happen in ratio studies in which two or more classes of property are combined.

Class. A set of items defined by common characteristics. (1) In property taxation, property classes such as residential, agricultural, and industrial may be defined. (2) In assessment, building classification systems based on type of building design, quality of construction, or structural type are common. (3) In statistics, a predefined category into which data may be put for further analysis. For example, ratios may be grouped into the following classes: less than 0.500, 0.500 to 0.599, 0.600 to 0.699, and so forth.

COD. *See* **coefficient of dispersion.**

Coefficient of concentration. The percentage of observations falling within a specified percentage (say, 15 percent) of a measure of central tendency.

Coefficient of dispersion (COD). The average deviation of a group of numbers from the median expressed as a percentage of the median. In ratio studies, the average percentage deviation from the median ratio.

Coefficient of variation (COV). A standard statistical measure of the relative dispersion of the sample data about the mean of the data; the standard deviation expressed as a percentage of the mean.

Computer-assisted mass appraisal (CAMA). A process that uses a system of integrated components and software tools necessary to support the appraisal of a universe of properties through the use of mathematical models that represent the relationship between property values and supply/demand factors.

Confidence interval. A range of values, calculated from the sample observations, that are believed, with a particular probability, to contain the true population parameter (mean, median, COD). The confidence interval is not a measure of precision for the sample statistic or point estimate, but a measure of the precision of the sampling process (see **reliability**).

Confidence level. The degree of probability associated with a statistical test or confidence interval, commonly 90, 95, or 99 percent. For example, a 95 percent confidence interval implies that were the estimation process repeated

again and again, then 95 percent of the calculated intervals would be expected to contain the true population measure (such as the median, mean, or COD).

Contributory value. The amount a component of a property contributes to the total market value. For improvements, contributory value must be distinguished from costs.

COV. *See* **coefficient of variation.**

Date of sale (date of transfer). The date on which the sale was consummated. This is considered to be the date the deed, or other instrument of transfer, is signed. The date of recording can be used as a proxy if it is not unduly delayed as it would be in a land contract.

Direct equalization. The process of converting ratio study results into adjustment factors (trends) and changing locally determined appraised or assessed values to more nearly reflect market value or the legally required level of assessment. *See also* **equalization** and **indirect equalization.**

Dispersion. The degree to which data are distributed either tightly or loosely around a measure of central tendency. Measures of dispersion include the range, average deviation, standard deviation, coefficient of dispersion, and coefficient of variation.

Distribution-free statistics. A set of robust nonparametric methods whose interpretation or reliability does not depend on stringent assumptions about the distribution of the underlying population from which the sample has been drawn. *See also* **parametric statistics.**

Equalization. The process by which an appropriate governmental body attempts to ensure that property under its jurisdiction is assessed at the same assessment ratio or at the ratio or ratios required by law. Equalization can be undertaken at many different levels. Equalization among use classes (such as agricultural and industrial property) can be undertaken at the local level, among properties in a school district and a transportation district; equalization among counties is usually undertaken by the state to ensure that its aid payments are distributed fairly. *See also* **direct equalization** and **indirect equalization.**

Exploratory data analysis. That part of statistical practice concerned with reviewing the data set to isolate structures, uncover patterns, or reveal features that may improve the confirmatory analysis.

Fixture. An asset that has become part of real estate through attachment in such a manner that its removal would result in a loss in value to either the asset or the real estate to which the asset is affixed.

Fractional assessments. Assessments that by law or by practice have assessment ratios different from 1. Usually the assessment ratio is less than 1, and if assessment biases are present, different classes of property may have different fractional ratios.

Frequency distribution. A table or chart showing the number or percentage of observations falling in the boundaries of a given set of classes. Used in ratio studies to summarize the distribution of the individual ratios. *See also class and histogram.*

Histogram. A bar chart or graph of a frequency distribution in which the frequencies of the various classes are indicated by horizontal or vertical bars whose lengths are proportional to the number or percentage of observations in each class.

Hypothesis. A statement in inferential statistics, the truth of which the analyst is interested in determining.

Independent appraisal. An estimate of value using a model different from that used for assessment purposes. Independent appraisals are used to supplement sales in sales ratio studies or in appraisal ratio studies.

Indirect equalization. The process of computing hypothetical values that represent the oversight agency's best estimate of taxable value, given the legally required level of assessment or market value. Indirect equalization allows proper distribution of intergovernmental transfer payments between state or provincial and local governments despite different levels of appraisal between jurisdictions or property classes. *See also equalization and direct equalization.*

Interquartile range (IQR). The result obtained by subtracting the first quartile from the third quartile. By definition 50 percent of the observations fall within the IQR.

Land contract. An executor's contract for the purchase of real property under the terms of which legal title to the property is retained by the vendor until such time as all conditions stated in the contract have been fulfilled; commonly used for installment purchase of real property.

Level of appraisal. The common, or overall, ratio of appraised values to market values. Three concepts are usually of interest: the level required by law, the true or actual level, and the computed level based on a ratio study.

Level of assessment. The common or overall ratio of assessed values to market values. *See also level of appraisal.* *Note:* The two terms are sometimes distinguished, but there is no convention determining their meanings when they are. Three concepts are commonly of interest: what the assessment ratio is legally required to be, what the assessment ratio for the population actually is, and what the assessment ratio for the population seems to be, on the basis of a sample and application of inferential statistics. When level of assessment is distinguished from assessment ratio, *level of assessment* usually means either the legal requirement or the true ratio, and *assessment ratio* usually means the true ratio or the sample statistic.

Margin of error. A measure of the uncertainty associated with statistical estimates of a parameter. It is typically linked to consumer surveys or political poll questions. A margin of

error is a key component of a confidence interval. It reports a "plus or minus" percentage or proportion quantity in a confidence interval at a specified level of probability (typically 95 percent). *See also confidence interval.*

Market value. The major focus of most real property appraisal assignments. Both economic and legal definitions of market value have been developed and refined. A current economic definition agreed upon by agencies that regulate federal financial institutions in the United States is: The most probable price (in terms of money) which a property should bring in a competitive and open market under all conditions requisite to a fair sale, the buyer and seller each acting prudently and knowledgeably, and assuming the price is not affected by undue stimulus. Implicit in this definition is the consummation of a sale as of a specified date and the passing of title from seller to buyer under conditions whereby: The buyer and seller are typically motivated; Both parties are well informed or well advised, and acting in what they consider their best interests; A reasonable time is allowed for exposure in the open market; Payment is made in terms of cash in United States dollars or in terms of financial arrangements comparable thereto; The price represents the normal consideration for the property sold unaffected by special or creative financing or sales concessions granted by anyone associated with the sale. (See USPAP for additional comments.)

Mass appraisal. The process of valuing a universe of properties as of a given date using standard methodology, employing common data, and allowing for statistical testing (see *USPAP*)

Mean. *See arithmetic mean.*

Median. A measure of central tendency. The value of the middle item in an uneven number of items arranged or arrayed according to size; the arithmetic average of the two central items in an even number of items similarly arranged.

Median absolute deviation. The median of the absolute deviations from the median. In a symmetrical distribution, the measure approximates one-half the IQR.

Median percent deviation. The median of the absolute percent deviations from the median; calculated by dividing the median absolute deviation by one-hundredth of the median.

Nonparametric statistics. *See distribution-free statistics.*

Nonsampling error. The error reflected in ratio study statistics from all sources other than sampling error. While nonsampling error is unavoidable due to the inefficiencies inherent in real property markets, the imperfections of the appraisal process, and the imperfections of conducting ratio studies, all practicable steps must be taken to minimize nonsampling error in ratio studies.

Normal distribution. A theoretical distribution often approximated in real world situations. It is symmetrical and bell-shaped; 68 percent of the observations occur within one standard deviation of the mean and 95 percent within two standard deviations of the mean.

Observation. One recording or occurrence of the value of a variable, for example, one sale ratio among a sample of sales ratios.

Outliers. Observations that have unusual values, that is, differ markedly from a measure of central tendency. Some outliers occur naturally; others are due to data errors.

Parameter. Numerical descriptive measure of the population, for example, the arithmetic mean or standard deviation. Parameters are generally unknown and estimated from statistics calculated from a sample of the population.

Parametric statistics. Statistics whose interpretation or reliability depends on the distribution of the underlying data. *See also* **distribution-free statistics**.

Percentile. The values that divide a set of data into specified percentages when the data are arrayed in ascending order. The tenth percentile includes the lowest 10 percent of the values, the twentieth percentile includes the lowest 20 percent of the values, and so forth.

Personal property. *See* **property**.

Plottage value. The excess of the value of a large parcel of land formed by assemblage over the sum of the values of the unassembled parcels.

Point estimate. A single numerical value that can be used to estimate a population parameter. It is calculated on the basis of information collected from a sample. Point estimates are generally constructed to provide the best unbiased estimate of the population parameter consistent with the sample data. However, the point estimate is only an estimate, and is unlikely to have the same value as the population parameter. (See **Confidence interval** and **Reliability** for discussion of precision of the sampling process.)

Points. Prepaid interest on a loan; one point is equal to 1 percent of the amount of the loan. It is common to deduct points in advance of the loan, so that an individual pays interest on 100 percent of the loan but gets cash on, say, only 99 percent.

Population. All the items of interest, for example, all the properties in a jurisdiction or neighborhood; all the observations in a data set from which a sample may be drawn.

Precision. The level of detail in which a quantity or value is expressed or represented. It can be characterized as the number of digits used to record a measurement. A high level of represented precision may be used to imply a greater level of accuracy; however, this relationship may not be true. Precision also relates to the quality of an operation or degree of refinement by which results are obtained.

A method of measurement is considered precise if repeated measurements yield the same or nearly the same numeric value. *See also* **accuracy and statistical precision**.

PRD. *See* **price-related differential**.

Price. The amount asked, offered, or paid for a property. (See USPAP [2004] for additional comments.)

Price-related differential. The mean divided by the weighted mean. The statistic has a slight bias upward. Price-related differentials above 1.03 tend to indicate assessment regressivity; price-related differentials below 0.98 tend to indicate assessment progressivity.

Progressivity. *See* **assessment progressivity (regressivity)**.

Property. An aggregate of things or rights to things. These rights are protected by law. There are two basic types of property: real and personal. Real property consists of the interests, benefits, and rights inherent in the ownership of land plus anything permanently attached to the land or legally defined as immovable; the bundle of rights with which ownership of real estate is endowed. To the extent that “real estate” commonly includes land and any permanent improvements, the two terms can be understood to have the same meaning. Also called *realty*. Personal property is defined as those items that generally are movable or all items not specifically defined as real property. Many states include as personal property the costs associated with placing personal property in service, such as sales tax, freight, and installation. Installation items include, but are not limited to, wiring, foundations, hookups, and attachments. Two commonly used tests for distinguishing real and personal property are (1) the intent of the parties and (2) whether the item may be removed from the real estate without damage to either.

Qualified sale. A property transfer that satisfies the conditions of a valid sale and meets all other technical criteria for inclusion in a ratio study sample. If a property has undergone significant changes in physical characteristics, use, or condition in the period between the assessment date and sale date, it would not technically qualify for use in ratio study.

Quartiles. The values that divide a set of data into four equal parts when the data are arrayed in ascending order. The first quartile includes the lowest quarter of the data, the second quartile, the second lowest quarter, and so forth.

Random sample. A sample of n items selected from a population in such a way that each sample of the same size is equally likely. This also includes the case in which each element in the sample has an equal chance of being selected.

Range. (1) The maximum value of a sample minus the minimum value. (2) The difference between the maximum and minimum values that a variable may assume.

Ratio study. A study of the relationship between appraised or assessed values and market values. Indicators of market values may be either sales (sales ratio study) or independent “expert” appraisals (appraisal ratio study). Of common interest in ratio studies are the level and uniformity of the appraisals or assessments. *See also level of appraisal and level of assessment.*

Real property. *See property.*

Regressivity. *See assessment progressivity (regressivity).*

Regressivity index. *See price-related differential.*

Reliability. In a sampling process, the extent to which the process yields consistent population estimates. Ratio studies typically are based on samples. Statistics derived from these samples may be more or less likely to reflect the true condition in the population depending on the reliability of the sample. Representativeness, sample size, and sample uniformity all contribute to reliability. Formally, reliability is measured by sampling error or the width of the confidence interval at a specific confidence level relative to the central tendency measure.

Representative sample. A sample of observations from a larger population of observations, such that statistics calculated from the sample can be expected to represent the characteristics of the population being studied.

Sale price. (1) The actual amount of money exchanged for a unit of goods or services, whether or not established in a free and open market. An indicator of market value. (2) Loosely used synonymously with “offering” or “asking price.”

Sale ratio. The ratio of an appraisal (or assessed) value to the sale price or adjusted sale price of a property.

Sales chasing. Sales chasing is the practice of using the sale of a property to trigger a reappraisal of that property at or near the selling price. If sales with such appraisal adjustments are used in a ratio study, the practice causes invalid uniformity results and causes invalid appraisal level results, unless similar unsold parcels are reappraised by a method that produces an appraisal level for unsold properties equal to the appraisal level of sold properties. (2) By extension, any practice that causes the analyzed sample to misrepresent the assessment performance for the entire population as a result of acts by the assessor’s office. A subtle, possibly inadvertent, variety of sales chasing occurs when the recorded property characteristics of sold properties are differentially changed relative to unsold properties. Then the application of a uniform valuation model to all properties results in the recently sold properties being more accurately appraised than the unsold ones.

Sales ratio study. A ratio study that uses sales prices as proxies for market values.

Sample. A set of observations selected from a population. If the sample was randomly selected, basic concepts of probability may be applied.

Sampling error. The error reflected in ratio study statistics that results solely from the fact that a sample of the population is used rather than a census of the population.

Scatter diagram or scatter plot. A graphic means of depicting the relationship or correlation between two variables by plotting one variable on the horizontal axis and one variable on the vertical axis. Often in ratio studies it is informative to determine how ratios are related to other variables. A variable of interest is plotted on the horizontal axis and ratios are plotted on the vertical axis.

Significance. A measure of the probability that an event is attributable to a relationship rather than merely the result of chance.

Skewed. The quality of a frequency distribution that makes it asymmetrical. Distributions with longer tails on the right than on the left are said to be skewed to the right or to be positively skewed. Distributions with longer tails to the left are said to be skewed to the left or to be negatively skewed.

Standard deviation. The statistic calculated from a set of numbers by subtracting the mean from each value and squaring the remainders, adding together all the squares, dividing by the size of the sample less one, and taking the square root of the result. When the data are normally distributed, the percentage of observations can be calculated within any number of standard deviations of the mean from normal probability tables. When the data are not normally distributed, the standard deviation is less meaningful and the analyst should proceed cautiously.

Standard error. A measure of the precision of a measure of central tendency; the smaller the standard error, the more reliable the measure of central tendency. Standard errors are used in calculating a confidence interval about the arithmetic mean and the weighted mean. The standard error of the sample mean is the standard deviation divided by the square root of the sample size.

Statistical accuracy. The closeness between the statistical estimate and the true (but unknown) population parameter value it was designed to measure. It is usually characterized in terms of error or the potential significance of error and can be decomposed into sampling error and nonsampling error components. Accuracy can be specified by the level of confidence selected for a statistical test. *See also accuracy.*

Statistical precision. A reference to how closely the survey results from a sample can reproduce the results that would be obtained from the entire population (a complete census). The amount by which a sample statistic can vary from the true population parameter is due to error. Even

if all the sample data are perfectly accurate, random (sampling) error affects statistical precision (measured by the standard error or standard deviation). The dispersion of ratios in the population and the sample size have a controlling influence over the precision of any statistical estimate. When the reliability of a statistical measure is being evaluated, narrower confidence intervals have greater precision. *See also precision.*

Statistics. Numerical descriptive data calculated from a sample, for example, the median, mean, or COD. Statistics are used to estimate corresponding measures, termed parameters, for the population.

Stratify. To divide, for purposes of analysis, a sample of observations into two or more subsets according to some criterion or set of criteria.

Stratum, strata (pl.). A class or subset that results from stratification.

Time-adjusted sale price. The price at which a property sold adjusted for the effects of price changes reflected in the market between the date of sale and the date of analysis.

Trimmed mean. The arithmetic mean of a data set identified by the proportion of the sample that is trimmed from each end of the ordered array. For example, a 10 percent trimmed mean of a sample of size ten is the average of the eight observations remaining after the largest and smallest observations have been removed.

Value. (1) The relationship between an object desired and a potential owner; the characteristics of scarcity, utility, desirability, and transferability must be present for value to exist. (2) Value may also be described as the present worth of future benefits arising from the ownership of real or personal property. (3) The estimate sought in a valuation. (4) Any number between positive infinity and negative infinity.

Variable. An item of observation that can assume various values, for example, square feet, sales prices, or sales ratios. Variables are commonly described by using measures of central tendency and dispersion.

Weighted mean; weighted average. An average in which each value is adjusted by a factor reflecting its relative importance in the whole before the values are summed and divided by their number.

Weighted mean ratio. Sum of the appraised values divided by the sum of the sales prices (or independent estimates of market value), which weights each ratio in proportion to the sale price (or independent estimate of market value).

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Additional readings on ratio studies can be found at Member Link, IAAO’s bibliographic database, and <http://www.iaao.org>. Many Web sites offer good information on statistics. Because Web site addresses change frequently, they are not listed here.

Appendix A. Sales Validation Guidelines

A.1 Sources of Sales Data

The best sources of sales data are copies of deeds or real estate transfer affidavits containing the full consideration and other particulars of the sale. Assessing officers in jurisdictions without laws mandating full disclosure of sales data to assessing officials work under a severe handicap and should seek legislation that provides for such disclosure.

1. *Real estate transfer documents.* These documents are (1) copies of deeds and land contracts, (2) copies of real estate transfer affidavits, and (3) closing statements.
2. *Buyers and sellers.* Buyers and sellers of real property can be contacted directly to secure or confirm sales data. Means of contact include sales questionnaires, telephone interviews, and personal interviews.
3. *Third-party sources.* Third-party sources include multiple listing agencies, real estate brokers and agencies, government and private fee appraisers, attorneys, appraisal organizations, and others. Of particular value are those individuals or agencies that publish lists of sales or provide sales in an electronic format.

A.2 Information Required

The following data are needed to make any necessary adjustments to sales prices, compute sales ratios, and update ownership information.

1. *Full consideration involved.* This is the total amount paid for the property, including the cash down payment and amounts financed. The sale price is the most essential item of information concerning the sale, and its accuracy must be carefully scrutinized. In many jurisdictions it is common practice in deeds of conveyance to state considerations in such terms as “one dollar plus other due and just consideration.” These amounts are rarely the actual selling price and should be ignored in favor of information from the buyer and seller or other reliable source.
2. *Names of buyer and seller.* This information permits the assessor to maintain a current record of the owners of all property in the jurisdiction. Transfer documents often refer to the buyer as the grantee or transferee and to the seller as the grantor or transferor.
3. *Addresses, phone numbers, and other contact information of buyer and seller or their legal designee.* This information helps to identify more positively the parties to the sale. If the buyer will not reside at the property, the buyer’s address may be needed for future correspondence. If the seller has established a new address, this information will aid the assessor in contacting the seller regarding the sale.
4. *Relationship of buyer and seller.* It is important to know whether the buyer and seller are related individuals or corporate affiliates because such sales often do not reflect market value.
5. *Legal description, address, and parcel identifier.* If each parcel is assigned a unique parcel identifier and if this number is noted on the document at the time it is recorded, then the assessor can locate the parcel in the files directly. If not, the legal description or street address is essential to locate the parcel.
6. *Type of transfer.* It is crucial to identify whether or not a sale is an “arm’s-length” transfer. Therefore, if the sources of sales data do not include copies of deeds, the type of deed should be specifically required.
7. *Time on the market.* Sales that have been exposed to the open market too long, not long enough, or not at all may not represent market value.
8. *Interest transferred.* The appraiser must identify whether or not the entire bundle of rights (fee simple) to the property has transferred. For example, in some transactions, only a life tenancy (“life estate”) may be conveyed, or the seller may retain mineral or other rights to the property. Similarly, the sale price of a property encumbered by a long-term lease may not reflect the market value of the fee simple estate in the property.
9. *Type of financing.* In analyzing the sale, it is helpful to know the amount of down payment; the type, remaining amount, and interest rates of notes secured by mortgages or deeds of trust assumed by the buyer; and the value of any stocks, bonds, notes, or other property passed to the seller. It is also important to know whether the sale conveys title to the property or that it is a land contract, in which title is not conveyed until some time in the future, typically several years.
10. *Personal property.* A sales ratio study requires knowledge of the amount paid for the real

property. The sale document ideally would note the type and value of any significant personal property items included in the transaction.

11. *Date of transfer.* This is the date on which the sale was closed or completed. The date the deed or other transfer document was recorded can be used as a surrogate, provided there was no undue delay in the recording. If there has been a delay in recording, the date of the deed or transfer instrument should be used.
12. *Instrument number.* This number, as well as the record or deed book and page, indicates where the deed is located in the official records and thus can be important in researching sales or leases and identifying duplication.

The data noted above should be maintained in a separate data file or the sale history file component of a CAMA system. In addition, the file should include additional information useful for stratification and other analytical purposes. Sales data files should reflect the physical characteristics of the property when sold. If significant legal, physical, or economic changes have occurred between the sale date and the assessment date, the sale should not be used for ratio studies. (The sale may still be valid for mass appraisal modeling by matching the sale price against the characteristics that existed on the date of sale.)

A.3 Confirmation of Sales

A.3.1 Importance of Confirmation

The usefulness of sales data is directly related to the completeness and accuracy of the data. Sales data should be routinely confirmed or verified by contacting buyers, sellers, or other knowledgeable participants in the transaction. In general, the fewer the sales in a stratum, the less common or more complex the type of property, and the more atypical the sale price, the greater the effort should be to confirm the particulars of the sale. With larger sample sizes, it may be sufficient to confirm single-family residential sales by audit or exception.

A.3.2 Methods of Confirmation

In general, the completeness and accuracy of sales data are best confirmed by requesting the particulars of a sale from parties to the sale. If a transfer document is not required, questionnaires after the sale can be used. A sales questionnaire, which requests the type of information listed in Section A.2, is one practical means of confirming sales. Telephone or personal interviews can be more comprehensive than mailed questionnaires. Forms with space to record the same types of information should be used for such interviews. Appendix G contains a model sale confirmation questionnaire (additional sample sales questionnaires and interview forms can be found in *Improving Real Property Assessment* [IAAO 1978, 95–104]).

Mailed sales questionnaires should be as concise as possible and should include

- a postage-paid return envelope
- official stationery
- purpose of the questionnaire
- contact person
- authorized signature

Forms designed for telephone interviews should include the name and phone number of the contact person. Such forms also should include the date and name of the person conducting the interview along with the number of attempts made to contact a party to the sale.

A.4 Screening Sales

Sales used in a ratio study must be screened to determine whether they reflect the market value of the real property transferred. Specific objectives of sales screening are as follows:

- to ensure that sales prices reflect to the maximum extent possible only the market value of the real property transferred and not the value of personal property, financing, or leases
- to ensure that sales that occurred only during the period of analysis are used
- to ensure that sales are excluded from the ratio study only with good cause (e.g., when they compromise the validity of the study)

Every arm's-length, open-market sale that appears to meet the conditions of a market value transaction should be included in the ratio study unless one of the following occurs:

- Data for the sale are incomplete, unverifiable, or suspect.
- The sale fails to pass one or more specific tests of acceptability.
- A sufficiently representative sample of sales that occurred during the study period can be randomly selected to provide sufficiently reliable statistical measures.

The sales reviewer should take the position that all sales are candidates as valid sales for the ratio study unless sufficient and compelling information can be documented to show otherwise. If sales are excluded without substantiation, the study may appear to be subjective. Reason codes can be established for invalid sales.

No single set of sales screening rules or recommendations can be universally applicable for all uses of sales data or under all conditions. Sales screening guidelines and procedures should be consistent with the provisions of the

value definition applicable to the jurisdiction. Appraisers must use their judgment, but should not be arbitrary. To help analysts make wise and uniform judgments, screening procedures should be in writing. Each sales analyst should be thoroughly familiar with these procedures as well as with underlying real estate principles (Tomberlin 2001).

A.4.1 Sales Generally Invalid for Ratio Studies

The following types of sales are often found to be invalid for ratio studies and can be automatically excluded unless a larger sample size is needed and further research is conducted to determine that sales are open-market transactions.

1. *Sales involving government agencies and public utilities.* Such sales can involve an element of compulsion and often occur at prices higher than would otherwise be expected.
 2. *Sales involving charitable, religious, or educational institutions.* A sale to such an organization can involve an element of philanthropy, and a sale by such an organization can involve a nominal consideration or restrictive covenants.
 3. *Sales involving financial institutions.* A sale in which the lienholder is the buyer can be in lieu of a foreclosure or a judgment and the sale price can equal the loan balance only.
 4. *Sales between relatives or corporate affiliates.* Sales between relatives are usually non-open-market transactions and tend to occur at prices lower than would otherwise be expected.
 5. *Sales settling an estate.* A conveyance by an executor or trustee under powers granted in a will may not represent fair market value, particularly if the sale takes place soon after the will has been filed and admitted to probate in order to satisfy the decedent's debts or the wishes of an heir.
 6. *Forced sales.* Such sales include those resulting from a judicial order. The seller in such cases is usually a sheriff, receiver, or other court officer.
 7. *Sales of doubtful title.* Sales in which title is in doubt tend to be below market value. When a sale is made on other than a warranty deed, there is a question of whether the title is merchantable. Quit claim deeds and trustees' deeds are examples.
1. *Trades.* In a trade, the buyer gives the seller one or more items of real or personal property as all or part of the full consideration. If the sale is a pure trade with the seller receiving no money or securities, the sale should be excluded from analysis. If the sale involves both money and traded property, it may be possible to include the sale in the analysis if the value of the traded property is stipulated, can be estimated with accuracy, or is small in comparison to the total consideration. However, transactions involving trades should be excluded from the analysis whenever possible, particularly when the value of the traded property appears substantial.
 2. *Partial interests.* A sale involving the conveyance of less than the full interest in a property should be excluded from the analysis unless several sales of partial interests in a single property take place at the same time and the sum of the partial interests equals the fee-simple interest. Then the sum of the sales prices of the partial interests can sometimes be assumed to indicate the sale price of the total property. At other times, however, the purchase of such partial interests is analogous to plottage value in which a premium may have been paid.
 3. *Land contracts.* Land contracts and other installment purchase arrangements in which title is not transferred until the contract is fulfilled require careful analysis. Deeds in fulfillment of a land contract often reflect market conditions several years in the past, and such dated information should be excluded from analysis. Sales data from land contracts also can reflect the value of the financing arrangements. In such instances, if the transaction is recent, the sale price should be adjusted for financing (see section A.5.2).
 4. *Incomplete or unbuilt common property.* Sales of condominium units and of units in planned unit developments or vacation resorts often include an interest in common elements (for example, golf courses, clubhouses, or swimming pools) that may not exist or be usable on the date of sale or on the assessment date. Sales of such properties should be examined to determine whether prices might be influenced by promises to add or complete common elements at some later date. Sales whose prices are influenced by such promises should be excluded from the analysis, or the sales prices should be adjusted to reflect only the value of the improvements or amenities in existence on the assessment date.

A.4.2 Sales with Special Conditions

Sales with special conditions can be open-market sales but must be verified thoroughly and used with caution in ratio studies.

5. *Auctions*. In general, auction sales of real property tend to be at the lower end of the price spectrum. Auction sales that have been well-advertised and well-attended may be valid for consideration in ratio studies. The seller also must have the option to set a minimum bid on the property or the right of refusal on all bids (*with reserve*) in order for the sale to be considered valid.

A.4.3 Multiple-Parcel Sales

A multiple-parcel sale is a transaction involving more than one parcel of real property. These transactions present special considerations and should be researched and analyzed before being used in ratio studies.

If the appraiser needs to include multiple-parcel sales, he or she should first determine whether the parcels are contiguous and whether the sale comprises a single economic unit or multiple economic units. Regardless of whether the parcels are contiguous, any multiple-parcel sale that also involves multiple economic units generally should not be used in ratio studies because of the likelihood that these sales include some plottage value or some discount for economies of scale, unless adequate adjustments for these factors can be made to the sale price.

A.4.4 Acquisitions or Divestments by Large Property Owners

Acquisitions or divestments by large corporations, pension funds, or real estate investment trusts (REITs) that involve multiple parcels typically should be rejected for ratio study purposes.

A.4.5 IRS 1031 Exchanges

Internal Revenue Service (IRS) Regulation 1031 stipulates that investment properties can be sold on a tax-deferred basis if certain requirements are met. Sale transactions that represent Section 1031 exchanges should be analyzed like any other commercial transaction and, absent conditions that would make the sale price unrepresentative of market value, should be regarded as valid.

A.4.6 Internet Marketing

Property that sells on the Internet and meets the criteria of being an open-market, arm's-length transaction should be included as a valid transaction in a ratio study. Brokerage and realty firms are using the Internet as an additional method to advertise and market their inventory of property.

A.4.7 Inaccurate Sale Data

Sale information should never be considered absolutely trustworthy. Jurisdictions can reduce the problem by requiring a sale verification questionnaire (see Appendix

- G). There should be statutory penalties for persons who falsify information.

A.5 Adjustments to Sale Prices

Sale prices used in ratio studies may need to be adjusted for financing, assumed long-term leases, personal property, gift programs, and date of sale. This is especially true for nonresidential properties. The real property tax is based on the market value of real property alone as of a specific date. This value may not be the same as investment value (that is, the monetary value of a property to a particular investor) and does not include the value of personal property or financing arrangements.

If adjustments for more than one purpose are to be made, they should be made in the following order:

1. adjustments that develop or isolate the price paid for taxable real property (These include adjustments for personal property received by the buyer, property taken in trade by the seller, the combination of partial interest sales, and incomplete or unbuilt common property.)
2. adjustments that convert the price to a better representation of the market value as of the date of sale (These include adjustments for financing and assumed long-term leases.)
3. adjustments for differences in market value levels between the date of sale and the date of analysis

Procedures for adjusting sales prices should be documented and the adjustment factors supported by market data. These requirements imply an ongoing study of local real estate prices, interest rates, and financing practices. Unsubstantiated or blanket adjustments can jeopardize the acceptance accorded a ratio study by making it appear subjective.

A.5.1 Adjustments for Personal Property

Sales screening includes determining the contributory value of any significant personal property included in the sale. Personal property includes such tangibles as machinery, furniture, and inventories and such intangibles as franchises, licenses, and non-compete agreements. Ordinarily, it is not necessary to consider goodwill, going-concern value, business enterprise value, or the like, unless the value of these intangible assets has been itemized in a sales contract or a formal appraisal has been prepared by either party.

It is necessary to decide whether each item included in the sale should be classified as real or personal property. (See *Standard on Valuation of Personal Property* [IAAO 2005], which provides guidance on classification of property as real or personal.)

Sale prices should be adjusted by subtracting the contributory value of personal property received by the buyer. Ordinary window treatments, outdated models of free-standing appliances, and common-grade used furniture included with residential property do not usually influence the sale price of real property and do not require an adjustment unless the items were specifically broken out in the contract as personal property included in the sale price.

If the value of personal property appears to be substantial (*10 percent for residential, 25 percent for commercial*), the sale should be excluded as a valid sale in statistical analysis unless the sample size is small.

A.5.2 Adjustments for Financing

When financing reflects prevailing market practices and interest rates, sales prices require no adjustment for financing. Adjustments should be considered in the following instances:

1. The seller and lender are the same party and financing is not at prevailing market rates.
2. The buyer assumes an existing mortgage at a non-market interest rate. As with personal property, the preferred means of adjusting for financing is by individual parcel. In this instance and no. 1 above, downward adjustments are warranted when (1) the loan appears to be well secured and the contract interest rate is less than the market interest rate, or (2) the loan appears not to be well secured and the contract interest rate is lower than that required by the market for a loan of equal risk. The amount of adjustment can be computed by capitalizing the difference between monthly payments based on the required market interest rate and those based on the actual interest rate. Market analysis using paired sales (sales of similar properties, some with and some without conventional financing) or statistical techniques can correct for such factors.
3. The seller pays “points” (a percentage of the loan amount). (*Points paid by the borrower are part of the down payment and do not require adjustment.*) When the seller pays points, the sale price should be adjusted downward by the value of the points.
4. The property is sold under a gift program. Gift programs are a type of creative financing for qualified buyers by certain lending institutions that provide the buyer with additional monies to use as part of a down payment or for property improvements. This program is typically associated with low-value properties and can be difficult to discover without a validation questionnaire and/or telephone interview. The

gift amount is added to the actual sale price of the property; however, the seller is never in receipt of the gift amount. This gift amount must be deducted from the actual sale price of the real estate prior to statistical analysis.

Adjustments for financing require data on actual and market interest rates, the amount of the loan, and the term and amortization provisions of the loan. Obtaining and properly analyzing such data, as well as estimating the extent to which the market actually capitalizes non-market financing, are difficult and time-consuming and require specialized skills.

A.5.3 Adjustments for Assumed Leases

The sale price of a property encumbered by a long-term lease of at least three years should be adjusted as follows:

- If the contract rent differs significantly from market rent, then the sales price should be adjusted by the difference between the present worth of the two income streams.
- If the contract rent exceeds market rent, the present worth of the difference in the two income streams should be subtracted from the sale price.
- If the contract rent is less than current market rent, the present worth of the difference in the two income streams should be added to the sale price.

A.5.4 Adjustments for Time

There should be a program to track changes in price levels over time and adjust sale prices for time as required. This step is an important component of a ratio study. Time adjustments must be based on market analysis and supported with appropriate documentation.

Valid time-adjustment techniques are as follows:

- tracking sales and appraisal ratios over time
- including date-of-sale as a variable in regression or feedback models
- analyzing re-sales
- comparing per-unit values over time in homogeneous strata, such as a subdivision or condominium complex
- isolating the effect of time through paired sales analysis
- statistically supported time trend analysis studies

These techniques are discussed in Gloudemans (1990; 1999), *Property Appraisal and Assessment Administration* (IAAO 1990, Appendix 5-3), and *Improving Real Property Assessment* (IAAO 1978, section 4.6). If sales prices have generally been rising, ratios for sales that

occurred after the assessment date tend to understate the overall level of appraisal. Similarly, sales ratios for sales that occurred before the assessment date tend to overstate the level of appraisal. If prices are generally declining, an opposite pattern results. When tracking ratios over time (using the inverse ratio technique) for determining time adjustments, it is important that ratios for chased sales be excluded, since there is no correlation of such sales ratios with the date of sale.

Changes in price levels should be monitored and time adjustments made by geographic area and type of property, because different segments of the market tend to change in value at different rates.

Oversight agencies can make any appropriate time adjustments after making all other adjustments.

A.5.5 Other Adjustments

Adjustments to sales prices should not be made for real estate sales and brokerage commissions; closing costs, such as attorney's fees, transfer taxes, and title insurance; and current or delinquent property taxes. Exceptions to this general rule occur when the buyer agrees to pay real estate commissions and delinquent property taxes, in which case the amounts of the payments should be added to the sale

price if not already included in the sale amount. Other exceptions occur when the seller agrees to pay expenses normally paid by the buyer. Such expenses include loan origination fees and repair allowances. Loan origination fees paid by the seller should be deducted from the sale price. Repair allowances should be deducted from the sales price only if the property was in an unrepaired state on the appraisal date, but sold at a higher price reflecting the value of the repairs. If the sale occurred before the appraisal date and the repairs were made prior to that date, no adjustment should be made (Knight, Miceli, and Sirmans 2000).

A.5.6 Special Assessments

Special assessments are used to finance capital improvements or provide services adjacent to the properties they directly benefit. Typically, the property owner is obligated to make annual payments of principal and interest to a local unit of government over a specified number of years. The sale price of a property encumbered by a special assessment can require adjustment if the current balance of the defrayed amount is significant. The sale price can be adjusted upward to account for this lien. If the effect on market value is significant and can be ascertained, an adjustment should be made.

Appendix B. Outlier Trimming Guidelines

B.1 Identification of Ratio Outliers

It is first necessary to determine a procedure to identify outliers. Outlier identification based on the interquartile range (IQR) uses order statistics (see table B-1) and has been shown to be robust for a wide variety of distributions (Iglewicz and Hoaglin 1993; Barnett and Lewis 1994). The term outlier is often associated with ratios that fall outside 1.5 multiplied by the IQR. A factor of 3.0 X IQR often is chosen to identify extreme outliers. Other outlier identification procedures are found in statistical literature and can be used. Outlier identification and trimming must not be a part of the sales validation process.

The example in table B-1 demonstrates the use of the 1.5 X IQR procedure to identify outlier ratios. The distribution of ratios often is skewed to the right; therefore, it may be preferable to apply appropriate transformations to the ratios prior to applying the IQR method. For example, the use of logarithmic transformations tends to identify fewer high and more low ratios as outliers.

B.2 Scrutiny of Identified Outliers

The preferred method of handling an outlier ratio is to subject it to additional scrutiny to determine whether the sale is a non-market transaction or contains an error in fact. If an error can be corrected (for example, data entry), the property should be left in the sample. If the error cannot be corrected or inclusion of the identified outlier would reduce sample representativeness, the sale should be excluded.

B.3 Outlier Trimming

Once outliers have been identified and scrutinized and any errors resolved, the next step is to exclude those that may unduly influence calculated statistical measures. For this reason, it is acceptable to trim outliers identified by recognized procedures (for cautionary notes on trimming small samples, see Tomberlin [2001] and Hoaglin, Mosteller, and Tukey [1983]). An example of such trimming is found in Table B-2. However, trimming of outliers using arbitrary limits, for example, eliminating all ratios less than 50 percent or greater than 150 percent, tends to distort results and should not be employed.

Detected outliers should be reported and can be treated in a variety of ways, including trimming (D'Agostino and Stephens 1986). If outliers are to be considered for removal, the analyst can select a procedure to trim all or just the extreme or influential outliers (see table B-2). If a trimming method has been used to reject ratios from the sample, this fact must be stated in the resulting statistical analysis. Outlier trimming is not mandatory; however, if

Table B-1. A Distribution-Free Method for Locating Outliers (*The following procedure identifies outlier ratios that fall more than 1.5 times beyond the range of the middle 50 percent of the arrayed sample.*)

Locating trim boundaries

Data set before trimming

Rank	Ratio (A/S)
1	0.611
2	0.756
3	0.762
4	0.853
5	0.867
6	0.909
7	0.925
8	0.944
9	1.014
10	1.052
11	1.178
12	1.367
13	1.850
14	2.500
Median ratio	0.935
COD	32.271

Steps to locate trim boundaries

1. *Locate the first quartile point*

Formula to locate the first quartile:

$$(0.25 \times \text{number of ratios}) + 0.25$$

$$(0.25 \times 14 \text{ ratios}) + 0.25 = 3.75$$

3.75 is three-quarters between the third and fourth ranked ratios.

$$\text{Ratio 3} = 0.762$$

$$\text{Ratio 4} = 0.853$$

$$\text{Three-quarters between} = (0.853 - 0.762) \times 0.75 = 0.068$$

$$\text{The first quartile point} = 0.762 + 0.068 = 0.830$$

2. *Locate the third quartile point*

Formula to locate the third quartile

$$(0.75 \times \text{number of ratios}) + 0.75$$

$$(0.75 \times 14 \text{ ratios}) + 0.75 = 11.25$$

11.25 is one-quarter between the eleventh and twelfth ranked ratios.

$$\text{Ratio 11} = 1.178$$

$$\text{Ratio 12} = 1.367$$

$$\text{One-quarter between} = (1.367 - 1.178) \times 0.25 = 0.047$$

$$\text{The third quartile point} = 1.178 + 0.047 = 1.225$$

3. *Compute the interquartile range*

The distance between the first and third quartile = interquartile range

$$1.225 - 0.830 = 0.395$$

4. *Establish the lower boundary*

$$\text{Lower trim point} = \text{first quartile} - (\text{interquartile range} \times 1.5 \text{ or } 3.0)$$

$$0.830 - (0.395 \times 1.5) = 0.238,$$

5. *Establish the upper boundary*

$$\text{Upper trim point} = (\text{interquartile range} \times 1.5 \text{ or } 3.0) + \text{third quartile}$$

$$(0.395 \times 1.5) + 1.225 = 1.818$$

Outliers identified:

1.850

2.500

Table B-2. Effects of Outlier Trimming
Outliers identified in Table B-1 trimmed

<i>After 1.5x trimming</i>	
Rank	Ratio (A/S)
1	0.611
2	0.756
3	0.762
4	0.853
5	0.867
6	0.909
7	0.925
8	0.944
9	1.014
10	1.052
11	1.178
12	1.367
Median ratio	0.917
COD15.649	

outlier-trimming procedures are not used, sales with extreme or influential ratios must be thoroughly validated and determined to be highly trustworthy observations because they can play a pivotal role in the ratio study outcome.

B.4 Trimming Limitations

For some distributions, such as when the sample exhibits a high clustering around a specific ratio, the IQR outlier identification method is not appropriate. In such cases the IQR could be quite narrow, leading to the calculation of lower and upper boundaries for outliers and extremes that are quite close to the middle of the data. In such cases, ratios beyond those boundaries should not be automatically excluded, but instead reasonable judgment should be applied to exclude only true outliers or extremes. As one safeguard, analysts can refrain from automatically deleting any “outliers” or “extremes” inside the bound-

aries where 95 percent (two standard deviations) of the observations would be expected to lie, assuming a normal distribution of data.

It is also appropriate to set maximum trimming limits. For small samples, no more than 10 percent (20 percent in the most extreme cases) of the ratios should be removed. For larger samples, this threshold can be lowered to 5 to 10 percent depending on the distribution of the ratios and the degree to which sales have been screened or validated. Trim limits should be developed in consideration of the extent of sales verification.

In general, IQR-based outlier identification should be undertaken in instances in which sample sizes are sufficient to preclude the aberrant results that can be expected when this procedure is applied to small, highly variable samples.

B.5 Analytical Use of Identified Outliers

After identification, scrutiny, and correction of errors associated with outliers, the procedure can be run again to identify any remaining apparent outliers. If outlier ratios tend to be concentrated in certain areas or other subsets of the sample, they can point directly to systematic errors in the appraisal process and should be stratified and reanalyzed if they are sufficiently representative.

B.6 Reporting Trimmed Outliers and Results

Ratio study reports or accompanying documentation should clearly state the basis for excluding outlier ratios. Statistics calculated from trimmed distributions, obviously, cannot be compared to those from untrimmed distributions or interpreted in the same way.

Appendix C.

Median Confidence Interval Tables for Small Samples

For small samples, tables C-1 and C-2 demonstrate use of a formula based upon the binomial distribution (Clapp 1989) to develop the lower and upper median confidence interval estimates. R_i is the ratio in an array ranked from the lowest ($i = 1$) to the highest (sorted in ascending order). Each confidence interval boundary typically falls between two ratios in the array. The interpolation factor is multiplied by the ratio value and the two are added together to obtain a weighted average. This method should be used for small samples with up to 30 observations (see tables C-1 and C-2). For larger samples the method found in *Property Appraisal and Assessment Administration* (IAAO 1990, p 609) may be used.

Example

Using data from table 1-4 ($n = 17$ ratios) and a 95 percent confidence interval in table C-2:

Lower bound:

$$[0.695 (\text{Ratio}_5) \times 0.9899] + [0.717 (\text{Ratio}_6) \times 0.0101] = \mathbf{0.695}$$

Upper bound:

$$[0.933 (\text{Ratio}_{13}) \times 0.9899] + [0.895 (\text{Ratio}_{12}) \times 0.0101] = \mathbf{0.933}$$

Therefore, the 95% median ratio confidence interval in table 1-4 is from .695 to .933.

Table C-1. 90% Confidence Interval Table

n	Lower Bound	Upper Bound
5	.8800 x R ¹ + .1200 x R ²	.8800 x R ⁵ + .1200 x R ⁴
6	.6333 x R ¹ + .3667 x R ²	.6333 x R ⁶ + .3667 x R ⁵
7	.2286 x R ¹ + .7714 x R ²	.2286 x R ⁷ + .7714 x R ⁶
8	.8643 x R ² + .1357 x R ³	.8643 x R ⁷ + .1357 x R ⁶
9	.5667 x R ² + .4333 x R ³	.5667 x R ⁸ + .4333 x R ⁷
10	.1067 x R ² + .8933 x R ³	.1067 x R ⁹ + .8933 x R ⁸
11	.7855 x R ³ + .2145 x R ⁴	.7855 x R ⁹ + .2145 x R ⁸
12	.4282 x R ³ + .5718 x R ⁴	.4282 x R ¹⁰ + .5718 x R ⁹
13	.9558 x R ⁴ + .0442 x R ⁵	.9558 x R ¹⁰ + .0442 x R ⁹
14	.6511 x R ⁴ + .3489 x R ⁵	.6511 x R ¹¹ + .3489 x R ¹⁰
15	.2217 x R ⁴ + .7783 x R ⁵	.2217 x R ¹² + .7783 x R ¹¹
16	.8261 x R ⁵ + .1739 x R ⁶	.8261 x R ¹² + .1739 x R ¹¹
17	.4603 x R ⁵ + .5397 x R ⁶	.4603 x R ¹³ + .5397 x R ¹²
18	.9735 x R ⁶ + .0265 x R ⁷	.9735 x R ¹³ + .0265 x R ¹²
19	.6480 x R ⁶ + .3520 x R ⁷	.6480 x R ¹⁴ + .3520 x R ¹³
20	.2072 x R ⁶ + .7928 x R ⁷	.2072 x R ¹⁵ + .7928 x R ¹⁴
21	.8084 x R ⁷ + .1952 x R ⁸	.8084 x R ¹⁵ + .1952 x R ¹⁴
22	.4156 x R ⁷ + .5844 x R ⁸	.4156 x R ¹⁶ + .5844 x R ¹⁵
23	.9413 x R ⁸ + .0587 x R ⁹	.9413 x R ¹⁶ + .0587 x R ¹⁵
24	.5884 x R ⁸ + .4116 x R ⁹	.5884 x R ¹⁷ + .4116 x R ¹⁶
25	.1203 x R ⁸ + .8797 x R ⁹	.1203 x R ¹⁸ + .8797 x R ¹⁷
26	.7371 x R ⁹ + .2629 x R ¹⁰	.7371 x R ¹⁸ + .2629 x R ¹⁷
27	.3161 x R ⁹ + .6839 x R ¹⁰	.3161 x R ¹⁹ + .6839 x R ¹⁸
28	.8687 x R ¹⁰ + .1313 x R ¹¹	.8687 x R ¹⁹ + .1313 x R ¹⁸
29	.4831 x R ¹⁰ + .5169 x R ¹¹	.4831 x R ²⁰ + .5169 x R ¹⁹
30	.9876 x R ¹¹ + .0124 x R ¹²	.9876 x R ²⁰ + .0124 x R ¹⁹

From **Table 1-4.** Demonstration Ratio Study Report

Rank	Parcel #	Appraised value	Sale price*	Ratio
1	9	\$87,200	138,720	0.629
2	10	38,240	59,700	0.641
3	11	96,320	146,400	0.658
4	12	68,610	99,000	0.693
5	13	32,960	47,400	0.695
6	14	50,560	70,500	0.717
7	15	61,360	78,000	0.787
8	16	47,360	60,000	0.789
9	17	56,580	69,000	0.820
10	18	47,040	55,500	0.848
11	19	136,000	154,500	0.880
12	20	98,000	109,500	0.895
13	21	56,000	60,000	0.933
14	22	159,100	168,000	0.947
15	23	128,000	124,500	1.028
16	24	132,000	127,500	1.035
17	25	160,000	150,000	1.067

Date: 0/0/00. No outlier trimming

* or adjusted sale price

Table C-2. 95% Confidence Interval Table

n	Lower Bound	Upper Bound
6	.9000 x R ¹ + .1000 x R ²	.9000 x R ⁶ + .1000 x R ⁵
7	.6857 x R ¹ + .3143 x R ²	.6857 x R ⁷ + .3143 x R ⁶
8	.3250 x R ¹ + .6750 x R ²	.3250 x R ⁸ + .6750 x R ⁷
9	.9222 x R ² + .0778 x R ³	.9222 x R ⁸ + .0778 x R ⁷
10	.6756 x R ² + .3244 x R ³	.6756 x R ⁹ + .3244 x R ⁸
11	.2873 x R ² + .7127 x R ³	.2873 x R ¹⁰ + .7127 x R ⁹
12	.8936 x R ³ + .1064 x R ⁴	.8936 x R ¹⁰ + .1064 x R ⁹
13	.6056 x R ³ + .3944 x R ⁴	.6056 x R ¹¹ + .3944 x R ¹⁰
14	.1659 x R ³ + .8341 x R ⁴	.1659 x R ¹² + .8341 x R ¹¹
15	.8218 x R ⁴ + .1782 x R ⁵	.8218 x R ¹² + .1782 x R ¹¹
16	.4827 x R ⁴ + .5173 x R ⁵	.4827 x R ¹³ + .5173 x R ¹²
17	.9899 x R ⁵ + .0101 x R ⁶	.9899 x R ¹³ + .0101 x R ¹²
18	.7076 x R ⁵ + .2924 x R ⁶	.7076 x R ¹⁴ + .2924 x R ¹³
19	.3059 x R ⁵ + .6941 x R ⁶	.3059 x R ¹⁵ + .6941 x R ¹⁴
20	.8835 x R ⁶ + .1165 x R ⁷	.8835 x R ¹⁵ + .1165 x R ¹⁴
21	.5479 x R ⁶ + .4521 x R ⁷	.5479 x R ¹⁶ + .4521 x R ¹⁵
22	.0697 x R ⁶ + .9303 x R ⁷	.0697 x R ¹⁷ + .9303 x R ¹⁶
23	.7381 x R ⁷ + .2619 x R ⁸	.7381 x R ¹⁷ + .2619 x R ¹⁶
24	.3373 x R ⁷ + .6627 x R ⁸	.3373 x R ¹⁸ + .6627 x R ¹⁷
25	.8958 x R ⁸ + .1042 x R ⁹	.8958 x R ¹⁸ + .1042 x R ¹⁷
26	.5481 x R ⁸ + .4519 x R ⁹	.5481 x R ¹⁹ + .4519 x R ¹⁸
27	.0677 x R ⁸ + .9323 x R ⁹	.0677 x R ²⁰ + .9323 x R ¹⁹
28	.7221 x R ⁹ + .2779 x R ¹⁰	.7221 x R ²⁰ + .2779 x R ¹⁹
29	.3063 x R ⁹ + .6937 x R ¹⁰	.3063 x R ²¹ + .6937 x R ²⁰
30	.8709 x R ¹⁰ + .1291 x R ¹¹	.8709 x R ²¹ + .1291 x R ²⁰

Appendix D. Sales Chasing Detection Techniques

As long as sold and unsold parcels are appraised in the same manner and the data describing them are coded consistently, statistics calculated in a sales ratio study can be used to infer appraisal performance for unsold parcels. However, if parcels that sell are selectively reappraised or recoded based on their sale prices or some other criterion (such as listing price) and if such parcels are in the ratio study, sales ratio study uniformity inferences will not be accurate (appraisals will appear more uniform than they are). In this situation, measures of appraisal level also will be unsupported unless similar unsold parcels were appraised by a model that produces the same overall percentage of market value (appraisal level) as on the parcels that sold based on consistently coded descriptive and locational data.

Assessors and oversight agencies do not need to employ all the detection techniques described in this appendix, but should consider implementing at least one procedure. In some cases, access to assessment information for all properties is necessary to perform the suggested techniques. Agencies that do not have access to these data are at a disadvantage, but should still implement detection techniques, such as those described in sections D.3 and D.4, which do not require such comprehensive assessment information.

D.1 Comparison of Average Value Changes

If sold and unsold properties within a specified group are appraised in the same way, their appraised values should reflect similar average percentage changes from year to year. Accordingly, changes in appraised values for sold and unsold parcels can be compared to determine whether sold parcels have been selectively appraised. Alternatively, the average percent change in value for sample parcels can be compared to that for the population of properties within a specified group or stratum for an indication of selective reappraisal.

For example, if sold parcels are considered representative of a stratum and appraised values increased an average of 10 percent while appraised values for unsold parcels in the same stratum increased an average of only 2 percent, “sales chasing” is a likely conclusion. At a more sophisticated level, the distribution of value changes for sold and unsold parcels can be compared, or statistical tests can be used to determine whether the distributions are different at a given level of confidence.

Statistical significance in the absence of practical significance may be moot. In large samples, small differences in the magnitude of assessed value changes on sold and unsold parcels can be proven to be statistically significant,

yet the actual differences may be slight. Therefore, it is prudent to establish some reasonable tolerance, such as 3 percentage points (e.g., a change of 6 percent for sold properties and 3 percent for unsold properties), before concluding that a meaningful problem exists. Such tolerance applies to other detection techniques discussed below.

D.2 Comparison of Average Unit Values

If sold and unsold parcels are appraised equally, average unit values (for example, value per square foot) should be similar. An appropriate test (Mann Whitney or t-test) can be conducted to determine whether differences are significant.

D.3 Split Sample Technique

In this technique, two ratio studies are performed, one using sales that occurred before the appraisal date and one using sales after the appraisal date, both adjusted for date of sale as appropriate. Except for random sampling error and any error in time adjustments, results of the two studies should be similar. Sales chasing is indicated if the results of the first study are consistently better than those from the second. In such a case, the second study is still valid; the first study should be rejected.

D.4 Comparison of Observed versus Expected Distribution of Ratios

Assuming the ratio studies are based on sales that have been properly adjusted for time and other factors, a strong indication of the likelihood of “sales chasing” can be obtained by computing the proportion of ratios that would be expected to fall within a particular narrow range of the mean given the lowest likely standard deviation (although this depends somewhat on the assumption of a normal distribution). For example, with a standard deviation of 5 percent given a normal distribution, about 32 percent of the ratios would be expected to fall within ± 2 percent of the mean (for example, between 98 and 102 percent, given a mean of 100 percent). Except in highly constrained or well-behaved real estate markets, many appraisers consider such a low standard deviation, corresponding approximately to a COD of 4 percent, to be unachievable. Regardless of the distribution of the ratios, the likelihood is extremely low that there would be a sufficiently representative sample with more than this proportion of ratios in such a narrow range. If such is the case, “sales chasing” is a likely conclusion. Sometimes other processes through which adjustments to assessments on selling parcels are more pronounced than on the population as a whole mimic the effect of sales chasing, such as more intensive reviews of sales than non-sales. Regardless of the practice, the

representativeness of the ratio study is called into question and additional tests should be instituted.

Although samples may not be normally distributed, in which case equivalently precise proportions of expected ratios around the median cannot be determined, the 32 percent concentration is very conservative. Finding such a high concentration of ratios around any measure of central tendency is a strong indicator of sales chasing or of a non-representative ratio study. In addition, when the distribution of ratios is bimodal or multimodal, similar significant concentrations of ratios around these modes can indicate selective reappraisal or sales chasing.

Table D-1 demonstrates the conservative nature of the 32 percent concentration. If the minimum achievable COD is, in fact, higher than 4 percent for the strata or property class being analyzed, then even lower concentrations could indicate sales chasing, and previously discussed investigative procedures should be instituted. One disadvantage to this procedure is that it can be misleading when applied to small samples. Therefore the method should not be employed for sample sizes less than 30.

Even when critical proportions of ratios shown in table D-1 are exceeded, further investigation should be conducted before concluding that sales chasing has occurred.

D.5 Mass Appraisal Techniques

Provided sales are sufficient in number, oversight agencies can develop mass appraisal models to apply to a random sample of unsold properties or to the population

of properties that are represented by the sold properties. An independent multiple regression or other automated calibration techniques can be used to develop the models. An appraisal ratio study is then conducted for the unsold parcels by using values predicted by the independent models as indicators of market values. This approach has the following advantages:

- It is objective and rooted in the market.
- The models can be reviewed for sufficient reliability before being applied to the unsold parcels.
- The technique yields measures of central tendency, which can be compared against those produced by the sales ratio study and tested for compliance with standards for the level of appraisal.
- The technique takes the form of an appraisal ratio study but avoids the time and expense of single-property appraisals.

Reliability of this method depends on the accuracy and independence of the mass appraisal models used to generate the value estimates. The models must be consistent with appraisal theory and reviewed for sufficient reliability by examining goodness-of-fit statistics. The models should be independent of those used for assessment purposes.

Table D-1. Example of critical ratio concentrations indicative of sales chasing or similar practices

Minimum achievable COD	Standard deviation assuming normal distribution and mean ratio of 100%	Critical proportion of ratios*	z score based on $\pm 2\%$ range (Absolute value)	Expected proportion of ratios below 0.98	Expected proportion of ratios below 1.02	Expected proportion between 0.98 and 1.02 (within $\pm 2\%$ of central tendency)
1.6%	2.00%	69	1.0000	0.1587	0.8413	0.6826
4.0%	5.00%	32	0.4000	0.3446	0.6554	0.3108
5.0%	6.25%	26	0.3200	0.3745	0.6255	0.2510
6.0%	7.50%	22	0.2667	0.3949	0.6051	0.2102
7.0%	8.75%	19	0.2286	0.4110	0.5896	0.1801
8.0%	10.00%	16	0.2000	0.4207	0.5793	0.1586
10.0%	12.50%	13	0.1600	0.4364	0.5636	0.1272
12.0%	15.00%	11	0.1333	0.4467	0.5530	0.1063
14.0%	17.50%	10	0.1143	0.4545	0.5455	0.0910
16.0%	20.00%	8	0.1000	0.4602	0.5398	0.0796

* Given the assumption that the COD shown represents the minimum achievable COD for the property type, class, or strata being analyzed with the ratio study, sales chasing (or a similar distortive procedure) is very likely if the concentration of ratios with $\pm 2\%$ of a measure of central tendency, such as the median or a mode, or 100%, equals or exceeds this value. This proportion is based on values of the standard normal distribution function and assumption that sample size is greater than 30. The critical number equals the integer immediately exceeding the expected proportion.

Appendix E. Alternative Uses for Ratio Study Statistics

In addition to the use of statistical measures to determine underlying assessment level and uniformity, comparisons between measures can provide useful information about sample representativeness, the distribution of the ratios, and the influence of outliers. For example, by comparing the mean and weighted mean, even without determining the PRD, the analyst should be aware that a large difference between these two measures indicates probable influence of atypical ratios on high-priced properties. This in turn could mean that outliers are still present in the sample and that the sample is not representative. Alternatively, it could indicate systematic appraisal error in the appraisal of properties within a particular price range. The geometric mean-to-mean relationship can provide similar information, especially about the presence of very low ratios, which have a greater influence on the geometric

mean. The relationship between the COD and COV can provide similar additional guidance. This standard chooses the COD as the primary recommended measure of uniformity. This choice reflects the expectation of non-normal distributions of ratios. Despite this consideration, it is useful to recognize that, in a normal distribution, the COV is approximately 1.25 times the COD. When the COV/COD ratio exceeds 1.25, the likely cause is a small number of very high ratios, which may again be non-representative.

It is incumbent on the analyst to review the ratio study sample to attempt to provide a representative sample. Comparisons of statistics, such as those given in this appendix, provide an additional tool to help the analyst in this regard.

Appendix F. Legal Aspects of Ratio Studies

Property taxation is governed by federal, state, and provincial constitutions, statutes, and administrative rules or regulations, many of which require uniform treatment of property taxpayers. Ratio studies play an important role in judging whether uniformity requirements are met. Relevant Canadian Federal statutes based on the Constitution Acts of 1867–1975 provide that municipal councils cannot discriminate between taxpayers of the same class within municipalities.

Relevant United States federal provisions include the Bill of Rights, the commerce clause of the United States Constitution, the Fourteenth Amendment, and the Tax Injunction Act (28 U.S.C. § 1341). Together they guarantee basic protections and due process while still granting states the authority to classify property and grant reasonable exemptions. Many constitutions have clauses that require uniformity in the assessment and taxation of property, although some jurisdictions, either by constitution or statute, permit certain differences between classes. Ratio studies provide a gauge of whether uniformity requirements are being met.

A key U.S. federal statute relating to ratio studies is the U.S. Railroad Revitalization and Regulatory Reform Act (“4-R Act”) of 1976 (49 U.S.C. § 11501). The 4-R Act requires that rail transportation property be assessed for tax purposes at no more than 105 percent of the assessment level of other commercial and industrial property in the same taxing jurisdiction. Similar federal statutes relate to air transportation property, motor carriers, and bus lines (49 U.S.C. §§14502 and 40116).

The 4-R Act provides that ratio studies be used to measure alleged discrimination. In such cases, as in any ratio study, the purpose of the study must be clearly defined and the study must be conducted so that it accurately evaluates the issues at hand. Important issues in ratio studies conducted pursuant to the 4-R Act include the proper definition of “other” commercial and industrial property, screening and adjustments to sales data, proper measures of the level of appraisal, and the combining and weighting of centrally valued and locally assessed properties.

Appendix G. Sales Validation Questionnaire

Parcel Identification Number _____	Instrument Number _____
Instrument Type _____	<input type="checkbox"/> Multi Parcel Sale <input type="checkbox"/> Split Sale Recording Date _____

Seller (Grantor) Name _____ Mailing _____ City/ST/ZIP _____ Phone _____ E-mail address _____	Buyer (Grantee) Name _____ Mailing _____ City/ST/ZIP _____ Phone _____ E-mail address _____
Brief Legal Description _____ _____ _____	Property/Situs Address _____ Name and Mailing Address for Tax Statements _____ _____

PLEASE ANSWER THE FOLLOWING QUESTIONS:

1. Special factors:
 - Sale between immediate family members:
SPECIFY THE RELATIONSHIP _____
 - Sale involved corporate affiliates belonging to the same parent company
 - Sale of convenience (correct defects in title; create a joint or common tenancy, etc.)
 - Auction Sale
 - Deed transfer in lieu of foreclosure or repossession
 - Forced sale or sheriff's sale
 - Sale by judicial order (guardian, executor, conservator)
 - Sale involved a government agency or public utility
 - Buyer (new owner) is a religious, charitable, or benevolent organization, school or educational association
 - Land contract or contract for deed
 - Sale of only a partial interest in the real estate
 - Sale involved a trade or exchange of properties
 - NONE OF THE ABOVE**
2. Check use of property at the time of sale:
 - Single Family Residence Agricultural Land
 - Farm/Ranch with Residence Vacant Lot
 - Condominium Unit Commercial/Industrial
 - Other: (Specify) _____
3. Was the property rented or leased at the time of sale? Yes No
4. Did the sale price include an existing business? Yes No
5. Was any personal property (such as furniture, equipment, machinery, livestock, crops, business franchise or inventory, etc.) included in the sale price? Yes No
If yes, please describe _____

- Estimated value of all personal property items included in the sale price \$ _____
6. Any recent changes to the property? Yes No
 - New Construction Demolition
 - Remodeling Additions
 Was the work performed by a professional? Yes No
 Date Completed _____/_____/_____
 Estimated cost of labor and materials? \$ _____
7. Was there a change in use? Yes No
If yes, please explain: _____
8. Does the buyer hold title to any adjoining property? Yes No
9. Was there an appraisal made on the property? Yes No
10. Were any **delinquent** taxes assumed by the purchaser?
 Yes—Amount \$ _____ No
11. Were the **delinquent** taxes included in the sale price?
 Yes No NA
12. How property was marketed (check all that apply):
 Listed with real estate agent Displayed a "For Sale" sign
 Advertised in the newspaper Offered by word of mouth
13. Was the property made available to other potential purchasers?
 Yes No
If not, explain _____
14. How long was the property on the market? _____
15. What was the asking price? _____
16. Date sales price was agreed upon _____/_____/_____
17. Method of financing (check all that apply):
 New loan(s) from a Financial Institution
 Name of lending institution: _____
 Cash down payment \$ _____
 Amount \$ _____ Interest rate _____% Term _____
 Assumption of Existing Loan(s)
 Amount \$ _____ Interest rate _____% Term _____
 Seller Financing
 Amount \$ _____ Interest rate _____% Term _____
 Trade of Property: Estimated Value \$ _____
 Describe Traded Property _____
 All Cash Not Applicable
18. **Total Sale Price** \$ _____
19. Was the sale influenced by any unusual circumstances?
 Yes No
If yes, please explain _____
20. Is the total sale price a fair reflection of the market value for the real estate on the sale date? Yes No If no, please explain _____

PRINT NAME - _____

SIGNATURE _____

GRANTOR (SELLER) Daytime Phone No. (____) _____

GRANTEE (BUYER) Daytime Phone No. (____) _____

AGENT Daytime Phone No. (____) _____

Assessment Standards of the International Association of Assessing Officers

JULY 2007

Standard on Ratio Studies

JULY 2007

Standard on Property Tax Policy

OCTOBER 2006

Standard on Mass Appraisal of Real Property

DECEMBER 2005

Standard on Valuation of Personal Property

AUGUST 2004

Guide to Assessment Administration Standards

AUGUST 2004

Standard on Manual Cadastral Maps and Parcel Identifiers

SEPTEMBER 2003

Standard on Automated Valuation Models

JULY 2003

Standard on Administration of Monitoring and Compliance Responsibilities

JULY 2003

Standard on Digital Cadastral Maps and Parcel Identifiers

JANUARY 2003

Standard on Facilities, Computers, Equipment, and Supplies

FEBRUARY 2002

Standard on Contracting for Assessment Services

JULY 2001

Standard on Assessment Appeal

JULY 2001

Standard on Public Relations

JULY 2001

Standard on Valuation of Property Affected by Environmental Contamination

DECEMBER 2000

Standard on Professional Development



To order any standards listed above or to
check current availability and pricing,
go to:<http://www.iaao.org/>

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State Board of Equalization
c/o Terry Rubald and / or Donna Proper
Department of Taxation
1550 College Parkway, Suite 115
Carson City, NV. 89706-7937

February 8, 2010

RE: Workshop on R153-09

Dear Sir / Madam,

Please review the attached comments on the proposed regulations under LCB file number R153-09, scheduled to be discussed in a workshop on February 11, 2010. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to be 'Les Barta', written in a cursive style.

Les Barta

PROPOSED SBOE REGULATIONS ON EQUALIZATION PER NRS 361.395
LCB FILE NUMBER R153-09

(1) Legal Standards

The requirements and standards for uniform and equal assessment and taxation under Article 10, section 1 of Nevada's constitution and Nevada's statutory scheme are set forth in State Bd. of Equalization v. Bakst, 122 Nev. 1403, 148 P.3d 717 (2006) . The constitutional requirement for uniformity is "**guaranteed**." State Bd. of Equalization v. Barta, 188 P.3d 1092, at 1102 (Nev. 2008). The constitutional guarantee of uniformity in assessment requires all assessment to comply with Tax Commission regulations. NRS 360.250(1) and NRS 360.280(1)(a). See Bakst, supra, 1410, 1413.

Compliance with these requirements requires the use of only those methods of valuation either expressly authorized by statute, or **expressly approved** for uniform statewide application in the regulations of the Nevada Tax Commission. Bakst id, 1409, footnote 13; Barta supra, 1101. This requirement applies to all assessments, including those made by the Department and the boards of equalization. NRS 360.250(1). NRS 361.375(10).

Unless an assessment or valuation method is authorized by statute, any valuation standard or method used to change or determine an assessment must be expressly approved by the Tax Commission as a regulation promulgated pursuant to NRS 233B in the administrative code. Under Nevada law, only the Tax Commission is authorized to establish valuation standards and methods.

Under NRS 361.395, the State Board is required to equalize the valuations established by "...all county assessors and county boards of equalization and the Nevada Tax Commission..." The State Board has the authority, therefore, to review and determine the validity of all assessments of taxable value and is required to apply the proper standards of law to equalize assessments throughout and within the counties and the state.

It must be the **predominant concern** of the State Board to ensure that the constitutional guarantee of uniformity is upheld. Barta supra, 1100-1102, at 1102. Accordingly, the predominant concern of the State Board must be to ensure that any valuations established by the aforementioned parties, including the Tax Commission itself, are based exclusively on assessment standards and methods expressly authorized by Nevada law.

Therefore, The Tax Commission has the sole authority to establish standards and methods of assessment and valuation, whereas the State Board is authorized and required to make sure that these standards and methods meet the constitutional standard for uniformity and are uniformly applied.

(2) Ratio studies

These regulations authorize the State Board to apply "ratio study" methodology to accomplish equalization of assessed values. The State Board's adoption of ratio study methodology for this purpose conflicts with statute and settled law as established by the Supreme Court in several respects:

(a) NRS 361.333 authorizes the Tax Commission to apply ratio studies to equalize assessment values statewide. There is no statute, regulation, or other legal authority which permits the State Board or any other party to apply ratio studies for this purpose or any other purpose. The Tax Commission does not have authority to assign or transfer its legal duties to another party or agency, and the State Board lacks any authority to assume the Tax Commission's statutory functions in any capacity. For the State Board to engage in precisely those functions required simultaneously of the Tax Commission would create serious conflicts of authority and would violate state law.

(b) Section 10 of the regulations authorizes the State Board to "adopt by reference" the "Standard on Ratio Studies" published by the IAAO. Section 11(c) authorizes the State Board to use ratio studies to "determine whether the taxable values specified in the tax roll of any county must be increased or decreased to equalize property valuations in this state." Section 14 authorizes the State Board to apply the IAAO standard on ratio studies to accomplish this, and Section 17 sets forth a specific methodology and specific standards to apply ratio study methodology to adjust and establish taxable values. As such, the regulations establish specific valuation methodology for use by the State Board to determine the taxable value of property. As shown above, pursuant to NRS 360.250(1) and NRS 361.375(10) the State Board is limited to the use of standards and methods expressly authorized by Tax Commission regulations. None of the aforementioned ratio study standards or methodologies is "expressly approved" in Tax Commission regulations. The State Board is not authorized to adopt its own valuation standards and methods. The adoption and / or use of any such valuation methods by the State Board would, therefore, expressly conflict with the constitutional requirement for uniformity in assessment.

(c) The State Board has previously maintained the validity of its reliance on the "generally recognized appraisal standards of the IAAO." However, this argument was expressly rejected by the Bakst Court, which held that "generally accepted appraisal standards" do **not** assure uniformity and are **not** an acceptable substitute for specific methods expressly approved by the Tax Commission for uniform statewide application. Bakst supra, 1416. Accordingly, any provision enabling the State Board to "adopt by reference" the standards of the IAAO would directly conflict with the holdings of the Supreme Court.

(d) The IAAO provides its own disclaimer on the use of its standard on ratio studies, declaring that these standards are only intended for use in the context of total market value assessment schemes. See attached. Accordingly, these IAAO ratio study standards would be inherently incompatible with Nevada's taxable value system.

(e) Equalization or remediation of values as contemplated by NRS 361.345 authorizes boards of equalization to raise or lower values to match the levels of similarly situated properties whose assessments are presumed to be correct. However, the boards of equalization are not authorized to establish new or different levels of value by means of methods which are not expressly approved by statute or Tax Commission regulations.

(3) Equalization of Methodology

As shown above, the Supreme Court has held that it must be the State Board's "**predominant concern**" to ensure that assessment are based upon uniform

methods “expressly approved” by Nevada law. The regulations do provide for the examination of methodologies by the State Board. However, the provision for equalization of methodologies is minimal and inadequate to address what the Supreme Court has identified as the boards of equalizations’ primary equalization function. Instead the regulations focus primarily on equalization of values through ratio study methodology - a process which is already prescribed by statute for exclusive application by the Tax Commission.

Section 17 of the regulations provides for a variety of optional remedies to address circumstances of inequitable relative levels of value. However, the regulations do not adequately address circumstances in which the State Board may have identified the use of nonuniform methodologies. The regulations do provide for discretionary reappraisal. However, in Bakst and Barta the Supreme Court declared that the proper remedy for unconstitutional assessments resulting from the use of nonuniform methodologies is to declare them void in excess of a prior level of assessment presumed to be valid (Bakst, supra 1409, Barta, supra 1097) with refunds for excess taxes (Barta, 1102; Bakst, 1416). Reappraisals would allow unconstitutional assessments to remain valid for an indefinite period, which contradicts the holdings of the Supreme Court. The regulations must reflect the law established by the Supreme Court, which held that unconstitutional methodology must be the predominant concern of the State Board.

(4) Due Process

Section 18 of the regulations provides for procedures in the event of a potential increase in assessed values. This section fails to provide adequate due process for taxpayers whose interests may be adversely affected. In addition to the 10 days notice specified by NRS 361.395, taxpayers must also be advised of the factual and legal basis of any potential change in assessment, so that they may have a fair opportunity to present evidence to defend their interests. Each affected party must additionally be provided with adequate opportunity to be heard, including reasonable hearing procedures for presentation and rebuttal of evidence.

(5) Conclusion

Because of the aforementioned conflicts with State law, in their current form these regulations are subject to effective challenge and will not provide a sound basis for the State Board to accomplish its duty under NRS 361.395.

2. Overview

For local jurisdictions, *ratio study* is used as a generic term for sales-based studies designed to evaluate appraisal performance. The term is used in preference to the term *assessment ratio study* because use of assessments can mask the true level of appraisal and confuse the measurement of appraisal uniformity when the legal assessment level is other than 100 percent of fair market value.

2.1 The Concepts of Market Value and Appraisal Accuracy

Market value is the major focus of most mass appraisal assignments. The major responsibility of assessing officers is estimating the market value of properties based on legal requirements or accepted appraisal definitions. The viability of the property tax depends largely on the accuracy of such value estimates. The accuracy of appraisals made for assessment purposes is therefore of concern, not only to assessors but also to taxing authorities, property taxpayers, and elected representatives. Appraisal accuracy refers to the degree to which properties are appraised at market value, as defined by professional standards (see *Glossary for Property Appraisal and Assessment* [IAAO 1997]) and legal requirements.

2.3 Uses of Ratio Studies

Key uses of ratio studies are as follows:

- measurement and evaluation of the level and uniformity of mass appraisal models
- internal quality assurance and identification of appraisal priorities
- determination of whether administrative or statutory standards have been met
- determination of time trends
- adjustment of appraised values between reappraisals

Assessors, appeal boards, taxpayers, and taxing authorities can use ratio studies to evaluate the fairness of funding distributions, the merits of class action claims, or the degree of discrimination (see Appendix F). However, ratio study statistics cannot be used to judge the level of appraisal of an *individual* parcel. Such statistics can be used to adjust assessed values on appealed properties to the common level.

Source: “Standard On Ratio Studies”, page 7
published 2007 by International Association of Assessing Officers (“IAAO”)