

# **Indiana Property Tax Equalization Study**

## **Background Tool Kit**

*Indiana  
Fiscal  
Policy  
Institute*



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## **Introduction**

The State of Indiana is completing a mass reassessment of all real property in accordance with the requirements of the Indiana Supreme Court set forth in the decision in State Board of Tax Commissioners v. Town of St. John and subsequent order of the Indiana Tax Court.

The Indiana Department of Local Government Finance (DLGF) laid out the reassessment rules and procedures in Indiana Administrative Code 50 IAC. The regulations require the reassessment to produce assessments that comply with the Supreme Court Decision and the Tax Court order; specifically, that they be “objectively verifiable.” Market value is the objectively verifiable standard which the reassessment must meet.

In addition, Indiana statute (I.C. 6-1.1-34) requires a School Assessment Ratio Study and the DLGF regulations require a state-wide, county-by-county report on both the processes used for and the results of the reassessment. Finally, the State needs a dynamic, accurate, consistent database for effective, ongoing property tax administration.

Therefore, the DLGF and the State Budget Agency have asked the Indiana Fiscal Policy Institute (IFPI) to perform a Property Tax Equalization Study that will provide the State with a determination of the strengths, weaknesses, and accuracy of the reassessment process and its results. The key features of the study are:

- A county-by-county analysis of the property tax equalization performed by the counties,
- A school assessment sales ratio study,
- An analysis, by jurisdiction, of the tax burden shift between classes of property,
- An analysis, by jurisdiction, of tax bill changes and property class,
- A study of the assessment methodology and process, with recommendations for improvements in future years,

- An analysis, by jurisdiction, of the effects on tax bills of levy increases, and
- An analysis of the data requirements for future property tax reassessments.

This Toolkit provides background material for local government officials, members of the media, and taxpayers to assist in their understanding of the objectives of the study and the process the IFPI used to conduct it. It includes an explanation of the need for the study, discussion of property tax administration and analysis concepts, and definitions of terms.

### **Why is an independent ratio study needed?**

First, the Indiana Constitution requires that property tax “assessment and taxation” be “uniform and equal.” It is the State’s constitutional responsibility to administer the property tax system such that local governments perform the ministerial duties of assessment and tax collection in accordance with state law. In State Board of Tax Commissioners v. Town of St. John, the Supreme Court mandated a market value based assessment standard.

Therefore, the State’s responsibility is to ensure compliance, by the local assessors, of the DLGF’s reassessment rule. Since the Supreme Court mandated that assessments be objectively verifiable, an independent study that measures the relationship between assessments and market value is required to determine compliance by the local assessors. The best method to make that determination is an independent ratio study.

Second, a ratio study essentially is an audit of the quality of an assessment. A cursory review of county equalization studies revealed several things that called into question their general reliability. The following problems were noted:

- There were variations in study methods, and some studies used non-standard statistics.<sup>i</sup>
- There seemingly are discrepancies in the numbers of properties in the various mandated strata.<sup>ii</sup>
- There were discrepancies in the numbers of sales considered usable in the studies.

- At least as furnished by the state, most studies were poorly documented.
- Most important, the reported statistics too often were incredibly good, which lowered confidence in the county studies.

## **Background, Definitions, and Explanation of Concepts**

Taxation is integral to civil society, and public finance experts usually recommend property taxes to bring diversity to, and help balance, a state and local revenue system. When public revenues come from several types of taxes and other sources of revenue, it is easier to find a balance among competing policy objectives, weather economic difficulties, and compete effectively in the global economy. A tax on the current market value of real property is an important part of such a system, because a market value-based property tax has a comparatively stable and reliable base, which is attractive during troubled economic times (see the box on the next page for a discussion of market value in the Indiana property tax system).

Property value can be a measure of a taxpayer's wealth or ability to pay. A real property tax is an especially suitable source of revenue for local governments. The immovability of the tax base makes clear which government is entitled to the tax revenue. If the property is security for the tax, it cannot be evaded. In addition, many local government services are provided to properties or to their owners and occupants. The tax captures for local government some of the increases in the value of land that are partially created by public expenditures, such as streets and highways, water and sewer, public safety, etc. Further, a dedicated source of revenue promotes local autonomy. Finally, the visibility of property taxes focuses attention on the overall quality of governance and promotes accountability.

### **What is market value?**

There are many legal and textbook definitions of market value. In valuation theory however, *market value* essentially is an *expected price*—the price for a property that the seller and an unrelated buyer would most likely agree to in an open market. The definition of market value also carries the assumption that both parties were reasonably well informed about how the property could be used in the future and about prices for similar properties. Furthermore, it would be assumed that neither was under any unusual pressure to buy or sell.

## How is market value for property tax purposes determined?

*Valuation* or *appraisal* is the activity of *estimating* what property values are. In essence, part of the job of an appraiser is to look at properties the way typical buyers and sellers would. Although many methods may be used to estimate market values, professional appraisers have agreed to standard procedures and methods (discussed below), which require them to work systematically, document their work, and communicate their opinions of value clearly. *Assessment* is the act of officially determining the value estimate to be used as the basis for taxation; the specialist appraiser who has the responsibility for making these determinations is an *assessor*.

*Real estate markets* reflect the ways people who want to buy or sell real estate think and act. Tracts of land may be used for such purposes as quiet enjoyment, agriculture, exploitation of mineral resources, and development either immediately or eventually. Developed land (land with buildings and other structures) may be used for housing or for carrying out economic activities. A person may want to own real estate to use it for such purposes directly or to rent it to others. One reason for owning real estate is to receive the rental income it can generate. Another reason to own real estate is the hope that it will appreciate in value. Of course, real estate may be held for more than one purpose. The important point is that the real estate market naturally is segmented, and an important valuation activity is deciding how to best estimate its market value.

### ***Indiana’s property tax assessment standard: True tax value***

The meaning of “true tax value” seems subject to interpretation. A common interpretation is that it is “market value in use.” For properties whose future use would be the same as the current use, market value and true tax value is the same thing. When the future use would be different from the current use, true tax value can be inferred from the market value of similar properties whose use is unlikely to change or that are not subject to the same economic pressures, whether positive or negative. Indiana courts have ruled that true tax values must be “objectively verifiable”—hence the need for the tax equalization study.

In appraisal practice, there are three basic “approaches” to estimating market values. These reflect market participants’ behaviors and the resulting evidence of market values.

- The *sales comparison approach*: Gathers information on recent open-market sales prices of similar properties<sup>iii</sup>, analyzes why their

prices differ, and uses that information to estimate the value of each appraisal property<sup>iv</sup>. It provides the best way to appraise residences and vacant land plots.

- The *income approach*: Uses the estimated future income stream over the remaining economic life of a property and uses a rate-of-return on investments of comparable risk to “capitalize” the income stream into a present value as of the appraisal date. It provides an excellent way to appraise properties that commonly are rented.
- The *cost approach*: Combines three components: the replacement cost of improvements *minus* accrued depreciation *plus* land value, which are separately estimated. Replacement cost is what it would cost to replace the existing structures and other improvements with new construction. Accrued depreciation is the loss in value due to physical depreciation, functional obsolescence, and economic obsolescence. Land value is what vacant land with the same characteristics and allowable uses would sell for in the open market<sup>v</sup>.

Appraisal standards recommend using as many of the approaches as is practical. Theoretically, all three approaches would yield the same estimate of value. However, market imperfections, data limitations, differences in appraisal skills, and other factors conspire to produce differing value estimates in practice. Consequently, appraisers must evaluate the strengths and weaknesses of the above approaches and chose the figure that is most appropriate in the circumstances. This process is known as “reconciliation”.

Although the summary above has not provided the details, all three approaches to value require analysis of available sales of comparable properties. This requires assessors to collect information on sales of real estate in their jurisdictions (and desirably to consider comparable sales from other areas as well). Each sale should be evaluated (or screened) to determine whether it is usable in appraisal (that is, meets the criteria of an open-market, arm’s-length sale) and whether it is usable in ratio studies (discussed below). To help with this process, Indiana law requires buyers and sellers to complete a sales disclosure form.

The *purpose* of an appraisal greatly affects how the appraisal should be conducted. Two factors especially affect appraisals for property tax purposes: (1) the need for efficiency in the appraisal process and (2) the need to treat taxpayers consistently.

#### ***Mass appraisal in Indiana***

The 2002 Real Property Assessment Manual, which Indiana township and county assessors are required to use, lays out a framework for a mass appraisal system. System specifications reinforce it. The cost approach is the default valuation approach.

Efficiency is warranted because the costs of administering a tax should be kept to a minimum.<sup>vi</sup> Relative to most other purposes for commissioning an appraisal (such as determining the price of a property or whether the property provides sufficient collateral for a mortgage), the amounts at stake in a property tax appraisal (the taxes in question) are low. Consistency is warranted for the intended goal of equity and for quality assurance. So-called “mass appraisal” methods serve both goals. As defined by the International Association of Assessing Officers, mass appraisal is “the process of valuing a group of properties as of a given date, using standard methods, employing common data, and allowing for statistical testing.” Modern mass appraisal relies considerably on computer support.

### **What does “equalization” mean and why is it needed?**

“Equalization” is a loosely used term in property tax administration. Formally, equalization is used to describe processes by which an agency with authority over two or more assessment districts (like the Indiana Department of Local Government Finance) makes adjustments to total assessments in the districts so that the assessments within the agency’s jurisdiction all bear the same relationship to total market value.

Informally, property tax officials may use “equalization” as a synonym for reassessment, review of assessments, or deciding assessment appeals. Equalization, as defined above, also is known as *inter-jurisdictional* equalization. Sometimes equalization agencies have authority to adjust total assessments of classes of property within an assessment district; this is known as *intra-jurisdictional* equalization.

Equalization programs sometimes are classified as “direct” or “indirect,” although the distinction may be blurred in certain instances. In direct equalization, by application of an equalization factor or reassessment order,

the equalization agency causes local assessments to be changed. In indirect equalization, neither local assessments nor local taxes are affected; the equalized value estimates merely figure in aid distribution formulas and the like.

States “equalize” property tax assessments for three main reasons:

- To ensure that local governments comply with the law – that is, to ensure equitable treatment of taxpayers under the law.
- To ensure that taxpayers benefit equally from state-mandated exemptions.
- To improve the allocation of state aid.

In order to have a rational basis for equalization, measurement of the quality of property tax assessments must be performed. Ratio studies provide that rational measurement by analyzing property tax assessments.

### What is a “ratio study”?

Here we consider only basic concepts; later we consider some of the issues involved. A “ratio study” is an investigation of how closely the *appraisals* that underlie property tax assessments approach *market values* and how consistent those appraisals are across all property. As will be illustrated through an example later, there are two principal concerns:

1. Level – Do the assessments meet the State’s standard? In other words: on average, how close are the assessments to market value?
2. Uniformity or Consistency – How close are individual assessment ratios to assessment ratios across all property?

A ratio study is a form of applied statistical analysis. This means that conclusions are drawn about the overall *quality of assessments* on the basis of data about a sample of properties—those that happen to have sold on the open market. For those

#### *Two views of statistics*

“There are three kinds of lies: Lies, damned lies, and statistics.”

Benjamin Disraeli (1804-1881)

“Statistics is a body of methods for making wise decisions in the face of uncertainty.”

W. Allen Roberts and Harry V. Roberts,  
*Statistics: A New Approach*, 1956

conclusions to be valid, certain conditions need to be met. This also means that uncertainty cannot be completely dispelled. Judgment always is needed in interpreting the results of a ratio study.

### **What are the steps in completing a ratio study?**

The main steps in a ratio study are: (1) assemble the data, (2) determine the study groups (“strata”), (3) make statistical analyses, (4) evaluate results, and (5) report the results.

*Data assembly* - the most labor-intensive phase of a ratio study - requires:

1. Collecting raw sales data—in Indiana the primary source of sales data is the sales disclosure form that buyers must file. Other sources may be used.
  - Key data are computerized; quality checks are made.
  - Screening the sales to determine whether a particular sale should be used in the ratio study—recall that only open-market, arm’s-length sales provide reliable evidence of market values. Family sales, foreclosure sales, and the like often do not. In addition, sales that would produce extremely high or low sales ratios are excluded. These are called “outliers.”
  - Matching the sale price with an assessment. In doing this, it is important to determine whether the property that was sold essentially is the same as the property that was assessed. A sale can take place any day of the year, while assessments are as of a single date. If significant physical changes to a property took place between the two dates, the sale cannot be used to evaluate the quality of the assessor’s appraisal.
  - Making necessary adjustments to reported sales prices. Sometimes adjustments to actual sales prices are warranted to make the evaluation of assessments fairer. For example: If a sale included significant personal property that was not considered in the real property assessment, the estimated value of the personal property inflates the price above market value. Such distortions should be removed. After these steps have been completed, the sales file is ready for analysis.

2. *Stratification.* Recalling that the real estate market is naturally segmented and that different methods may be used to appraise different types of property, a better picture of assessment performance can be obtained if different subsets of property are studied separately. This is called “stratification.” Common subsets (“strata”) are the main types of property—residential, commercial, industrial, agricultural, and vacant land. In equalization, different taxing districts may be studied separately.
3. *Data analysis.* After data assembly and stratification, analysis can begin. The next section discusses and illustrates the main statistical computations using a fictitious data set.
4. *Evaluation of results.* When a sample of sales is small, when it does not represent the total makeup of the total assessment roll well, and when the variation in sales ratios is great, ratio study statistics may not reliably portray the quality of appraisals. The same is true if appraisals of parcels in the ratio study sample are adjusted so that they approximate sales prices (so-called “sales chasing”), with the result being ratio study statistics that imply quality appraisals. Another method of misrepresenting the quality of appraisals is to select for inclusion in the sample only sales with “good” ratios (“cherry picking”). Analysts should consider such possibilities before drawing conclusions based on ratio study statistics about the quality of appraisals.
5. *Reporting.* The final step in a ratio study is to report the results. What is reported will depend on the purpose of the study and the audience. More detail is required when the audience includes non-specialists. It often is helpful to compare observed performance with standards of performance, such as those promulgated by the International Association of Assessing Officers.

### **How are ratio-study statistics calculated and what do they mean?**

When actual sales are used as evidence of market values, the investigation is known as a “sales ratio study.” A sales ratio ( $R$ ) is formed by dividing the appraised value ( $A$ ) by the sales price ( $S$ ). For example, if a property was appraised for \$148,000 and it was sold for \$154,000, the sales ratio would be:

$$R = A / S = 148,000 / 154,000 = 0.961.$$

That is, the appraisal is 96 percent of the sale price. In a ratio study, sales ratios would be calculated for all the sales that were deemed usable and patterns in the ratios would be examined.

Table 1: Data used to illustrate calculation of basic ratio study statistics

<i>Sample sales data to illustrate the calculation of ratio study statistics</i>	ID	Assessment	Sale Price	Ratio
	No. (1)	(2)	(3)	(4)
The adjoining nine sales will be used to show how ratio study statistics are calculated. They have been randomly selected from a data set of 75 sales that has been concocted to illustrate both calculations and points.	61	99,200	772,000	0.128
	3	28,000	59,250	0.473
	16	54,110	99,000	0.547
	20	36,320	63,300	0.574
	<b>27</b>	<b>50,560</b>	<b>70,500</b>	<b>0.717</b>
	29	61,360	78,000	0.787
	33	58,080	69,000	0.842
	68	182,000	153,000	1.190
	57	160,000	129,600	1.235
	Total	729,630	1,493,650	6.493

The statistics calculated in ratio studies mainly deal with the *level* of value (assessment) and the *uniformity* of values as previously noted. Another area of statistical inquiry is whether the primary statistics described below may be considered *reliable*. Level of value is measured by a *measure of central tendency*, such as the *median*, the common *arithmetic mean*, and the *weighted mean*. There are several aspects to uniformity. If the question is whether two or more groups of property are valued uniformly, measures of central tendency are compared. If the question is whether all the properties in a group are valued uniformly, a *measure of variability* is calculated. The *coefficient of dispersion* is the chief measure used. Sometimes, the concern is whether high-value properties and low-value properties are valued uniformly. The *price-related differential* is used here.

- *Median*—the median ratio is the *middle* sales ratio when the ratios are arrayed in order of magnitude. When the total number of sales is even, the median is the arithmetic mean of the two middle-most ratios. In table 1, the sales ratios in column 4 have already been arrayed from lowest (0.128) to highest (1.235). The middle ratio (the median) is that of the fifth sale (ID no. 27), which is 0.717. If the sale with ID

no. 57 were not in the sample, the median would be the average of the ratios of sales 20 and 27, which would be 0.646 ( $[0.574+0.717]/2$ ). The value of the median is unaffected by the values of the ends of the array. For this reason, the median generally is the preferred measure of central tendency when evaluating the quality of a reassessment.

- *Arithmetic mean*—the arithmetic mean is the sum of the individual ratios divided by the number of ratios. If the nine ratios in table 1 were added, they would total 6.493, the average of which would be 0.721. Although not evident from this small sample of nine sales, the value of the mean is strongly affected by the values of the extreme ratios. Hence, it is not relied upon in sales ratio studies.
- *Weighted mean*—the weighted mean ratio is the sum of the appraisals (assessments) divided by the sum of the sales prices. In table 1, the sum of appraised values (column 2) is 729,630, and the sum of the sales prices (column 3) is 1,493,650. Dividing 729,630 by 1,493,650 results in a ratio of 0.488. As inspection of table 1 would reveal, this ratio is heavily influenced by sale 61, which sold for \$772,000. This dollar-weighting feature makes the weighted mean the preferred measure of central tendency when the objective is to estimate to total market value of a district (as in indirect equalization).
- *Coefficient of dispersion*—the coefficient of dispersion (COD) measures the average percentage deviation of individual ratios from the median ratio. The lower the COD, the more uniform the appraisals. Table 2 (below), which is derived from table 1, illustrates the calculations.
  1. subtracting the median from each ratio (result in column 3),
  2. taking the absolute value (negative signs are ignored) of the differences (result in column 4),
  3. summing these values (result = 2.332),
  4. dividing by the number of ratios to obtain the “average absolute deviation” ( $2.332 / 9 = 0.259$ ),

5. dividing by the median ( $0.259 / 0.717 = 0.361$ , and
6. multiplying by 100 to express the results in percentage terms (result = 36.1%).

Table 2: Calculation of the coefficient of dispersion (COD)

ID No. (1)	Ratio (2)	Ratio- Median (3)	Absolute Value (4)
61	0.128	-0.589	0.589
3	0.473	-0.245	0.245
16	0.547	-0.171	0.171
20	0.574	-0.143	0.143
27	0.717	0.000	0.000
29	0.787	0.070	0.070
33	0.842	0.125	0.125
68	1.190	0.472	0.472
57	1.235	0.517	.0517
		Sum =	2.332
Average Absolute Deviation:		$2.332 / 9$	= 0.259
Coefficient of Dispersion:		$0.259 / 0.717$	= 0.361
COD expressed as percentage:		$0.361 * 100$	= 36.1%

- *Price-related differential*—the price-related differential (PRD) is the mean ratio divided by the weighted mean ratio. The PRD of the nine ratios in table 1 is 1.477 ( $0.721/0.488$ ). PRDs close to 1.0 signify uniform appraisals. If the PRD is much above 1.0 (as is the case here), high-value properties tend to be valued at a lower percentage of value than low-value properties. This is known as “assessment regressivity.” PRDs much below 1.0 signify “progressivity.”

## Endnotes

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- <sup>i</sup> Computational errors also were noted.
- <sup>ii</sup> Some studies provided no information on the numbers of properties in each stratum making it impossible to determine whether omitted strata should have been studied.
- <sup>iii</sup> Referred to as “comparables.”
- <sup>iv</sup> also known as the “subject property.”
- <sup>v</sup> Although it is the least direct approach, the cost approach often is the default valuation approach because it was the first mass appraisal approach to be developed and because data on replacement costs are inexpensively available from specialist publishers.
- <sup>vi</sup> Adam Smith’s fourth canon of taxation states “Every tax ought to be so contrived as both to take out and keep out of the pockets of the people as little as possible, over and above what it brings into the public treasury of the state” (*Wealth of Nations*, 1776).

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