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The offer from the Austin Board of Realtors is disingenuous. It would be illegal for us to change market values without having the data to support those changes. Using aggregate data to do across-the-board increases would violate the Texas Property Code, International Association of Assessing Officers Mass Appraisal Standards, and Uniform Standards of Professional Practices. Travis County property owners deserve better. During a time where property owners are struggling with affordability issues, every dollar matters. We cannot and will not increase property values without the data to support it. We are required to appraise properties at market value and the only way to determine that is by using market data. Despite our efforts to collect data from a variety of sources, the limited data we have does not indicate any change in current market values. We remain committed to working with our taxing entities to find a solution to this issue that is legal and fair for Travis County property owners.

Attribute to: Marya Crigler, Chief Appraiser of Travis Central Appraisal District

Texas Property Tax Code - Sec 5.05 Appraisal Manuals and Other Materials

- (a) The comptroller may prepare and issue publications relating to the appraisal of property and the administration of taxes, or may approve other publications relating to those matters, including materials published by The Appraisal Foundation, the International Association of Assessing Officers, or other professionally recognized organizations, for use in the administration of property taxes, including: (1) a general appraisal manual;
- (2) special appraisal manuals as authorized by law;
 - (3) cost, price, and depreciation schedules as authorized by law;
 - (4) periodic news and reference bulletins;
 - (5) an annotated version of this title and Title 3; and
 - (6) a handbook containing selected laws and all rules promulgated by the comptroller relating to the property tax and its administration.

International Association of Assessing Officers - Standard on Mass Appraisal of Real Property

3.4 Sale Data

States and provinces should seek mandatory disclosure laws to ensure comprehensiveness of sale data files. Regardless of the availability of such statutes, a file of sale data must be maintained, and sales must be properly reviewed and validated. Sale data are required in all applications of the sales comparison approach, in the development of land values and market-based depreciation schedules in the cost approach, and in the derivation of capitalization rates or discount rates in the income approach. Refer to Mass Appraisal of Real Property (Gloude-mans 1999, chapter 2) or Fundamentals of Mass Appraisal (Gloude-mans and Almy 2011 chapter 2) for guidelines on the acquisition and processing of sale data.

Texas Property Tax Code - Sec 23.01 Appraisals Generally

(b) The market value of property shall be determined by the application of generally accepted appraisal methods and techniques. If the appraisal district determines the appraised value of a property using mass appraisal standards, the mass appraisal standards must comply with the Uniform Standards of Professional Appraisal Practice. The same or similar appraisal methods and techniques shall be used in appraising the same or similar kinds of property. However, each property shall be appraised based upon the individual characteristics that affect the property's market value, and all available evidence that is specific to the value of the property shall be taken into account in determining the property's market value.

Uniform Standards of Professional Appraisal Practice - Standard 5-5

In developing a mass appraisal, when necessary for credible assignment results an appraiser must:

- a. Collect, verify and analyze such data as are necessary and appropriate to develop:
 - i. The cost new of the improvements
 - ii. Depreciation;
 - iii. Value of the land by sales of comparable properties;
 - iv. Value of the property by sales of comparable properties
 - v. Value by capitalization of income or potential earnings (i.e., rentals, expenses, interest rates, capitalization rates, and vacancy data);

Comment: This Standard rule requires appraisers engaged in mass appraisal to take reasonable steps to ensure that the quantity and quality of the factual data that are collected are sufficient to produce credible appraisals. For example, in real property, where applicable and feasible, systems for routinely collecting and maintain ownership, geographic, sales, income and expense, cost, and property characteristics data must be established. Geographic data must be contained in as complete a set of cadastral maps as possible, compiled according to current standards of detail and accuracy. Sales data must be collected, confirmed, screened, adjusted, and filed according to current standards of practice. The sale file must contain, for each sale, property characteristics data that are contemporaneous with the date of the sale. Property characteristics data file must contain data contemporaneous with the date of the appraisal including historical data on sales, where appropriate and available. The data collection program must incorporate a quality control program, including checks and audits of the data to ensure current and consistent records.