Question/Comments and Answers

Summary

Three topics generated the majority of feedback in the Phase II scenarios: (1) SDF integration with tax and billing systems, (2) the tax and billing to CAMA integration including auditor's values and bucket allocations, and (3) the tax and billing to CAMA integration including homestead information.

First, the Department removed the SDF to tax and billing integration scenarios. County practices vary significantly in the way SDF data entry occurs, which made integrating data to create efficiencies too difficult to implement. The fact remains that data entry from the SDF is made in some counties up to four times. Therefore, although the Phase II scenarios will not include an integration of data from SDF to the tax and billing system, the Department still encourages counties and vendors to work toward finding efficiencies in the processing. The scenarios still require SDF to CAMA integration, which should resolve the largest burden on counties.

Second, the Department has received comments on the integration of values, bucket allocations and homestead status from tax and billing to CAMA and has taken these comments under advisement. Upon further consideration, the Department believes these requirements are needed. These requirements are in no way designed to disrupt the operations or responsibilities of the county offices; rather, these software requirements will occur behind the scene and involve little change in office responsibility. The tax and bill system will automatically generate the integration files. The CAMA system will automatically store the changes. The tax and billing to CAMA integration tests may necessitate additional programming work on the part of vendors, but the end users in the county offices will be able to access more real-time, integrated data.

Historically, one of the most problematic issues with data compliance is the timing differences between the submission of assessor's files and auditor's files. Specifically, the majority of changes to gross assessed values in the current tax year are not made in the assessment system for values in the current tax year. Requiring the tax and billing to CAMA integration to also include changes to gross assessed values will enable the CAMA system to run reports outlining value differences at any given point in time. Additionally, looking ahead, the Department could amend the file formats in the PARCEL file to include the data that these integration testing scenarios are examining. Assessing officials should note that auditor's values and allocations from the tax and billing system are for informational-purposes only and should not overwrite postings in the CAMA system; rather, the values and allocations from the tax and billing system are only required to be stored and displayed as a separate field. Furthermore, with the constitutional property tax caps, the assessed value allocations have become an area where assessors and auditors need further coordination. Allocation of assessed values is a responsibility that does not fall entirely to one office. Increasing the coordination between the assessment and tax and billing systems in allowing the current values to integrate further will help officials in both the assessor's office and auditor's office identify potential discrepancies in values and allocations.

Third, in the Phase I scenarios under both 50 IAC 23 and 50 IAC 26, the CAMA system is required to have an indicator that signifies whether a homestead is filed on the property. Particularly, in 50 IAC 26 Phase I testing, CAMA vendors are required to demonstrate that their systems include a homestead indicator for eligible records and ensure that those records include a portion of their AV under the 1% tax cap allocation. Including the homestead status in the integration will enable the CAMA system to accurately include this field with no additional data entry work from the assessor.

Question/Comments and Answers

From

Question/Comment: L.L. Low Associates

It appears that the terms 'Tax Management System' and 'Tax & Billing System' are being used interchangeably in the scenarios. Our understanding is the 'Tax Management System' is made up of the 'CAMA/Sales Disclosure System' and the 'Tax & Billing System'.

Answer:

This is correct; these two terms are distinct. The tax and billing system represents one module of the overall Property Tax Management System. The Department has reviewed the Phase II testing scenarios and corrected the document for any inconsistencies in the usage of these terms. Any revisions are reflected in the finalized version of the Phase II testing scenarios, which is posted to the Phase II Vendor Certification webpage.

From

Question/Comment: L.L. Low Associates

When considering creating new, or making changes to existing file formats/structures we think it is important for the DLGF to consult with the vendors to determine what their required fields/information needs are. True, some of the vendor's required fields may hold no relevance to the DLGF's data gathering and processing, but they are vital to how our systems operate and directly relate to the programming that is in place to comply with past and future certification of these systems. Example: 'MOBILE' and 'PERSPROP' files that require a 'Supplemental file' defined and agreed to by vendors so we could comply with certification integration requirements. Real Estate also uses a vendor defined and agreed upon file format for Tax-to CAMA processing so we could comply with those certification integration requirements.

Answer:

The Department is in agreement that when amending file formats in 50 IAC 26, input from vendors is very valuable. As such, before formally initiating proposed changes to the file formats for OILGAS and OILGASALL last fall, the Department consulted with all the oil and gas vendors to seek their input on the proposed changes. Their input helped the Department formulate the proposed format changes to these two files. Additionally, another opportunity to provide input regarding the proposed changes was provided during the advertised public hearing. The Department will continue to seek input from vendors whenever it intends to make amendments to the file formats in 50 IAC 26 and encourages vendors to provide their ongoing feedback regarding concerns and/or suggestions on the file formats.

Question/Comments and Answers

From

Question/Comment: Thomson Reuters

In the CAMA to Tax and Billing Interface Test Area, for Test 1(c), traditionally, the CAMA system has not been a source for the storage of net assessed values (NAV), later used for tax billing purposes. This value, calculated by the Tax and Billing system, is not finally determined until just before tax values are produced. This test requirement would then presume to have a subsequent and reciprocal export/import process (Tax -> CAMA) that is superfluous and not consistent with actual jurisdictional practices. CAMA systems are concerned only with Gross Assessed Values.

Answer:

In this scenario, CAMA vendors are asked to maintain gross assessed values as opposed to net assessed values. We understand that traditionally this was not done, but with the changes in the importance of property tax cap allocations the Department believes this is useful and is justified under 50 IAC 26-15-1.

From

Question/Comment: Thomson Reuters

This question addresses CAMA to Tax and Billing Interface Test Area test 1(g), the Personal Property to Tax and Billing Interface Test 1(c), and In the Mobile to Tax and Billing Interface Test 1(f).

Please provide further clarification on the practical application of these tests in a production environment. It is unclear as to whether or not the DLGF is expecting a software mechanism to be triggered; allowing a roll of certified gross assessed values once approval is provided. Or, does the DLGF envision that this would be a support intervention; requiring back office database modification? Furthermore, is this more explicitly applicable to the Tax and Billing component of the system?

Answer:

Similar to the procedure instituted under 50 IAC 23, the Department has requested that if a county chooses to re-roll values, that they receive approval from the Department to re-certify gross assessed values. Under 50 IAC 26, in this testing scenario, the Department is requiring that vendors on the tax and billing side do not allow the re-roll without approval, in a process controlled by the vendor.

From

Question/Comment: Thomson Reuters

In the "Re-Roll" of Certified Gross Assessed Values Test Area, with authorization of a "re-roll", is there any further expectation on the part of the DLGF that the roll from the prior and now obsolete roll, should be retained? Based on the language in Test Areas 1 - 4, it would seem that this would in fact need to be a complete replacement of the "original roll". Otherwise, the count of value records applicable to a given year could become quite unmanageable.

Answer:

In the event of a Department-authorized "re-roll" of certified gross assessed values, the previous invalid values do not need to be retained.

Question/Comments and Answers

From

Question/Comment: L.L. Low Associates

In the Mobile to Tax and Billing Interface Test Area and Personal Property to Tax and Billing Interface Test Area, the supplemental files for the MOBILE and PERSPROP files are not mentioned.

Answer:

Supplemental files contain fields that are outside the purview of those specified in 50 IAC 26-20. As such, the Department cannot require that data contained in the supplemental files be interfaced from the assessment system to the tax and billing system. The Department recognizes that tax and billing vendors may use additional information to fully demonstrate certification testing, namely in Phase I during the calculation of tax bills. The Department has provided supplemental files for both PERSPROP and MOBILE files as part of the 50 IAC 26 data bundle to help meet this objective. To the extent that data contained in the supplemental files may be helpful, tax and billing vendors may use these supplemental files.

From

Question/Comment: L.L. Low Associates

In the Oil and Gas to Tax and Billing Interface Test Area, this test requires use of OILGAS and OILGASALL files which we just received an updated version which still does not include all of our required fields. We currently have a single, programmed and working, vendor agreed upon format/structure which is still different from the new formats/structure. Will the currently in use file format/structure be acceptable for continued use as it still contains all the needed Tax & Billing System fields for interface?

Answer:

Oil and gas vendors will have to be able to import the data from the OILGAS and OILGASALL files provided in the data bundle, and in turn, will have to generate the OILGAS and OILGASALL files per the file specifications in 50 IAC 26-20 (using the recently amended version of the rule). Tax and billing vendors will have to show that they can take the data contained in the OILGAS and OILGASALL files and interface the data into their systems. The Department will leave the technical programming of the interfacing of the data to the discretion of the vendors. To the extent that the tax and billing vendor may need additional data from the oil and gas assessment system in order to demonstrate the Phase II tests, the vendor may use a supplemental file while conducting the interface. However, the Department cannot require that the oil and gas assessment system produce a supplemental file or that the tax and billing vendor import the data from said file.

From

Question/Comment: Thomson Reuters

In the Tax and Billing System Post Certification Lock Guidance Test Area, should it be presumed that any subsequent corrections in the Tax and Billing software would simply replace a prior correction as opposed to an ongoing series of separate value records?

Answer:

Per the requirements of 50 IAC 26-14-2 and 50 IAC 26-15-5, a separate posting must be created if there is an allowable change to a certified gross assessed value following the interface of the data from the assessment system to the tax and billing system. Original certified values must be maintained.

Question/Comments and Answers

From

Question/Comment: L.L. Low Associates

At the start of the Integration section of the Phase II testing scenarios, what is expected when adding the deductions to a real property record as requested by the evaluator? Deductions are not transmitted to the assessor as they do not care or need them. To make such a data flow a new file format/structure and procedures would be required. In addition changing the process and data flow would cause undue confusion for the county personnel and accepted procedures.

Answer:

The test is not altering the procedures of deductions originating in the auditor's office; rather, the test is asking tax and billing vendors to apply a standard homestead deduction to a real property record and verify that upon integration of the information, the CAMA system imports the information. This test represents a continuation of what CAMA vendors are required to demonstrate in Phase I testing per the requirements of 50 IAC 26-13-5.

From

Question/Comment: Xsoft

In the Sales Disclosure Data Integration to CAMA Software Test Area, for Tests 1-2, for the majority of XSoft (INcama) users; those that are using INcama's Sales Disclosure module, the module is already integrated with the CAMA system--it is all part of the same software and database. In a few instances, users are utilizing either a third party product (e.g., AS2) or are entering Sales Data directly onto the DLGF sales disclosure website. In the first case, there is nothing to integrate since it is by default already integrated. In the other cases, we have an import tool that allows users to import sales data from the three DLGF Sales Disclosure file formats (i.e., SalesDisc, SaleContac, SaleParcel). For purposes of this test, will AS2 (in addition to the DLGF) have to be present at testing and prepare such files in order to show how we import the sales data into INCama? It should also be known that if the files we are provided are not in the proper format or if there are data issues the files will not import.

Answer:

In order to be Phase II certified, all applicable combinations of assessment and tax and billing systems must demonstrate the functionality required. In other words, Xsoft's sale disclosure module would need to demonstrate that it can integrate its data with its CAMA module per the Phase II testing scenarios. Likewise, the same would apply to the integration between the State's Sales Disclosure system and Xsoft's CAMA module and between AS2's Sales Disclosure system and Xsoft's CAMA module. In terms of the files that will be used for Phase II testing, vendors will be using the Department-provided data bundle. Vendors have been given the opportunity to review the data bundle and provide their feedback, including issues with file format specifications. The Department has made a concerted effort to review the files contained in the data bundle - based on vendor feedback - and make any necessary corrections.

From

Question/Comment: Xsoft, L.L. Low Associates, Thomson Reuters

In the Tax and Bill to CAMA Integration Test Area, for Test 1**,** it is our impression that the county assessor is the "source" of property location address. As such, changes to the property location address data within a county should occur in the CAMA database and be passed to the Auditor in the PARCEL file for real property, PERSPROP file for personal property, and MOBILE file for annually assessed mobile homes. Typically the Mailing Address is controlled by the Auditor and sent to the Assessor via Tax-to-CAMA.

Answer:

The Department has revised the wording of Test 1 to ask for a change in the mailing address rather than a property location address. This revision is reflected in the finalized version of the Phase II testing scenarios, which is posted to the Phase II Vendor Certification webpage.

Question/Comments and Answers

From

Question/Comment: Xsoft

In the Tax and Bill to CAMA Integration Test Area, for Test 2, when splits and transfers of ownership are provided through the TAX to CAMA file, they are processed as two distinct transactions. First the split must be processed to create the new child parcels and then the transfer of ownership is processed to create the new owners of record. In each case the user does have the ability to make changes prior to processing, however the split must occur first since you cannot change the ownership of a record until that record exists.

Answer:

The Department is amenable to a vendor demonstrating this functionality over the course of a couple of iterations if their system requires more than one iteration for a split in a parcel to occur and the name and address information of the new parcel be updated.

From

Question/Comment: Xsoft, L.L. Low Associates, Thomson Reuters

In the Tax and Bill to CAMA Integration Test Area, for Test 4, you are requiring changes in the values that originated in the tax and billing system to integrate into the CAMA system. The issue here is that the Auditor is not responsible for the valuation of property. The Assessor is always responsible for the valuation of property and is the "source" of valuation information. In turn, there should never be a scenario where the Auditor integrates value changes with the Assessor (i.e., TAX to CAMA), rather it should always be the case that the Assessor integrates value changes with the Auditor (i.e., CAMA to TAX).

Answer:

The Department understands that currently a change to the valuation of a property may technically start in the assessor's office when an assessing official initiates the paperwork for a change to the assessed valuation for a property; however, the actual data entry often does not occur in the CAMA system in the current tax year.

From

Question/Comment: Xsoft, L.L. Low Associates

In the Tax and Bill to CAMA Integration Test Area, for Test 5, the standard practice for allocation of the 1% in the CAMA system has been that users are instructed to assign any potentially eligible land and building record as 1%. If the homestead deduction is filed and approved in the Auditor's office, when the values are rolled from CAMA to TAX, the TAX system's have been running a check to make sure that any homestead eligible properties have 1% values in the roll file.

Answer:

The assessor will continue to allocate any potential land and improvements eligible for 1% in this manner. Upon importation, the tax and billing software will continue to roll values with a homestead to the appropriate bucket. This process is unchanged by the scenarios and is also described in Test Area 1(e).

Question/Comments and Answers

From

Question/Comment: L.L. Low Associates

The assessor does not have to care about homestead eligibility, and shouldn't since it is an Auditor function. Forcing the Auditor to pass homestead deduction information unnecessarily complicates the process. Furthermore, given that the Reporting Capabilities in the Property Tax Management System Test Area requires a reporting mechanism for the discovery of active homestead parcels without a current allocation distribution to the 1% classification group, this requirement introduces an unnecessary redundancy to the system.

Answer:

The Department disagrees with the vendor comment. With the constitutional property tax caps, the assessor needs to be more aware of homestead status as it determines value allocations. This test represents a continuation of what CAMA vendors are required to demonstrate in Phase I testing per the requirements of 50 IAC 26-13-5.

From

Question/Comment: Xsoft, L.L. Low Associates, GUTS

In the Reporting Capabilities in the Property Tax Management System Test Area, for Test 1, we feel that this test should read slightly differently. Rather than being a file passed from the Auditor to the Assessor (TAX to CAMA), this should be done using a file passed from the Assessor to the Auditor (CAMA to TAX). The reason for this is simple, the CAMA system is already required to create and provide the PARCEL file to the auditor, which contains of all of the information that is required under this test. Requiring a new and separate file from TAX to CAMA unnecessarily complicates that process. Additionally, the current wording of this test is in direct conflict with how vendors were directed to accomplish this task in 50 IAC 23 by the DLGF.

Answer:

The Department has revised the wording of this test to ask that the tax and billing system integrate a file from the CAMA system and generate a report that shows the inconsistencies between the two systems. This revision is reflected in the finalized version of the Phase II testing scenarios, which is posted to the Phase II Vendor Certification webpage.

From

Question/Comment: Thomson Reuters

In the Reporting Capabilities in the Property Tax Management System Test Area, for Test 1, similar to tests 1(b), 2(a), and 3(a) in the Tax and Billing to CAMA Integration Test Area, compliance with this test is wholly dependent upon the type of integration environment employed in a specific jurisdiction, real-time or file-based. In a real-time environment, changes flow between systems seamlessly and the data is essentially shared. Because the data that is subject to this test is shared, there could be no expectation that there are mismatches related to inventory, names, or addresses. For real-time environments, we would recommend that this test be deemed inapplicable.

Answer:

Regardless of whether the property tax management system is entirely integrated or involves a batch file process to integrate changes that are made in one module into the other modules of the system, a report identifying potential inconsistencies is still required per the user-defined reporting capabilities under system and integration demonstration in 50 IAC 26-18-3.

Question/Comments and Answers

From

Question/Comment: Xsoft, L.L. Low Associates

In the Reporting Capabilities in the Property Tax Management System Test Area, for Test 2, the standard practice for allocation of the 1% in the CAMA system has been that users are instructed to assign any potentially eligible land and building record as 1%. If the homestead deduction is filed and approved in the Auditor's office, when the values are rolled from CAMA to TAX, the TAX system's have been running a check to make sure that any homestead eligible properties have 1% values in the roll file. This is done by the tax & billing System as an edit in the Annual AV roll process and must be resolved before the "roll" (again at least on our system). Calculation edits and generating a warning when manually flagging a property as Homestead eligible and will also produce an error, which must be corrected at before calculation if any of these exist. As such, the assessor does not have to care about homestead eligibility, and shouldn't since it is an auditor's function. Forcing the auditor to pass homestead deduction information unnecessarily complicates the process.

Answer:

This test represents a continuation of what CAMA vendors are required to demonstrate in Phase I testing per the requirements of 50 IAC 26-13-5. Namely, the CAMA system must indicate which parcels are homestead eligible and ensure that those properties that are eligible for a homestead deduction contain at least a portion of their assessed value in the one percent bucket. Both CAMA and tax and billing vendors are expected to demonstrate that their systems can generate this user-defined report upon completion of the tests in the Integration section of the Phase II testing scenarios.

From

Question/Comment: Xsoft, L.L. Low Associates, GUTS

In the Reporting Capabilities in the Property Tax Management System Area 1, for Test 4, we feel that this test should read slightly differently. Rather than being a report generated from the CAMA system, this should be done from the TAX system. The reason for this is simple, the CAMA system is already required to create the PARCEL file and provide to the Auditor. This file can be created and provided to the Auditor at any time and the Auditor could run the comparison of values report (rather than the assessor). Currently the Assessor/CAMA have no idea what values the Auditor has in TAX; requiring a new and separate file from TAX to CAMA unnecessarily complicates the process. Additionally, the current wording of this test is in direct conflict with how vendors were directed to accomplish this task in 50 IAC 23 by the DLGF.

Answer:

The Department has revised the wording of this test to ask that the tax and billing system can generate a report that shows the differences in current values between the two systems. This revision is reflected in the finalized version of the Phase II testing scenarios, which is posted to the Phase II Vendor Certification webpage.

From

Question/Comment: Thomson Reuters

In the Reporting Capabilities in the Property Tax Management System Test Area, for Test 4, additional clarification is requested relative to the subject PARCEL file. Is this specifically a reference to the PARCEL file data that was provided for a particular value interface (roll) or the values contained in a PARCEL file be it created today? Furthermore, would the comparison be drawn to that data in T & B that was originally interfaced, or would it be to the current value in the T & B system after necessary adjustments as discussed in the CAMA to Tax and Billing Interface Test Area?

Answer:

The report generated is looking at the most current values in the CAMA system and the most current values in the tax and billing system. Under the revision in the wording, this test assumes that the real property assessment files would reflect the most current values in the CAMA system.

Question/Comments and Answers

From

Question/Comment: Thomson Reuters

In the Creation and Exporting of Files Test Area, for Test 1, Phase 1 testing relative to 50 IAC 23 required that only verified and validated sales disclosure data (SALEDISC, SALECONTAC, SALEPARCEL) was to be exported when required. Should this test be construed as a departure from that constraint; now requiring that all data regardless of quality verification and validity confirmation be exported and subsequently relied upon?

Answer:

The parameters for file extraction from the sale disclosure system have not changed. The data extract still requires that all sales records must be verified and validated.

From

Question/Comment: Xsoft, L.L. Low Associates

In the Creation and Exporting of Files Test Area, for Test 2, we feel that this test should read slightly differently. Rather than being a file passed from the Auditor to the Assessor (TAX to CAMA), this should be done using a file passed from the Assessor to the Auditor (CAMA to TAX). The reason for this is simple, the CAMA system is already required to create and provide the PARCEL file to the auditor, which contains of all of the information that is required under this test. Requiring a new and separate file from TAX to CAMA unnecessarily complicates that process. Additionally, the current wording of this test is in direct conflict with how vendors were directed to accomplish this task in 50 IAC 23 by the DLGF.

Answer:

The Department has revised the wording of this test to ask that the CAMA system can generate an extract with the requested information for upload into the tax and billing system. This revision is reflected in the finalized version of the Phase II testing scenarios, which is posted to the Phase II Vendor Certification webpage.

From

Question/Comment: L.L. Low Associates

In the Creation and Exporting of Files Test Area, for Test 3, there is no mention of Mobile Home or Personal Supplemental files. Even though these are vendor developed files they should be included as they are required to complete certain test scenarios. There is no mention of RailAV or UtilityAV files. There is no mention of Tax-to-CAMA files. Even though this is a vendor developed file it should be included as they are required to complete certain test scenarios.

Answer:

This test is asking the various systems of the property tax management systems to generate and export the files as required under 50 IAC 26-20. The property tax management system is not required to export the RAILAV or UTILITYAV files or any supplemental files that may be used in the interface or integration of data between the assessment system and tax and billing system.