Detailed Assessment Audit Manual

Assessment Audit Unit

Alberta Government

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Assessment Audit
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Purpose Statement

The purpose of this manual is to provide stakeholders with a description of the province's detailed assessment audit program; particularly, the assessment standards and best practices that are expected to be reflected in the assessment programs of Alberta municipalities. The manual is meant to be used by auditors to facilitate a consistent approach to detailed audits or can be used by municipalities as a tool for self-review.

Acknowledgements

This manual is an update to the original manual first published in 2004. The Assessment Services Branch wants to extend acknowledgement to assessors and chief administrative officers who have provided input on the Manual. The Branch also wishes to thank Almy, Gloudemans, Jacobs & Denne, for their technical contributions to the original manual version that continues to be the foundation for the province's detailed assessment audit program.

Audit Program Overview

Provincial Audit Program

The provincial assessment audit program is one of Alberta Municipal Affairs' initiatives to maintain an accurate, predictable, fair and transparent assessment and property tax system in which stakeholders have confidence.

Assessments must be equitable in order for fair distribution of municipal property tax and provincial education tax. The assessment audit program's focus is to promote assessment equity within a municipality and between municipalities throughout Alberta by auditing and reporting on assessment performance and advancing best practices.

Two types of audits, annual and detailed, are authorized by the *Municipal Government Act (MGA) section 322(1)(h.1) and the Matters Relating to Assessment and Taxation Regulation (MRAT)*.

Annual Audit Program

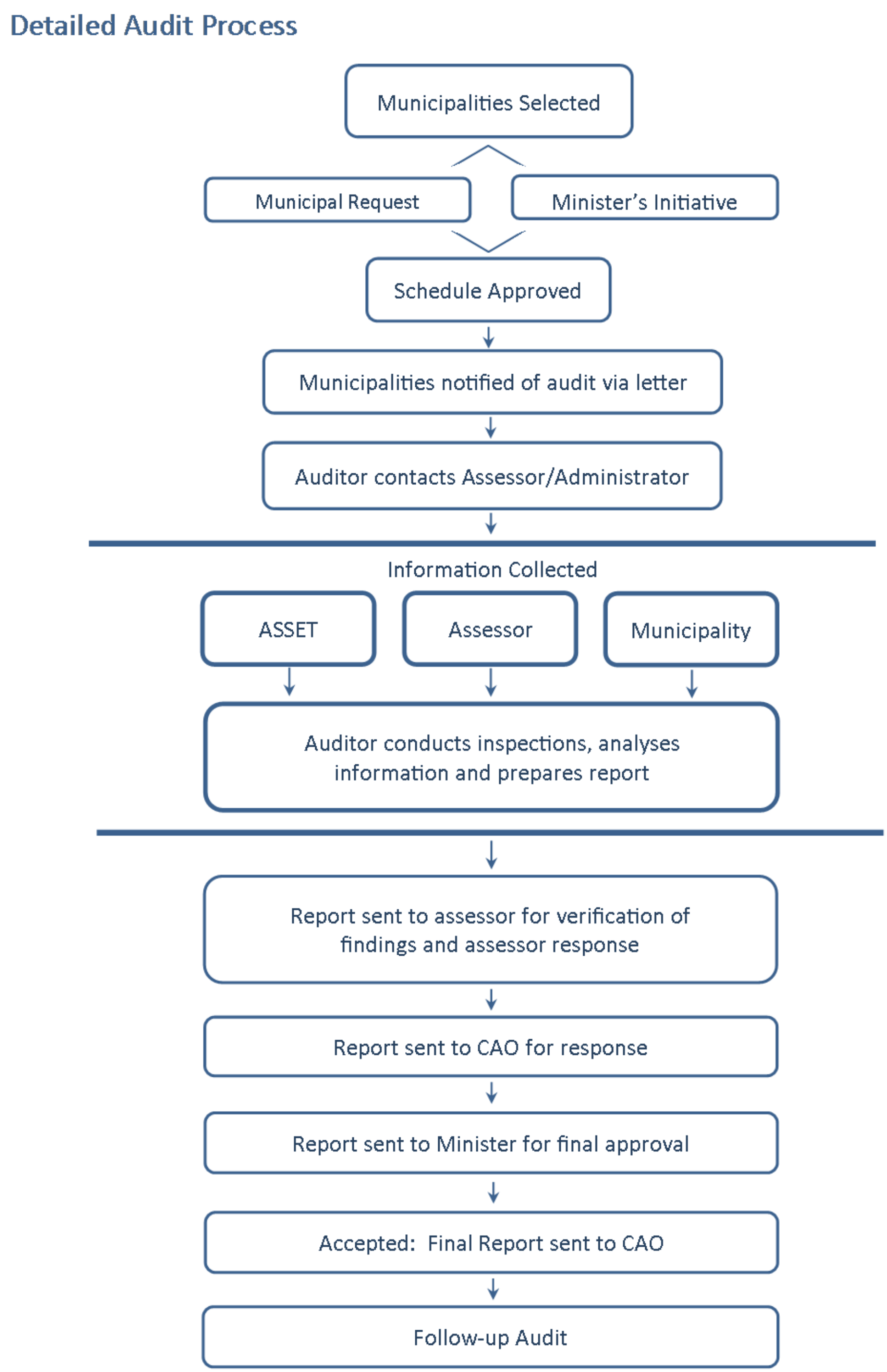
During annual audits, municipal assessors and provincial auditors perform ratio studies for each Alberta municipality. Ratio studies use statistical analysis of assessment and sales data as direct evidence of valuation accuracy and uniformity for properties assessed at market value.

Detailed Audit Program

Complimentary to the annual audit program, detailed audits combine the factual, results-oriented ratio study with the more investigative, process oriented procedural audit to determine if assessments meet valuation and administration standards that can reasonably be expected of Alberta municipalities assessment programs. As well as properties assessed at market value, detailed audits may review property classified as farm land, machinery & equipment, and railway assessed at regulated rates that cannot be monitored by ratio studies.

Assessment Audit is tasked with administering the audit program. Each year a number of detailed audits are scheduled to be undertaken. These audits can be initiated by a municipal request or by Minister's initiative. An audit can be specific to a municipality or can be based on property group which could encompass multiple municipalities.

The following chart illustrates the decision-making process for the detailed audit program.



Detailed Audit Objectives

The objective of a detailed assessment audit is to:

- provide an unbiased opinion as to the quality of a municipality's assessment roll;
- identify and reinforce strengths in a municipality's assessment program;
- identify where opportunities exist to improve assessments or assessment administration.

A detailed audit is considered a success if results provide a means for stakeholders to evaluate assessment quality leading to a strong commitment in implementing opportunities for improvement.

Detailed Audit Methods

The MRAT regulation governs the Minister of Municipal Affairs appointment of auditors and responsibilities of municipal chief administrative officers and assessors to provide information to assessment auditors. The function of the assessment auditor is to prepare a professional review of local assessment performances.

Typically, each of the following components plays a major role in detailed audits:

- **The results of ratio studies and other statistical tests (performance review).** Performance based review (ratio studies) provides direct evidence of valuation accuracy and uniformity of properties assessed at market value. Ratio studies are the primary tool for objective evaluation and measurement of mass appraisal performance. Detailed audits include ratio studies and in-depth statistical analyses by property groups, (e.g., analysis categories) and sub-categories (e.g., market areas) to develop a greater understanding of assessment performance than can be gained from ratio studies performed in the annual audit program.

- **A review of practices and procedures used to establish assessed values (procedural review).** Process-oriented procedural reviews examine assessment methodology and procedures. Process-oriented procedural reviews focus on how assessments are prepared and whether legislative requirements are met, valuation regulations are adhered to, appropriate manuals are used, and if professional standards and guidelines are followed.

- **A review of the municipality's assessment program administration (procedural review).** Administrative review of the municipality's management of the assessment program with a focus on whether legislative requirements are met for administering bylaws, assessment rolls, notices, complaints and public relations.

Assessment auditors make findings and conclusions in relation to applicable legislation and best practice references, as noted in audit standards and tests outlined in this guide. The following is a summary of detailed standards. (See section 2 for a full description of audit standards and tests).

Summary Audit Standards	
PERFORMANCE REVIEW	
Ratio Studies	Market value assessments must meet median assessment ratio and coefficient of dispersion standards.
	The assessor is expected to uniformly and equitably value properties in the municipality.
PROCEDURAL REVIEW – VALUATION	
Property Inventory	The municipality must prepare an assessment annually for every assessable property; except linear property.
	Each property record should contain sufficient information for mass appraisal, and determination of assessment class. Information in each record must be accurate.
	The assessor is expected to maintain a record of property characteristics as at the sale date.
	An assessment must be prepared for partially completed improvements.
Valuation of Property Assessed at Market Value	The assessor is expected to properly apply recommended valuation approach(s) for specific property types.
	In limited circumstances farm land must be based on market value.
	If the municipality has income properties, it is expected appropriate income and expense data is collected and maintained for development of income tables, norms, and models.
Valuation of Special Purpose Property	The assessor is expected to have a well-defined process for valuing special purpose properties.
Valuation of Regulated Property	The assessor must properly apply the minister's guidelines when preparing assessments of regulated properties.
	Assessments must be prepared for machinery and equipment (M&E) to the extent described in MRAT.
	Assessments for railway must be based on information provided by railway operators.
PROCEDURAL REVIEW - ADMINISTRATION	
Appointment of Assessor	The municipality must appoint a person to position of “assessor”.
Supplementary Assessments	The municipality must pass a bylaw to enable supplementary assessments.
	Supplementary assessments are limited to specific improvements, and to the part of a year improvements are complete.
Exemptions	The municipality must apply exemptions from property tax in accordance with legislation.
Assessment Rolls	The municipality must prepare annually an assessment roll by the prescribed date of February 28.
	The assessment roll must contain all information prescribed in legislation.
	If the assessment roll is corrected, the correction date must be shown on the roll and on an amended assessment notice sent to the assessed person.
	A supplementary assessment roll must be prepared before the end of the year.
	A supplementary assessment roll must contain all prescribed information.
	When applicable, the municipality must pass a bylaw designating a manufactured home community as an assessed person.
Assessment Notices	The municipality must annually prepare assessment notices.
	Assessment notices must contain all prescribed information.
	The municipality must send assessment notices by July 1 of the tax year.
	A municipality must notify the public that assessment notices have been sent.
	A municipality must prepare, and send supplementary assessment notices before the end of the year.
	Supplementary assessment notices must contain all required information.
Assessment Complaints	The assessor must ensure assessment records properly reflect decisions of an assessment review board.
Public Relations	The municipality must provide assessed persons with sufficient assessment related information about that person's property.
Provincial Reporting Requirements	The assessor must provide information to the department in the form and manner prescribed by legislation.

Detailed Audit Scope

Detailed assessment audits may review all property types in a municipality except for linear property (the Assessment Services Branch prepares assessments for linear property).

To ensure detailed audits are conducted effectively; the frequency and scope of a detailed audit can vary. For example:

- The detailed audit for larger municipalities may be carried out over several years; making effective use of the municipality's and Assessment Services Branch's time and resources.
- Municipalities with large property counts of each type may be audited more frequently than municipalities with comparatively smaller counts.
- Municipalities or property types with few sales may only have a process-oriented, procedural review because further statistical analysis will not yield results differing from the annual audit.
- A detailed audit may be scheduled for two or more municipalities based solely on "targeted" properties, such as high-value properties, special purpose properties or properties adjacent to the boundaries of neighbouring municipalities.
- Municipalities with the same assessment contractor may be audited in the same year.

Depending on the purpose and scope, the auditor may establish specific objectives for a particular audit.

Detailed Audit Scheduling

A detailed assessment audit may be conducted;

- from results of an annual audit,
- on the Minister's initiative,
- at the request of a municipality, or
- as part of the department's annual schedule.

Each year the department schedules detailed audits for municipalities and/or properties in one or more municipality. The following criteria are considered in scheduling municipalities for a detailed audit:

- findings of the annual audit program;
- building stakeholder confidence in the assessment system, regardless of the size of a municipality or the type of properties;
- determining whether higher-value properties (e.g. high rise, shopping centers, etc.), or unique hard-to-value properties (e.g. golf courses, industrial plants) are assessed correctly and similarly throughout the province;
- the magnitude of assessable property within a municipality, because of its proportional effect on taxes;
- significant changes to legislation, government policies or the assessment process;
- time since the last detailed audit was conducted, and the level of implementation of any recommendations in the previous audit; and
- resources of the Assessment Services Branch to complete scheduled work.

Detailed Audit Process

Municipalities can expect the following steps during a detailed audit:

1. notification of a detailed audit to the Chief Administrative Officer;
2. preliminary meeting(s) between auditor and municipal officials to explain the purpose of the audit;
3. ratio studies and detailed review of municipal assessment procedures including interviews with municipal officials and the assessor(s);
4. auditor's review of draft report with assessor and receives their response;
5. auditor's review of draft report with municipal officials and receives their response ;
6. Ministerial approval of report, including the assessor and municipality responses;
7. final report delivered to municipality ;
8. follow-up evaluation concerning audit recommendations.

Detailed Audit Communications

Communication between the assessor and auditor is informal and continues throughout the audit process. The auditor provides the assessor with information about tests and findings of the audit and the assessor is shown a draft report before release to the municipality. The assessor has an opportunity to review findings with the auditor.

Communication with municipal officials occurs intermittently throughout the audit. The auditor normally meets with the Chief Administrative Officer at the beginning of an audit to explain its purpose; and at the conclusion of the audit, if deemed necessary, or requested. Other municipal officials may be interviewed for information during an audit.

The Chief Administrative Officer and/or assessor are asked to respond to findings by describing directly in the report the actions they will take in addressing recommendations. The appropriate course of action depends on the nature of the recommendations and the costs vs benefits of completing tasks to standard.

It is policy for the Assessment Services Branch to provide a copy of the detailed audit report to the Chief Administrative Officer once the municipal response is received and the report is finalized. The Chief Administrative Officer is advised to inform council of the report and its contents.

Assessment Services Branch staff can present audit reports to council if the municipality makes the request, or if there are recommendations of a significant nature. It is also policy for the Assessment Services Branch to direct anyone requesting a copy of the audit report to the municipality.

Detailed Audit Follow Up

The purpose of a detailed audit follow-up is to evaluate progress on actions the municipality has made in addressing recommendations. The department normally performs a follow-up in the year following delivery of the original report.

Where the assessor/municipality has not satisfactorily addressed high priority recommendations, Assessment Audit at its discretion, initiates contact with the municipality seeking commitment for an action plan to fulfill requirements of the recommendations. Continued non-compliance is then addressed from the Executive Director's office, Assessment Services Branch.

Full Description of Detailed Audit Standards & Tests

Standards

Audit standards reflect Alberta legislation, professional practices, and guideline references from industry organizations.

The *MGA* legislates definitions of value, the valuation date; property rights valued, procedures and methods, and assessment roll administration. Part 9 of the *MGA*, and *MRAT* (AR 220/2004) prescribe procedures and standards for assessments in Alberta. These provisions form the basis for evaluating whether a municipality's assessments are in compliance with legislation.

Additionally, the Assessment Services Branch publishes materials not having the force of regulations. These include Assessment Bulletins and costing manuals used in determination of building values within the cost approach. Although these manuals were regulated for use prior to 1995, they still establish standards of practice for improvement classification; and they remain popular with many assessors. The commercially available *Marshall & Swift* cost manual is commonly used for non-residential properties.

The assessment profession generally accepts the International Association of Assessing Officers (*IAAO*) as the best authority on property assessment administration. The *IAAO's* textbooks (*Property Appraisal and Assessment Administration, and Mass Appraisal of Real Property*), and its series of Assessment Standards are industry bibles. The literature presents theory as well as practical advice on all aspects of assessment administration; providing examples of best practice. The Assessment Standards represent consensus of the assessment profession on technical and administrative issues.

The *Alberta Assessor's Association* and Alberta Municipal Affairs jointly developed the *Property Assessment in Alberta Handbook.* The *Handbook* presents current mass appraisal knowledge on best practices, and sets out preferred approaches to value, valuation models and benchmarks ("valuation parameters") for select property types.

Tests

A variety of tests may be used in a detailed audit. Some merely require determination as to whether a document or condition exists; while other tests require judgment. Still other tests involve measurements based on samples. Assessment literature discusses the importance of sampling properties representing the population. Sold properties can be used as the basis for a sample; however, unsold properties should also be included to assist in the selective reassessment review. The auditor will determine and document their sample.

Performance Review – Ratio Studies

Market value assessments must meet ratio & coefficient of dispersion standards:

Standard

Section 2 of *MRAT* stipulates all market value assessments must:

- Be prepared using mass appraisal;
- Be an estimate of the value of the *fee simple* estate; and
- Reflect typical market conditions for similar properties.

Section 10(3) of MRAT (AR220/2004) requires market value assessments to meet median assessment ratios and uniformity (COD) standards for any stratum of property.

Review

Using information reported by the assessor, the auditor evaluates assessment performance by:

- Ensuring time and other sale price adjustments are valid and supported by market data.
- Conducting ratio studies and other statistical tests.

Depending on the breadth of sales information, the auditor may stratify relatively homogeneous groups of property based on one or more criterion; such as property type, predominant use, market area, improvement class, age, and building size. For vacant property, stratification is according to potential use, size, and market area.

Stratification within a property type (e.g. improved residential or improved non-residential) depends on availability of sales. If sales counts are inadequate, older sales can be added and time-adjusted as appropriate. Generally, substrata with less than five sales are unacceptable, with fifteen being preferable. Strata with smaller sizes are useful for determining patterns but are of little use when counts fall below five.

Using Land Titles data, the auditor notes whether an unusual number of sales are not reported or deemed invalid by the assessor. The auditor may conduct a separate ratio study (with valid sales added back in) to corroborate the assessment level based on assessor information. The auditor should comment when the overall ratio varies significantly from the annual audit.

The auditor may conduct other tests to measure performance, including price-related differential (PRD), unit value, and year-over-year comparisons.

When market data does not exist, the auditor may evaluate assessment performance through a procedural review.

Performance Review – Valuation of Similar Property

Uniform and equitable assessments:

Standard

Procedures are not prescribed in *MRAT* for preparing market value assessments; therefore, the assessor takes into consideration assessments of similar property.

For market value assessments, the assessor is expected to uniformly apply valuation models arrived at through analysis of sales, income, and cost data for similar property. Although factors such as location and municipality size affect markets, assessors must value similar properties in the same manner (not necessarily to the same amount).

Some properties, (e.g. special-purpose), are not easily valued using mass appraisal models. Statistical testing may be very limited in a geographic area, and relate to groups of property with few sales.

Review

Using information reported by the assessor, the auditor conducts a sold vs unsold analysis, testing for fair and consistent application of valuation models. The auditor may review factors/variables, validity of a model; and test for consistent application.

Procedural Review – Property Inventory

The municipality must prepare an assessment annually for every assessable property; except linear property:

Standard

Section 285 of the MGA requires an assessment for each property in the municipality, excepting property listed in section 298(1), and linear property. To fulfill this requirement, the assessor must:

- Identify and locate every property, and
- Annually determine whether each property is assessable.

Land titles, registered plans, and public land dispositions (such as grazing leases), are available through the Province. These documents provide ownership and property information that the assessor needs in creating a record, and determining if a property is exempt from assessment or tax.

Review

The auditor will:

- Review property in a sample of new registered plans or public land dispositions against the assessor's records,
- Note whether the assessor's records contain assessable and non-assessable properties.

The auditor may:

- Ask the assessor to identify properties within the municipality (if any) that are:
  - used for purposes other than the operation of a railway, irrigation works, or drainage works (sec. 290(2)), and
  - subject to a grazing lease or permit from the Crown in right of Alberta or Canada (sec. 290(3)),
- Note whether the year-over-year assessment has changed for a sample of properties.

Property records should contain sufficient and accurate information for mass appraisal and determination of assessment class:

Standard

The *MGA*, Regulations, Guidelines and assessment texts outline required data elements and the importance of accurate information. Accurate information is essential in selecting the appropriate valuation standard and class for tax rates. The *IAAO* recommends that property characteristics data should be continually updated in response to changes brought about by new construction, remodeling, demolition or destruction and that every property be re-inspected once every 4 to 6 years. Re-inspections can be supplemented by self-reporting, aerial or digital imaging, and multiple listing or other third party services. The recommended re-inspection cycle may need to be adjusted when there are significant changes to the legislation or for properties experiencing more frequent changes, for example some oilfield properties.

Review

The auditor will discuss the development permit/building permit process with the assessor to determine if all the information is received from the municipality, and whether the assessor reviews properties with recent permits to ensure that applicable changes resulting from the permits are recorded on the property record. The auditor will review the re-inspection plan and the inspection information and comment on whether the re-inspection plan is being followed. The auditor will review the *ASSET* submissions, listings or sales from the Multiple Listing Service, or if necessary. conduct exterior inspections on sample properties to evaluate whether sufficient and accurate information is recorded. If available, the sample should include approximately:

- 50% sold;
- 50% unsold or sold after the assessment prepared;
- 5% in the above with building permits.

Sample selections should be random (or nearly so), and the size should be sufficient to reasonably represent the population.

The assessor is expected to maintain a record of a property's characteristics at sale date.

Standard

According to *IAAO* texts and the *Property Assessment in Alberta Handbook*, assessors should preserve a "snapshot" of a property's data at sale date so sale prices and property characteristics match during modeling. As well, property characteristics at sale date may be different than as of December 31 of the assessment year. Property characteristics at time of sale can be confirmed through:

- contact with a party to the sale (vendor, purchaser, realtor);
- comparison with a multiple listing service; and/or
- a field check of the property.

The assessor should confirm property characteristics at sale date for all transactions, but especially for transactions producing an ASR of less than 0.70 or greater than 1.30.

Review

The auditor may request the assessor to briefly describe processes for confirming and recording data at the sale date.

For sample properties sold before valuation date, the auditor may review the assessor's sales file and request that the assessor provide a copy of property records showing characteristics as at sale date. The auditor may also compare characteristics on record with multiple listing service data (if available), or with characteristics observed by field inspection.

An assessment must be prepared for partially completed improvements:

Standard

The *MGA* (s. 291(1)) clarifies that an improvement is assessable even if it is not complete or capable of being used; except for improvements used in connection with a manufacturing or processing operation.

Review

If any properties with partially completed improvements exist in the municipality, the auditor may request that the assessor identify a sample, and note whether records and assessments reflect the extent to which improvements are complete.

As well, if new machinery and equipment was assessed, the auditor may note whether construction of the machinery and equipment was complete or in operation before December 31.

Procedural Review – Market Value Assessments

The assessor is expected to properly apply appropriate valuation approach(s):

Standard

The *Property Assessment in Alberta Handbook*, the *IAAO Standard on Mass Appraisal*, and the *IAAO Standard on the Three Approaches to Value* specify which valuation approaches are most commonly used for various property types. The availability of market information (e.g., sales and rent data) and the property type usually co-determine the best approach.

Review

The auditor will compare valuation approaches used by the assessor for different property types with recommendations in the *Property Assessment in Alberta Handbook*. If the recommended approach is not used, the auditor may note whether there appears to be sufficient data to feasibly apply the recommended approach.

The auditor may also request that the assessor supply valuation models, variables, and parameters used to derive values for different property types. The auditor may note whether the valuation models are reasonably supported by market data.

For income property, it is expected appropriate income and expense data is collected and maintained; leading to development of a valuation model(s):

Standard

Various texts describe the importance of collecting income and expense data to support the income approach. The assessor's operational plan should include a description for collecting income and expense data.

Requests for Information (RFI) should be sent to the owners for all income producing properties on at least a three-year cycle. The assessor can gather information through a mail survey, followed up by phone calls, or in-person interviews leading to higher response rates. In municipalities with few rental properties, the assessor should still try to collect income data.

The RFI program should track the number of surveys sent, the number received, and a summary of results. Collected revenue, expense, and sale data should be maintained on a spreadsheet or in the CAMA system to enable analysis in developing tables and schedules of typical parameters (market rents, vacancy, expense ratios, capitalization rates, gross rent multipliers).

If income information is insufficient, the assessor may look to other municipalities for supporting information. Further, various trade and professional groups publish summary income statistics. These publications provide guidance in developing local parameters.

Review

The auditor will request a copy of the income RFI forms, a count of surveys sent/received, and a summary of analysis. The auditor will review income approach parameters (rent rates, vacancy, expenses, capitalization rates) developed by the assessor, along with supporting documentation for consistency and reasonableness.

Procedural Review – Valuation of Special Purpose Property

The assessor is expected to have a well-defined process for valuing special purpose property:

Standard

Special purpose properties are typically large, unique industrial properties constructed to transform raw materials into product. Special purpose properties include properties such as: refineries, smelting plants, power plants, lumber mills and grain processing plants. Location is a key factor for industrial plants – they are generally located near their feedstock and transportation infrastructure.

In Alberta, special purpose properties are often subject to two statutory valuation standards. The buildings and structures (B&S) portion must be valued based on the market value standard. The machinery and equipment (M&E) must be valued following regulated procedures set out in the *Alberta Machinery and Equipment Minister's Guidelines or the 2005 Construction Cost Reporting Guide (CCRG).*

The assessor's process should address the scope of the task, including documenting construction costs, separating B&S from M&E costs, depreciation considerations and statutory requirements for valuing the subject property.

Review

If special purpose properties are located in the municipality, the auditor will request the assessor to describe the valuation process and compare to practices outlined in the *Special Purpose Property Template (Attachment 1)*.

Procedural Review – Valuation of Regulated Property

The assessor must properly apply the Minister's Guidelines for preparing assessments of regulated properties:

Standard

The *MGA* [s. 293(1)(b), s.4 to 7, s.9] and MRAT (s.9), requires the assessor to follow procedures in the *Alberta Assessment Minister's Guidelines* when preparing assessments of farm land, railway, and M&E.

Review

Using information reported by the assessor to the Ministry, the auditor will select a sample of M&E and railway properties. As well, the auditor may select a sample of farm land properties for review if farm property characteristics are expected to change due to irrigation rights or new breaking. The auditor will request a copy of the property records, and test whether the *Guidelines* have been properly applied and assessments calculated correctly.

For M&E properties for which the *Minister's Guidelines* do not provide rates, the auditor may select a sample of properties and request documentation showing assessable costs, non-assessable costs, and other relevant information to test that procedures in the CCRG have been followed.

Assessments must be prepared for machinery and equipment to the extent described in regulations:

Standard

For the purposes of section 298(1)(z) of the *MGA* and section 9(3) of *MRAT*, an assessment prepared for M&E must reflect 77% of value.

Review

In municipalities with M&E, the auditor will select a sample of properties, testing whether assessment levels are at 77%.

Railway assessments must be based on information provided by the railway operator:

Standard

The MGA [s. 293(3)] directs the assessor to prepare railway assessments based on operator reporting provided by December 31. It is expected that the assessor will annually request the report from the operator. If the report is not provided, the assessor must prepare the assessment using the best information available.

Review

The auditor will request a copy of the assessor's RFI, and a copy of the operator’s report, testing if the assessment is based on the information provided.

Administrative Review – Appointment of Assessor

The municipality must appoint a person to position of assessor:

Standard

Once council has established the position of assessor as a designated officer, an individual with appropriate qualifications must be appointed to the position. Council may appoint by bylaw (or resolution), or delegate the task of appointing a person to the position to the Chief Administrative Officer.

Review

The auditor may request a copy of the document appointing an individual to the position of assessor and note the manner and authority by which the individual was appointed.

Administrative Review – Supplementary Assessments

The municipality must pass a bylaw to enable supplementary assessments:

Standard

If a municipality prepares supplementary assessments, council must pass a bylaw pursuant to section 313 of the MGA.

Review

If the municipality prepares supplementary assessments, the auditor may request a copy of the applicable bylaw; testing if the contents are in compliance with legislation.

Supplementary assessments are limited to specific improvements and to the part of the year in which the improvements are completed or occupied:

Standard

Section 314 of the MGA describes circumstances when improvements are subject to supplementary assessment. It must be prorated to the number of months during which an improvement is complete, occupied, located in the municipality or in operation, including the whole of the first month in which the improvement was completed, was occupied, was moved in the into the municipality or began to operate.

Review

For a sample of properties with supplementary assessments, the auditor may request a copy of property records testing for completion (or occupancy) date, and proration calculations.

Administrative Review – Administration of Exemptions

The municipality must apply exemptions from property tax in accordance with legislation:

Standard

Section 351 of the MGA describes property exempt from all taxation, unless a council bylaw cancels the exemption.

Sections 361 to 365 of the MGA (and where applicable the regulations), describe properties exempt; in whole, in part, or with conditions from property tax.

Review

The auditor will select a sample of properties described in sections 361 to 365, and if applicable, a sample of properties described in *MRAT* and the Community Organization Property Exemption Regulation (COPTER); testing whether the application of exemptions accords with legislation. The auditor may request an explanation of procedures used when considering exemptions.

If a municipality makes exempt properties taxable; or, exempts taxable property pursuant to sections 363 or 364 of the *MGA*, the auditor may request a copy of the bylaw to test if contents are in compliance with legislation.

Administrative Review – Assessment Rolls

The municipality must prepare annually an assessment roll by the prescribed date:

Standard

Section 302(1) of the MGA directs a municipality to prepare by February 28, an assessment roll for property other than linear property. However, pursuant to section 308(3) of the *MGA* the municipality must record on the roll, information contained in the linear property assessment notices.

Review

The auditor can note the date the assessment roll was prepared, and whether the roll is in electronic and/or hard copy form. If linear property exists the auditor may also review whether the roll includes information shown on linear assessment notices.

The assessment roll must contain all information prescribed in legislation:

Standard

Section 303 of the *MGA* describes the minimum information that a municipality must record on the assessment roll.

Review

The auditor may test if the assessment roll contains all information prescribed in the *MGA*. The auditor will note what information the municipality choses to include beyond what is required.

If the assessment roll is corrected, the date the correction is made must appear on the roll and an amended assessment notice must be sent:

Standard

Section 305 of the MGA provides the means to amend the roll for the current tax year only. If the roll is amended, the date of amendment must be shown and an amended assessment notice must be sent to the assessed person(s).

Review

Using information reported to the Ministry, the auditor may note the number of changes made to the roll pursuant to section 305 of the MGA. For a sample of changes, the auditor can review copies of the amended notice(s), and request explanations for the changes; testing if the amendment date is shown.

Supplementary assessment roll:

Standard

Section 315(1) of the *MGA* requires the municipality to prepare a supplementary assessment roll by December 31 of the year in which supplementary assessments are prepared.

Review

The auditor may note the date supplementary assessments were prepared.

Prescribed supplementary assessment roll information:

Standard

Section 315(2) of the *MGA* describes the minimum information that a municipality must record on the supplementary assessment roll.

Review

The auditor may test contents of the supplementary assessment roll against contents prescribed in the *MGA*. The auditor may also note what information the municipality choses to include beyond required contents.

When applicable, the municipality must pass a bylaw designating a manufactured home community as an assessed person:

Standard

Section 304(1)(j) of the *MGA* permits a manufactured home community to be the assessed person of a manufactured home rather than its owner; however, the municipality must pass a bylaw to that effect.

Review

If a manufactured home community is recorded on the assessment roll as the assessed person, the auditor may request that the municipality provide a copy of the applicable bylaw; ensuring that the community has been properly designated as an assessed person.

Administrative Review – Assessment Notices

Annual preparation of assessment notices:

Standard

Section 308(1) of the *MGA* directs the municipality to annually prepare assessment notices for all assessed property in the municipality and to send notices to the assessed person.

Review

The auditor may request a copy of assessment notices for a sample of different property types to test that an assessment notice is prepared for all assessed properties.

Contents of assessment notices:

Standard

Section 309(1) of the MGA describes the minimum information municipalities must include in an assessment notice.

Review

Using a sample of assessment notices for different property types, the auditor will examine notices for compliance with the legislation.

The municipality must send assessment notices by July 1 of the tax year:

Standard

Section 310(1) of the *MGA* requires assessment notices be sent by July 1 of the year in which taxes are imposed.

Review

Using a sample of assessment notices for different property types the auditor may note whether notices were sent prior to July 1.

Public notification:

Standard

Section 311(1) of the *MGA* requires a municipality to publish in a newspaper or any other manner considered appropriate, a notice that the assessment notices have been sent.

Review

The auditor may request that the municipality provide a copy of the newspaper (or of any other means used) where the public is notified that the assessment notices were sent.

Sending supplementary assessment notices:

Standard

Section 316(1) of the MGA requires that the supplementary assessment notices be sent no later than December 31.

Review

The auditor may note the date the assessment notices have been sent in conjunction with the test performed with section 316(2) of the Act.

Contents of supplementary assessment notices:

Standard

Section 316(2) of the MGA describes the minimum information municipalities must include in a supplementary assessment notice.

Review

The auditor may request a copy of supplementary assessment notices for a sample of improvements; testing that the contents are in compliance with legislation.

Administrative Review – Assessment Complaints

Compliance with Assessment Review Board decisions:

Standard

IAAO texts discuss the importance of maintaining accurate records on the status and disposition of complaints. The assessor must ensure decisions of a hearing are correctly reflected in affected assessments, and in the assessment records. The assessor should also note whether the decision is binding on future assessments and, if not, make a note to review the assessment for next year.

Review

The auditor may request a copy of assessment records for a sample of properties where a complaint was heard, noting whether the records and assessments reflect the decisions.

Administrative Review – Public Relations

Provision of assessment information:

Standard

Sections 299 and 300 of the *MGA* require the municipality to let an assessed person see or receive sufficient information to show how an assessment was prepared.

Review

The auditor will ask what the municipality's process is for requesting and responding to an assessed person.

Administrative Review – Provincial Reporting Requirements

Information provided by the assessor:

Standard

Sections 293(3) and s.319 of the *MGA* requires the assessor to provide information to the Ministry in a prescribed form and manner.

MRAT directs the assessor to maintain a record of information for every property, and to provide property and sales information in accordance with procedures set out in the *Alberta Assessment Quality Minister's Guidelines*. The return of information is used to calculate equalized assessments for the municipality.

The Guidelines identify information deadlines. Part 2 of the *Guidelines and the Recording and Reporting Information for Assessment Audit and Equalized Assessment Manual (R&R)*, details what information is required and the standardized electronic format.

Review

Using information reported to the Ministry, the auditor will review the **'Data Check Report'** and any review or recommendations addressed during annual audits. The program analyzes and rates a municipality's reported data by contrasting what should be reported to what was reported in the annual (ANN) and indicator of value (IOV) submissions; and provides an overall score. For properties not having information in the required form, the auditor notes the affected properties and deficient information.

Note that the report only gives an indication of compliance to data reporting requirements. For instance, a municipality may have a high overall score; giving the municipality a feeling of acceptable reporting. However, the entire report should be reviewed to determine if there are important data attributes with low scores. High scores are achievable; however, a perfect score is not achievable since some properties do not have the information (e.g. building size for a property where the only improvement is a fence).

As part of internal quality control, assessors should be reviewing these reports to determine areas where reporting can be improved.

The auditor should examine; the date information is reported, if the required data elements are present, and whether complete information was reported in determining assessment levels.

Changes to the assessment roll:

Standard

Section 305.1 of the *MGA* requires a municipality to report to the Minister, within prescribed timelines, any corrections or changes made to the assessment roll under sections 305, 477 or 517 of the *MGA*.

Section 15 of the *MRAT* directs the assessor to report information in accordance with procedures set out in the *Alberta Assessment Quality Minister's Guidelines.*

Review

The auditor may test whether the information was reported following procedures in the *Alberta Assessment Quality Minister's Guidelines.*

Attachment 1 - Special Purpose Property Template

A review of the process used by the assessor in the application of the 2005 construction cost reporting guide and applicable legislation to prepare the assessment for the following property:

Municipality: Facility:

Task Reviewed	Requirements	Auditor Notes: These are provided to assist the auditor in his/her review of each task.
Section A – The assessor is familiar with standards for reporting costs as follows:		
1. Does the assessor have the initial detailed budgets and *final forecasted costs* for the project?	Best practice guidelines	Copy should be in the assessor's file. Are the *final forecast costs* equal to the *actual final project costs*? **Reference:** IG (Interpretive Guide) Page 2, "Standards For Reporting Costs".
2. Has the company provided actual total project cost and included a signed statement verifying costs?	Best practice guidelines	Note: sometimes the *total project cost* reported is not the total project cost, but what the stakeholder believes is the total cost of M&E, B&S, etc. *Posting Level Accounts (PLA)* are fundamental to cost renditions as all expenditures; are posted to these accounts. The PLA is the base for both reporting, recording and, eventually determination of included costs as part of the project cost rendition. Actual copies of *Authorization For Expenditures (AFE))* should be provided by the company. *Capital (project) costs* include all those detailed cost components, direct or indirect, associated with construction of an asset. The *fixed asset listing* (book value) contains much of the costing information required.
3. Has the assessor calculated *the total project construction costs* prior to the application of CCRG, MGA, and MRAT?	Best practice guidelines	Recognizing the impacts of: *Contingency, Accruals, Scrap value, Revenue* and *Taxes*? CCRG- 2.300.600 for GST CCRG- 2.300.700 for duty CCRG- 2.500.500 for property taxes The assessor should be aware many of these items reside with sub-contractors. There is often a clause in the contract where the contractor must provide information for taxation purposes before release of holdbacks.
4. Has the company provided its own analysis of total *project costs*?	Best practice guidelines	In accordance with section 1.000 and 1.100 of the CCRG, has the company used so called '*industry standards*' or *"received from other assessors on similar projects*" in completing its analysis? Reference: CCRG Section 1.000 and 1.100.
5. Are there any lump-sum contracts included in the total construction costs?	Best practice guidelines	The assessor should be aware of these and the appendices that often accompany the contract; details to assist in allocation. Have excluded costs been identified?
6. Has a copy of the contract (procurement) for the lump - sum-costs (indicating the detailed cost components) been provided?	Best practice guidelines	These lump-sum contracts usually occur with civil work. The assessor should review to discover if some individual cost items included in the contract are non-assessable costs…or to properly allocate between B&S and M&E.
7. Was the facility built using "in-house" construction or an EPC (*Engineering, Procurement, & Construction*) firm?	Information only.	If the owner leaves construction activities to the EPC firm only, supervision costs of the EPC firm by the owner may be, to some degree, an excluded cost. EPC costs are sometimes labelled as *Home Office Allocation Costs*.
8. Have *commissioning* costs been reported as part of total project costs?	Best practice guidelines	If so, what are the details? *Commissioning* is the analysis and verification of operational processing or manufacturing systems. This may include spare parts, operations training and consumption of feedstock and chemicals. This cost is excluded according to the CCRG.

Task Reviewed	Requirements	Auditor Notes: These are provided to assist the auditor in his/her review of each task.
9. Have costs for Construction Management been identified?	Best practice guidelines	Have these costs been associated with the appropriate property type after the CCRG items have been identified? The owners construction management costs may not have been reported in the EPC costs (Engineering, Procurement and Construction costs) reported by the owner.
10. Has a complete project chart of accounts been received?	Best practice guidelines	Have the summary level accounts been explained and understood by the assessor? What is included in each account? Is there a project cost differentiation between B&S, M&E and additionally labor and materials?
11. Have detailed cost reports been received?	Best practice guidelines	Are the terms of the cost reports understood by the assessor?
12. Has a model been used to assign costs to various property types?	Best practice guidelines	Estimates may be used when no immediate cost details are available. It should be recognized estimates are used as an interim method until such time as actual costs and methods can be used to categorize the property-type cost. Models in most cases are not valid for calculation of excluded costs.
13. Has the allocation of *overhead costs* been based on actual costs?	Required by legislation (CCRG)	Has the costs allocation been reconciled to posting level accounts so as to prevent duplicate claims? Has the reconciliation process been explained and understood by the assessor? Based on the information received on the above 3 items.
14. Have extraordinary conditions been attributable to the project which increases abnormal costs?	Required by legislation (CCRG)	<u>Abnormal Costs of Construction</u>: In order to reduce uncertainty and improve assessment consistency among regulated properties, the following assumptions are made to describe normal conditions for construction of a regulated property: Assessable costs are consistent with those costs to prepare • An adequate workforce is readily available at the worksite. [Balanced market = supply/demand market @ site…not somewhere else]. • Raw materials and pre-fabricated component parts are readily available. • Projects are financed from operations or shareholder equity and companies make no provision for interest during construction, and • Premium payments are not made for overtime worked. The determination of what constitutes "typical" or "normal" is difficult; it is subjective and it may change over time, from one location to another and among industries. Acceptable excluded costs must be identified in section 2.500. Reference: CCRG 2.500 If construction costs of an individual facility are greater than typical construction costs, the excess costs of the facility are considered abnormal and are excluded. Abnormal costs can result from delays in construction due to inclement weather, lack of supplies or unproductive labour. Two examples of abnormal costs are: • A cost that would typically not be incurred in a balanced market, [balance at site. not elsewhere]. • A cost that is excluded to maintain consistency among regulated

Task Reviewed	Requirements	Auditor Notes: These are provided to assist the auditor in his/her review of each task.
Section B – The assessor is familiar with legislation and has applied it correctly to calculate the property's assessment:		
1. Have non-assessable item (excluded) costs and exempt been removed from *total project construction cost* in accordance with section 298 of the MGA?	Required by MGA s.298	Some of the items in 298 to be excluded (no assessment to be prepared) are as follows: Water and sewage conveyance systems operated in connection with a manufacturing or processing plant. Wheel loaders, trucks and haulers crawler type shovels, hoes and dozers. Reference: MGA s.298
2. The assessor's policy, with respect to determining the portion of the assessment attributable to a water supply and distribution system, water conveyance system or sewage conveyance system operated in connection with a manufacturing or processing plant verifiable based on actual costs.	Required by MGA s.298(1)	No assessment is to be prepared for: 1. Water conveyance system (that treats water up to a municipal standard) operated in connection with a manufacturing or processing plant. However, any improvement costs required to treat the water to a higher than municipal standard required by the process is assessable. 2. A sewage conveyance system operated in connection with a manufacturing or processing plant for domestic sewage. However, the additional costs incurred for the additional treatment of the effluent from the plant are assessable. Reference: MGA s.298(1)
3. Building and structure costs and the cost of machinery and equipment have been properly allocated.	Required by Legislation	Building and structure costs should reflect local material and labour costs. See definition of M&E and B&S in MGA. If buildings are assessed at market value, then actual project costs for buildings must be removed in the final reconciliation of property categories. Market value of the buildings replaces the actual costs of the same.
4. When land assessment is based on the value of finished industrial land (stripped and graded), actual site preparation costs are excluded.	Required by legislation (CCRG)	Excluded site preparation costs do not include work for foundations, piling, underground services etc.
5. Cranes and crane ways used operationally (as part of the process) are assessed as machinery and equipment.	Required by legislation (CCRG)	
6. Tanks used exclusively for storage are assessed as building and structures.	Required by legislation (MGA)	This is partially provided for in the MGA, as Section 322 establishes the minister's guidelines that are referenced in MRAT regulation (AR220/2004). Specifically the Alberta Machinery and Equipment Assessment Ministers guidelines and the 2005 Construction Cost Reporting Guide. Reference: CCRG Page 3 MRAT section (j) - M&E definition establishes what improvements are included as M&E, and assessed in accordance with regulations. If no process is occurring within storage tanks, they are assessed as an improvement at market value. Reference: MRAT
7. The assessor's policy, with respect to application of the *Minister's Guidelines*, is acceptable.	Required by legislation (Ministers Guidelines)	Correct AYM, cost conversion factors, depreciation, and assessment levels reviewed by auditor. References: Alberta Machinery and Equipment Minister's Guidelines – Sections 2.001, 3.00, 4.001, 4.002, and 5.00 and MRAT Section 9.
8. The assessor has acceptable evidence and documentation of the amount of obsolescence granted under Schedule "D".	Required by Part 5 of the Minister's Guidelines	Alberta Machinery and Equipment Assessment Minister's Guidelines, section 5.000

Task Reviewed	**Requirements**	**Auditor Notes: These are provided to assist the auditor in his/her review of each task.**
9. Have non-assessable item (excluded direct and indirect) costs been removed from the total project construction cost in accordance with the CCRG?	Required by legislation (CCRG) and Interpretive guide.	*A) This* ***"is a cost that is excluded to retain consistency among regulated properties"*** *RE: Page 5, Assessable Costs, Interpretive Guide to the 2005-CCRG.* B) ***"an adequate workforce is readily available at the worksite"*** *RE: 2.500, Abnormal Costs of Construction, 2005 CCRG and also Page 10, Abnormal Costs of Construction, Assessable Costs, Interpretive Guide to the 2005-CCRG.*
10. Feasibility Studies	Required by legislation (CCRG)	The costs associated with studies evaluating viability of a proposed project are excluded. Costs of feasibility studies must be reported separately from costs of developing working models facilitating construction or staff training, which are included as project costs. Reference: Section 2.100.100
11. Cancellation Charges	Required by legislation (CCRG)	Payments made to a contractor for cancellation of a contract before any construction is performed are excluded. Reference : Section 2.100.200
12. Commissioning, Pre-Production Run and Start-Up	Required by legislation (CCRG)	The costs associated with the following activities occur after physical completion of construction and are excluded: • Commissioning: the analysis and verification of operational processing or manufacturing systems. • Pre-production run: pre-operational run of the process allowing for adjustments, revisions, etc., that produces product to specification. • Start up: a run producing on-spec product, at design quantities, within warranty provisions. Note: the cost of equipment installed during, or as a result of commissioning, pre-production and start-up are included. Reference: Section 2.200.100
13. Consumable Materials	Required by legislation (CCRG)	The costs for chemicals and catalysts consumed as part of an industrial process and during commissioning, pre-production, and start-up are excluded. Reference: Section 2.200.200
14. Royalties, Licenses and Patent Fees	Required by legislation (CCRG)	The payments made for the right to use particular processes are excluded. Reference: Section 2.300.100
15. Mobile Equipment	Required by legislation (CCRG)	The costs for mobile equipment are excluded. Reference: Section 2.300.200
16. Spare Equipment	Required by legislation (CCRG)	Spare machinery and equipment stored on site, but not designated as standby equipment (can be used if required), are excluded. Reference: Section 2.300.300

Task Reviewed	Requirements	Auditor Notes: These are provided to assist the auditor in his/her review of each task.
17. Design Changes, Alterations and Modifications	Required by legislation (CCRG)	Alteration costs incurred during construction that improve the operations efficiency of the original plant design are excluded. Likewise, costs of "de-bottlenecking" or modifying an operational process are excluded if there are no changes to the equipment inventory. Note: The cost of equipment installed to improve operational efficiency is included. The original budgeted cost is normally allocated to Authorization & Expenditure (AFE). The AFE for a facility is approved by a company's authorized personal. They would approve an AFE Budget and supplemental AFE's at the point of investment decision. However, the assessor should ascertain if there was an **AFE Scope change** after the AFE budget was approved as a major modification in the initial scope of work could result in a facility which is materially different. Have these changes in M&E or B&S items been approved by construction orders, scope changes or addenda? If so, have the documents been analyzed by the assessor? Have cost impacts been reconciled within the allocable portion of project costs i.e., B&S and M&E? Reference: Section 2.300.400
18. Interference costs	Required by legislation (CCRG)	Additional costs incurred for reasons of safety while working in close proximity to existing facilities, such as the cost of pilings to ensure the structural integrity of existing buildings or rerouting of piping, electrical lines, telecommunications lines, are all excluded. How have interference costs (cost incurred while working in close proximity to existing facilities) been determined/calculated? Interference costs are rarely captured directly by the accounting system. As such, a percentage of total costs are often used. The assessor must ensure no duplication of excluded cost claims exist when a claim for interference costs is made. Reference: Section 2.300.500
19. Goods and Services Tax	Required by legislation (CCRG)	GST paid on construction materials and services is excluded. Reference: Section 2.300.600
20. Import Duty and Brokerage Fees.	Required by legislation (CCRG)	Duties and fees levied on an imported component increasing its cost above the cost of a comparable component made in Canada are excluded. Reference ; Section 2.300.700
21. Bonus or Penalty	Required by legislation (CCRG)	Bonuses such as those paid to a contractor for early completion, are excluded. Similarly, a financial penalty imposed for failure to meet a condition in the contract is not deductible. Reference : Section 2.300.800
22. Computer Costs.	Required by legislation (CCRG)	Hardware and software computer costs not used, or intended to be used, as part of or in connection with the property being assessed, but are necessary to support business activities carried on at the facility (such as accounting and personnel), are excluded. Reference : Section 2.300.900
23. Travel Costs	Required by legislation (CCRG)	Costs for paying staff for time spent traveling to and from the worksite or any costs to supply transportation for the workforce to and from the site are excluded. Reference : CCRG 2.500

Task Reviewed	Requirements	Auditor Notes: These are provided to assist the auditor in his/her review of each task.
24. Transportation Costs	Required by legislation (CCRG)	Costs of transporting raw material and components from the Edmonton area to the work site are excluded. However, if actual transportation costs from the point of origin to the plant site are equal to or less than the cost to the Edmonton area, the entire transportation costs are included. (FOB Edmonton.) Note: Costs of loading and un-loading raw materials and components are included. Note: The assessor should ensure percentage travel exclusions are made for labour component only. Reference : Section 2.500.100
25. *Interest During Construction* (IDC)…or, AFUDC (*Allocated Funds Used During Construction).*	Required by legislation (CCRG)	Interests used to finance construction of a regulated property (M&E) are excluded. This "interest" may well be the IRR (internal rate of return) for the corporation (opportunity cost of money), even if not a loan *per se*. Reference : Section 2.500.300
26. Overtime Costs	Required by legislation (CCRG)	The premium portion of wages and benefits paid for overtime is excluded. For example, if time and a half is paid, the regular time portion is included but the extra half portion is excluded. Reference : Section 2.500.400
27. Un-productive labour due to extraordinary conditions.	Required by legislation (CCRG)	This calculation should only be for extraordinary conditions (abnormal costs) during the construction of the plant as identified in the CCRG (i.e., cost of labour waiting on site for large periods of time for material delivery). Note: Actual costs of construction may exceed budgeted costs and the owner may claim the overrun is attributable to unproductive labour. This claim overlooks the entire process of forecasting, revised estimates, trends (changes) and contract extras which impact the revised (budgeted cost) estimate. Reference: IG - PG 9, "Abnormal Costs of Construction"
28. Accommodation costs	Required by legislation (CCRG)	Camp operations for example. Reference : CCRG 2.500
29. Staff Training Costs	Required by legislation (CCRG)	Staff training costs pertaining to construction and part of the project costs are included. Staff training costs relating to commissioning activities and plant operations are part of the project costs, and are excluded.
30. Meal Costs	Required by legislation (CCRG)	Reference : CCRG 2.500
31. Property Taxes	Required by legislation (CCRG)	Property taxes are excluded. Reference : CCRG Section 2.500.400
Section C – The assessor adheres to best practice guidelines for the following miscellaneous procedural tasks:		
1. The assessor's policy, with respect to providing the auditor with all information requested by the Minister, is acceptable.	Required by MGA s.293(3)	Reference : MGA s.293(3)
2. Does the assessor have the current project plot plan?	Best practice guidelines	Is this initial construction? If not, are previous plot plans available? Have the plans been compared to identify potential new additions and deletions?
3. Does the assessor have *process flow diagrams* and narratives, including a *project execution plan*, for the facility?	Best practice guidelines	Have different types of property been identified (buildings, land, M&E, linear, etc.)? Has the start-point and end-point of different properties been identified?

Task Reviewed	Requirements	Auditor Notes: These are provided to assist the auditor in his/her review of each task.
4. The assessor's knowledge of processes involved in specialty plant operation is satisfactory.	Best practice guidelines	Assists in allocating between B&S, M&E and Linear; or any bottlenecks, etc.
5. The assessor has verified the accuracy of submitted property data by completing a review and onsite inspection.	Best practice guidelines	Interview with key personal has been conducted. Have any changes to the plot plan been addressed (additions, deletions, omissions)?
6. There is documentation to validate the assessment and the assessor is using best practices with respect to information storage, retrieval and security.	Best practice guidelines	
7. Annual review of additional depreciation granted under Schedule "D" is conducted.	Best practice guidelines	
8. Assessor sends out an RFI on an annual basis and follows up on missing and or insufficient information.	Best practice guidelines	The RFI should be consistent with requirements for detailed cost analysis. If there is no consistency between the RFI and the response to it, then cost analysis becomes very difficult to be accurate and equitable. Reference : Sample Linear Property RFI
9. If the municipality has a supplementary assessment, the auditor should request a copy.	Information only	

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